APPENDIX 4.5 – THE HIGHLAND COUNCIL PRE-APPLICATION ADVICE FOR MAJOR DEVELOPMENTS – SEPTEMBER 2023

The Highland Council
Comhairle na Gàidhealtachd

PRE-APPLICATION ADVICE FOR MAJOR DEVELOPMENTS

Reference no:	23/03059/PREMAJ	**Date of Issue**:	20 September 2023
Proposal:	Construction of electricity transmission infrastructure comprising wood pole and steel lattice supported overhead lines in order to connect several wind farm generators	**Address:**	Spanning An Area Between Armadale in the West And Connagill Substation In the East
Case officer:	Michael Kordas	**Email and phone no:**	Michael.Kordas@highland.gov.uk
Confidentiality Requested	Yes		

This pre-application advice has been specifically prepared for SSE as the applicant and as the agent for the proposed development at Spanning An Area Between Armadale In The West And Connagill Substation In The East

Description of proposal

Construction of electricity transmission infrastructure comprising wood pole and steel lattice supported overhead lines in order to connect several wind farm generators

Summary of Key Issues

The Council is supportive of renewable energy developments in principle, including the necessary grid connections. This is clearly a complex project that will require to be consented and delivered in stages and parts of the overall development are also contingent on the outcome of windfarms that are currently undergoing consideration under Section 36 of the Electricity Act, with the Council as consultee.

In recognition of this complexity, the Council's key concerns at present relate to the landscape and visual impact of the proposals. At the meeting, SSEN expressed a preference for steel lattice towers over the low profile steel pole and NeSTS monopole. We would request more clarity on the usage of these different transmission tower options as the proposals progress, with a view to minimising the effects on surrounding landscapes and viewpoints and the nature of the wider project may provide the opportunity to consider these different solutions. In this respect, we would also require that undergrounding options are considered for the most sensitive locations. Additionally, it would be useful to have flythrough / visualisations available for the proposed overhead line routes and it would be useful to have further discussions through the Council's design workshop service win advance of any Section 37 submissions.

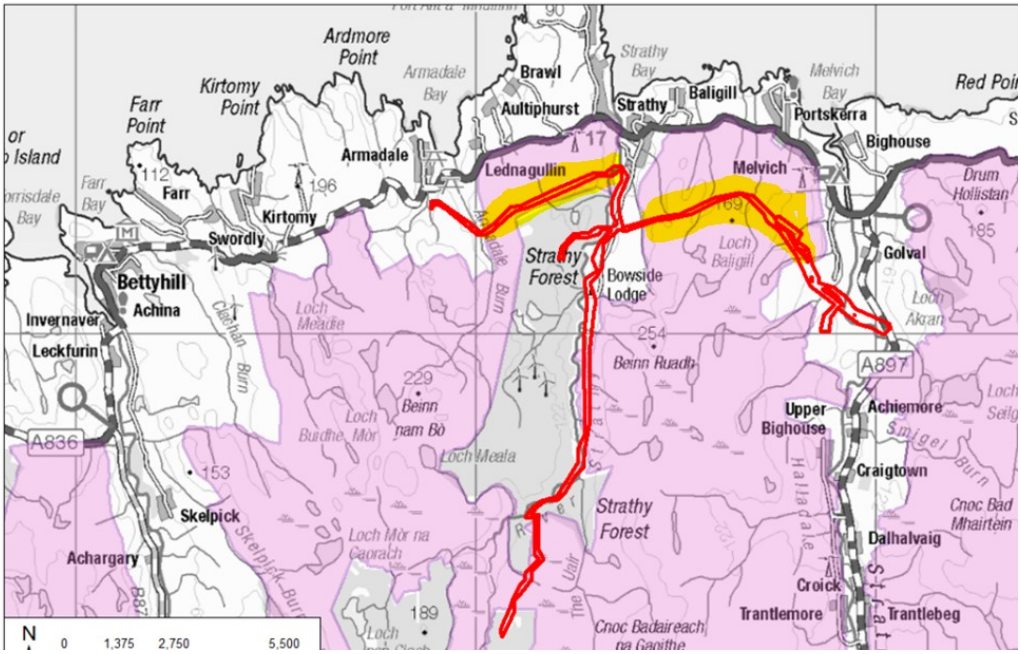
Under NPF4, all major and nationally significant projects are also now required to demonstrate biodiversity enhancement and the Council would recommend comprehensive assessment of the existing ecological baseline. As discussed in more detail below, Historic Environment Scotland also have significant concerns regarding the Armadale Wind Farm connection element and further consultation with HES is recommended as the project moves forward.

Potentially, the most challenging issue is that parts of the proposed transmission routes are proposed to either cross or be constructed close to the candidate Flow Country World Heritage Site (WHS), as shown in the image below. As discussed in more detail by the Ecology Officer, the Council would be unlikely to be in a position to support any proposals that impact on the outstanding universal value of the WHS or its setting. The peatland, its ecosystem processes, bird and plant assemblages make up the Outstanding Universal Value (OUV) of the proposed WHS. If any of these attributes are compromised, then the OUV is impacted. As impacts on an OUV cannot effectively be mitigated, it would be unlikely that the Council would be in a position to support any route across the Candidate WHS at this point.

There may however, be the potential to route the east-west elements of the connection further to the north, alongside the A836 / NC 500 route. Given the tourism significance of this route and proximity to the Farr Bay, Strathy and Portskerra Special Landscape Area, the most acceptable solution would be undergrounding the route at this point.

In any case, it will be important that any proposal coming forward are presented as comprehensively as possible, considering not only the footprint of the required overhead line and switching infrastructure, but also any wayleaves and additional access and maintenance provisions required.

The Flow Country Candidate World Heritage Site (Proposed)



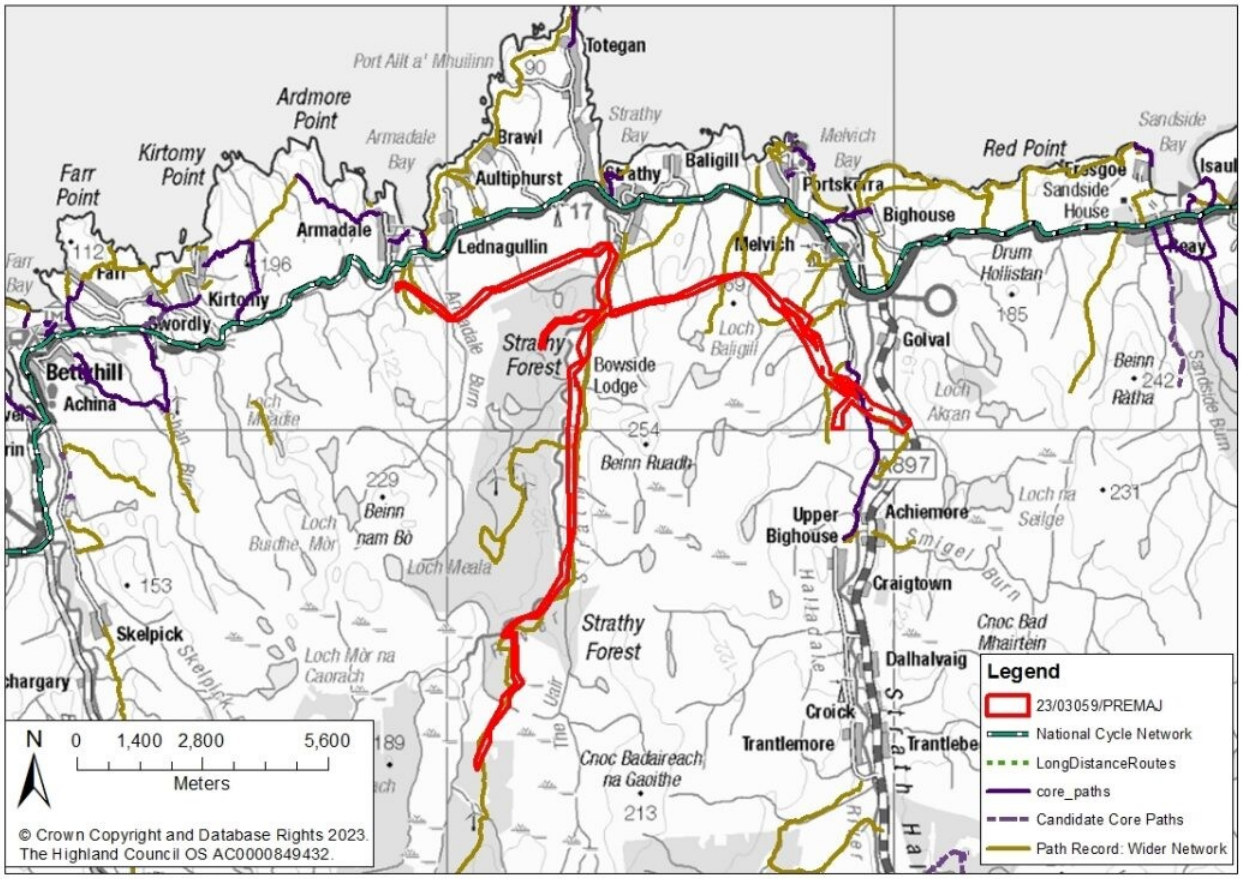
Background Information		
Site Area	**4169764 m2**	
Land Ownership	**Various**	
Existing Land Uses	**Mainly rough grazing / undeveloped land**	
Grid Reference	**283620 (E)**	**962632 (N)**

Consents Required

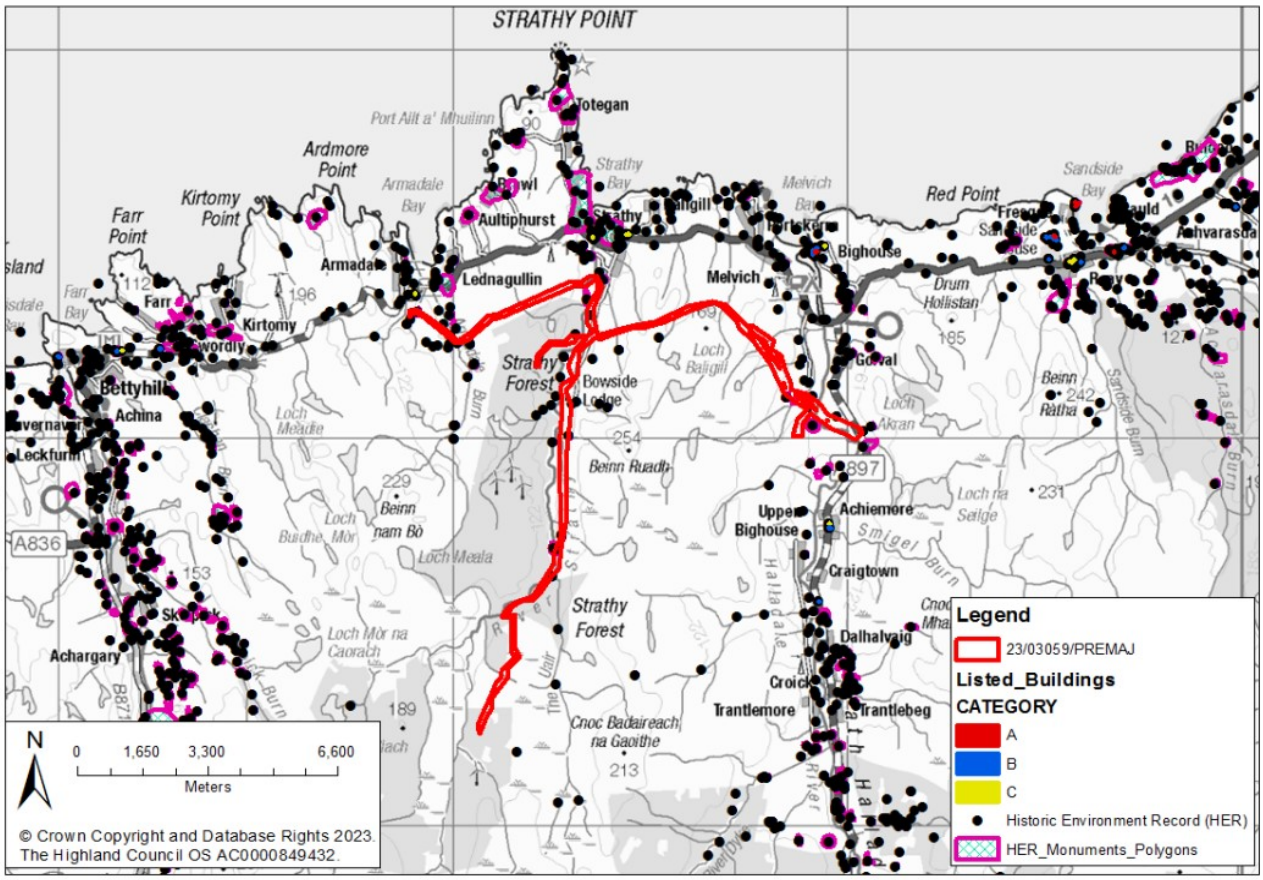
You are advised that the following will be required for the proposed development:
Planning Permission (Potential Strathy Switching Station)
Section 37 Consent (New overhead lines and connection works)

Site Constraints Map

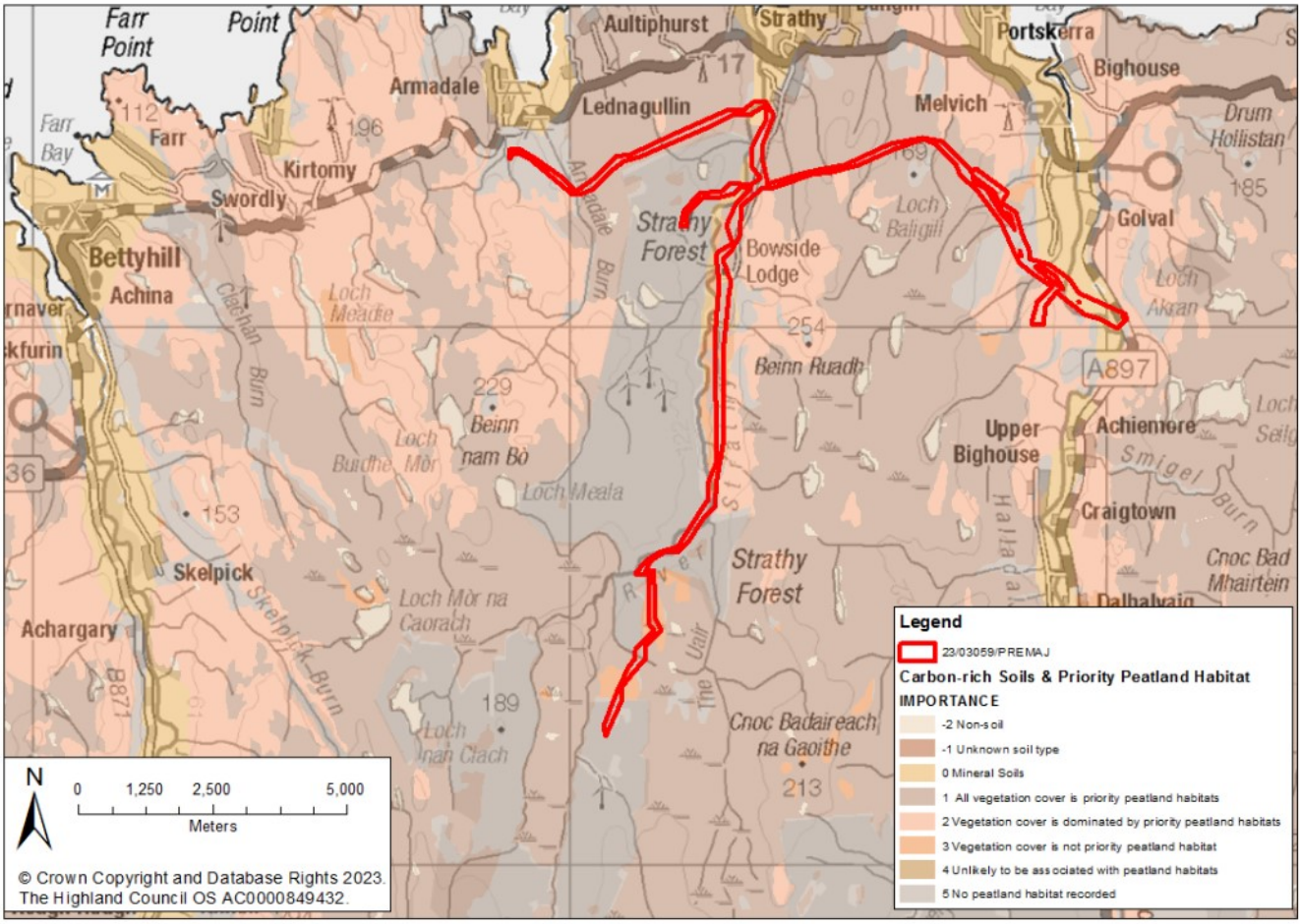
Access



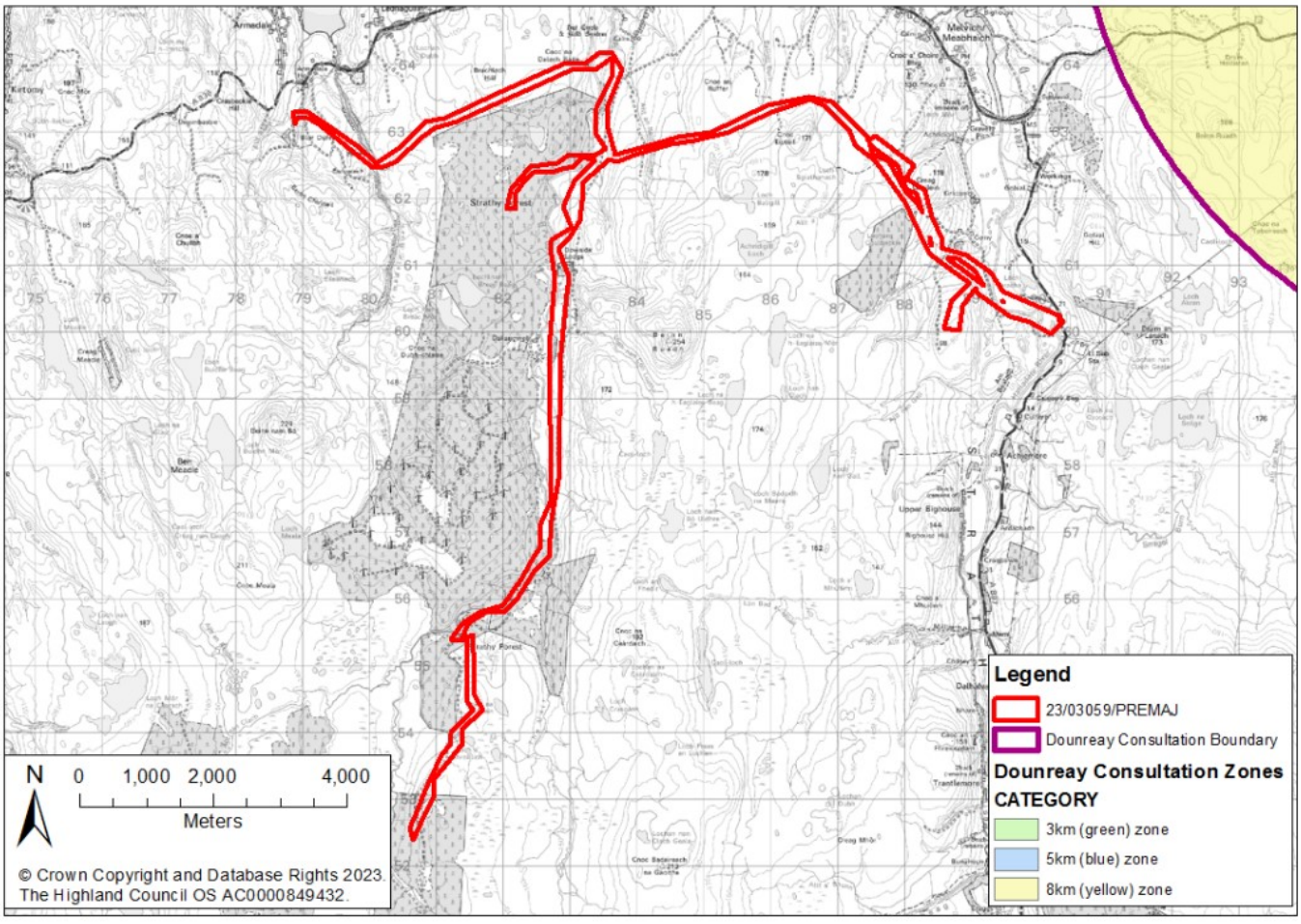
Built Heritage



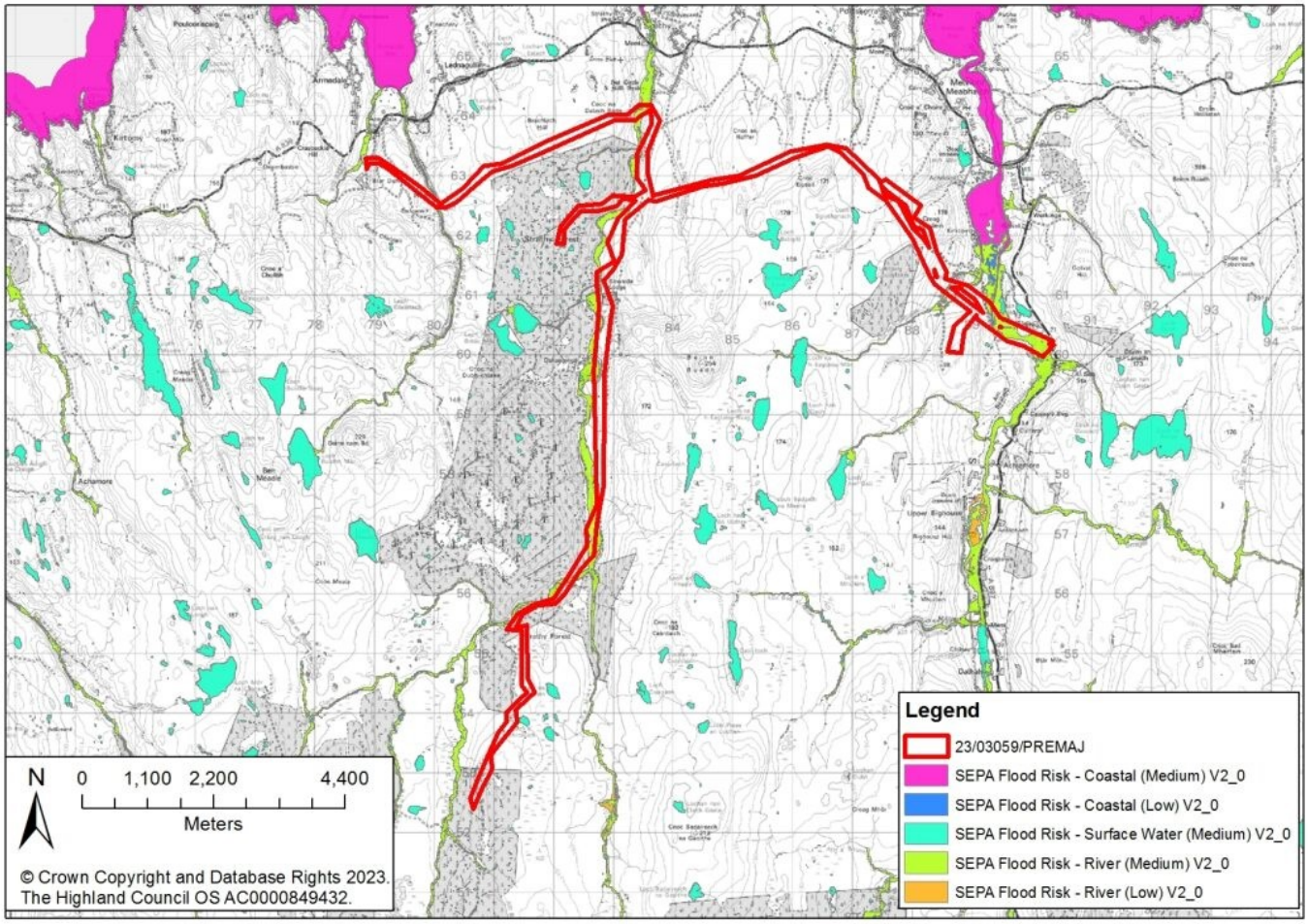
CPP



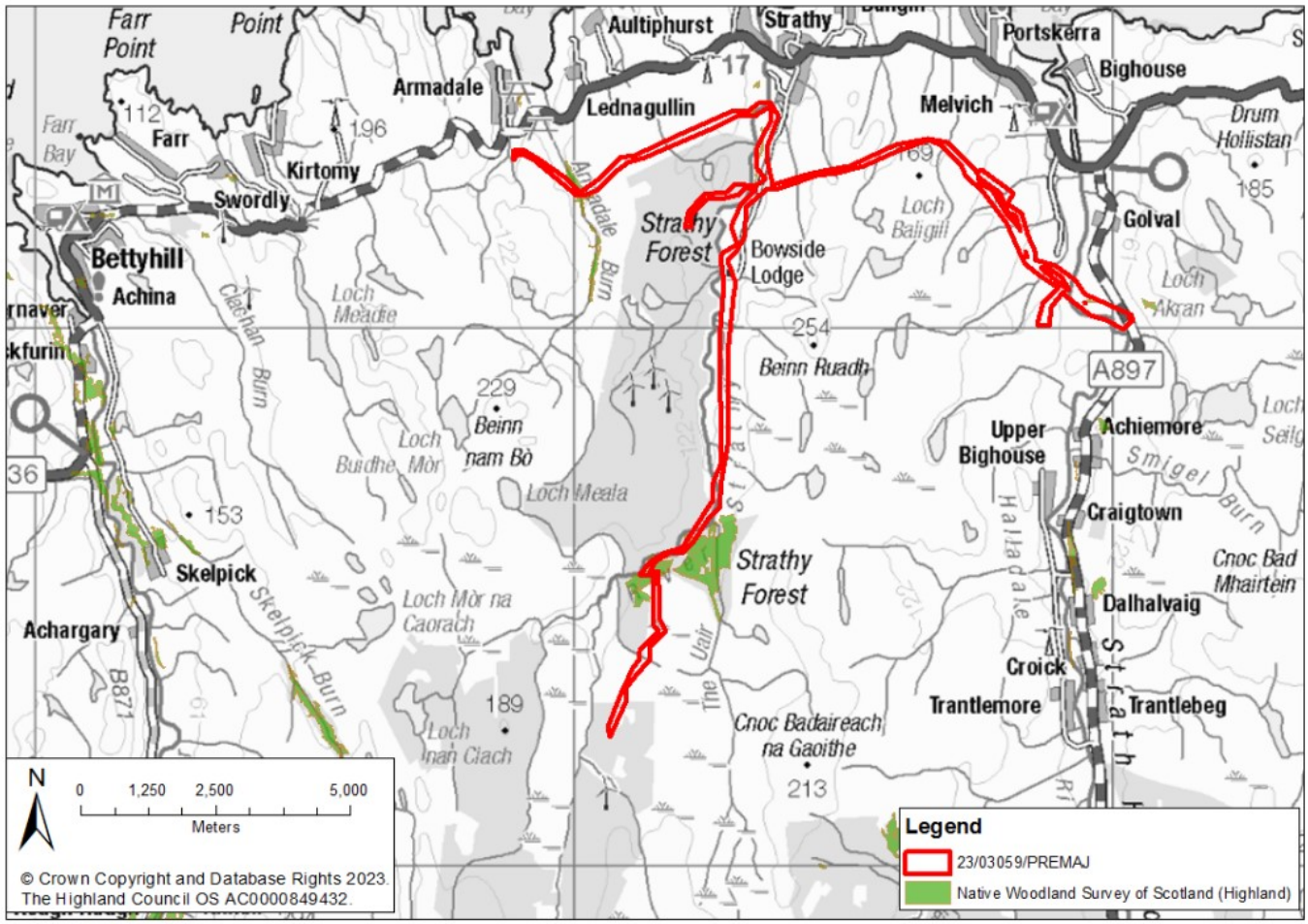
Dounreay Consultation Zones



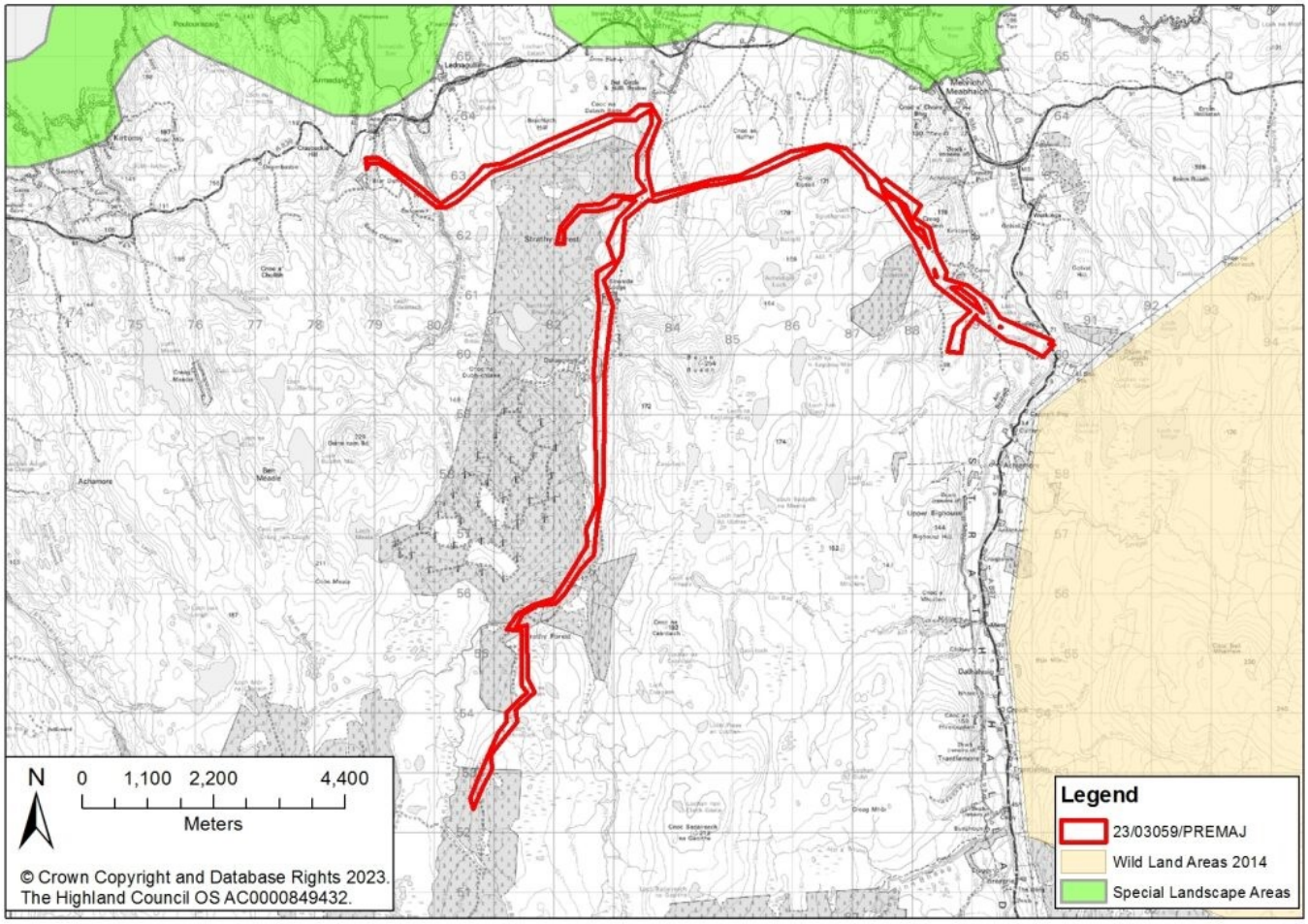
Flood Risk



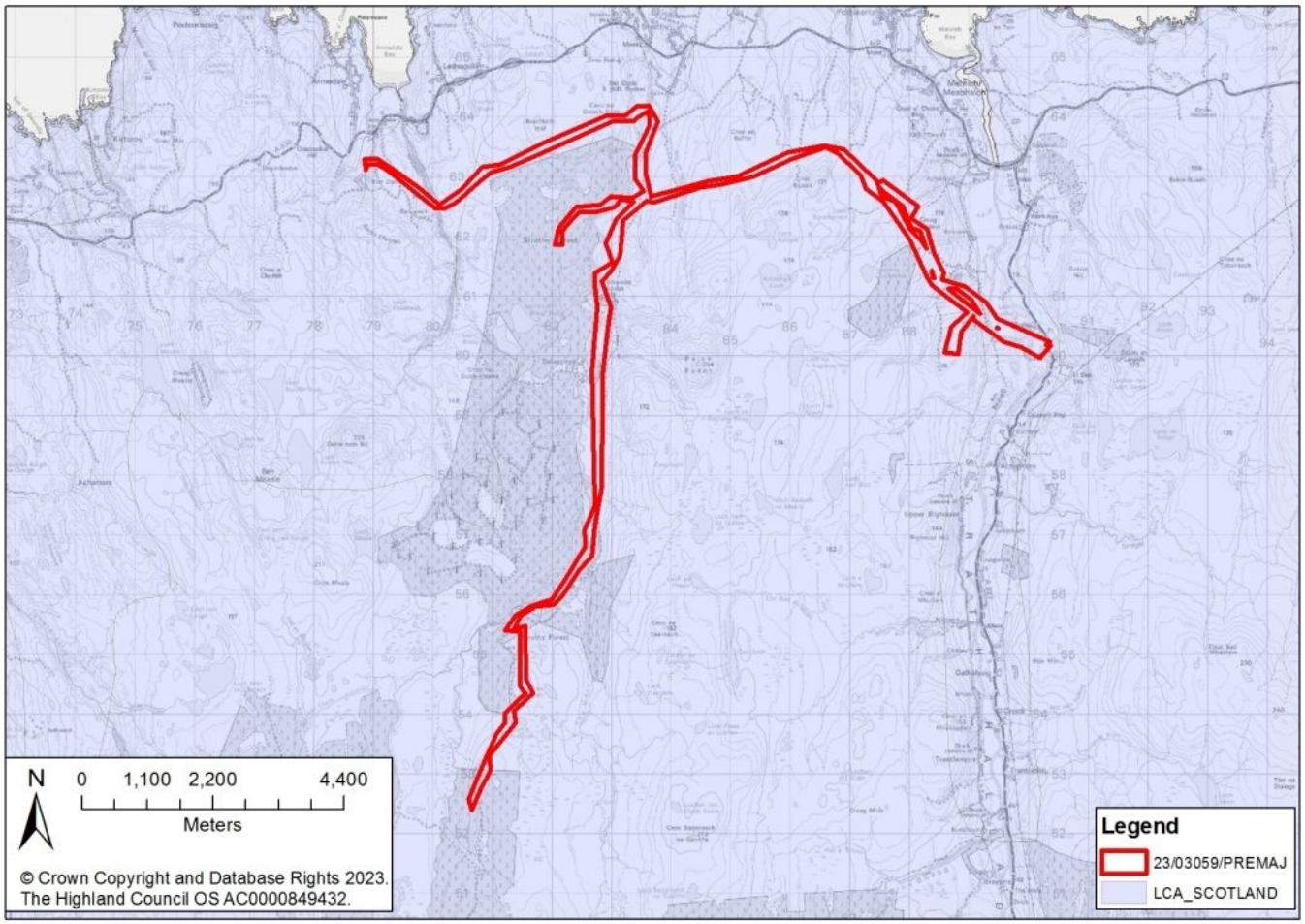
Forestry



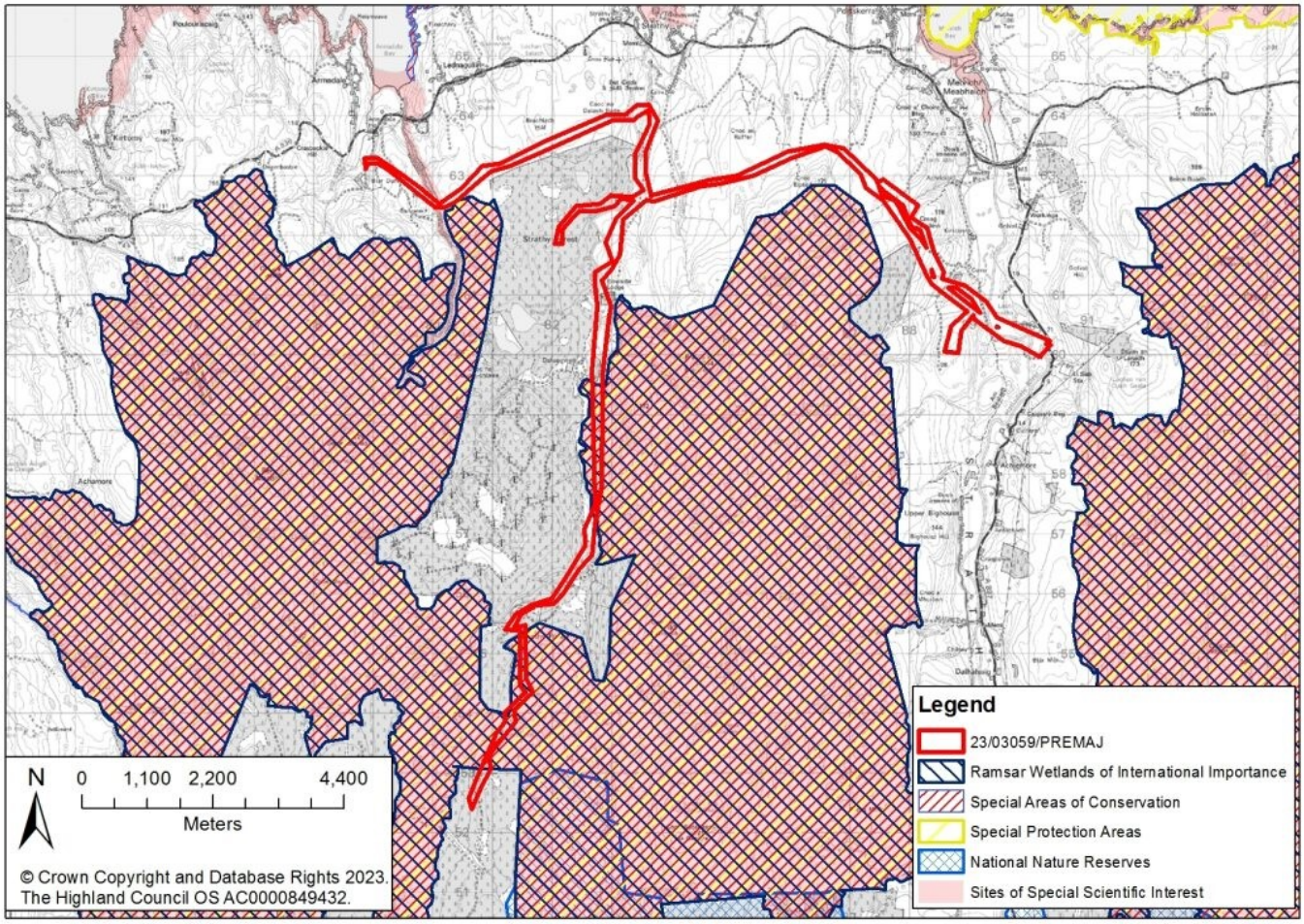
Landscape 1



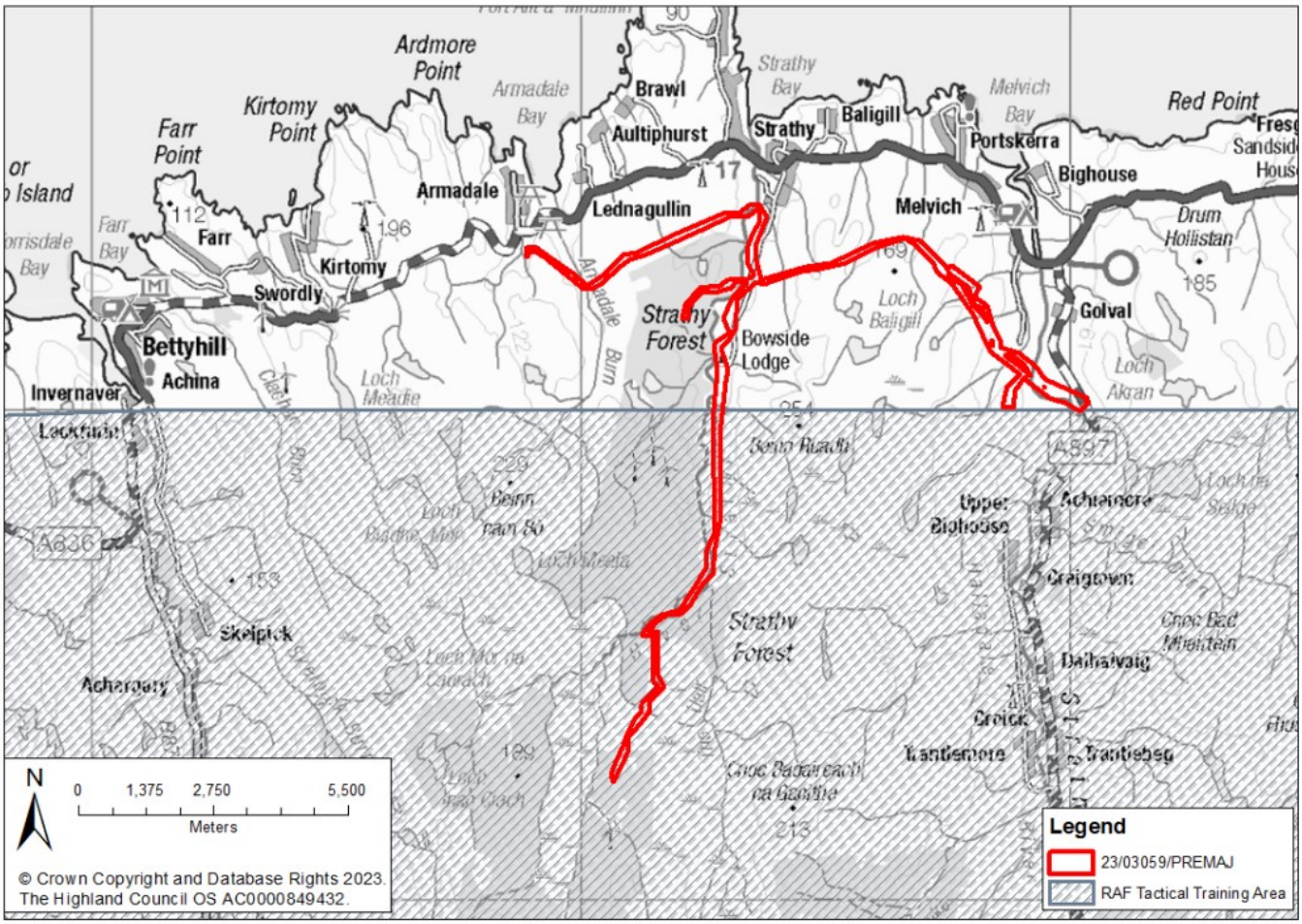
Landscape 2



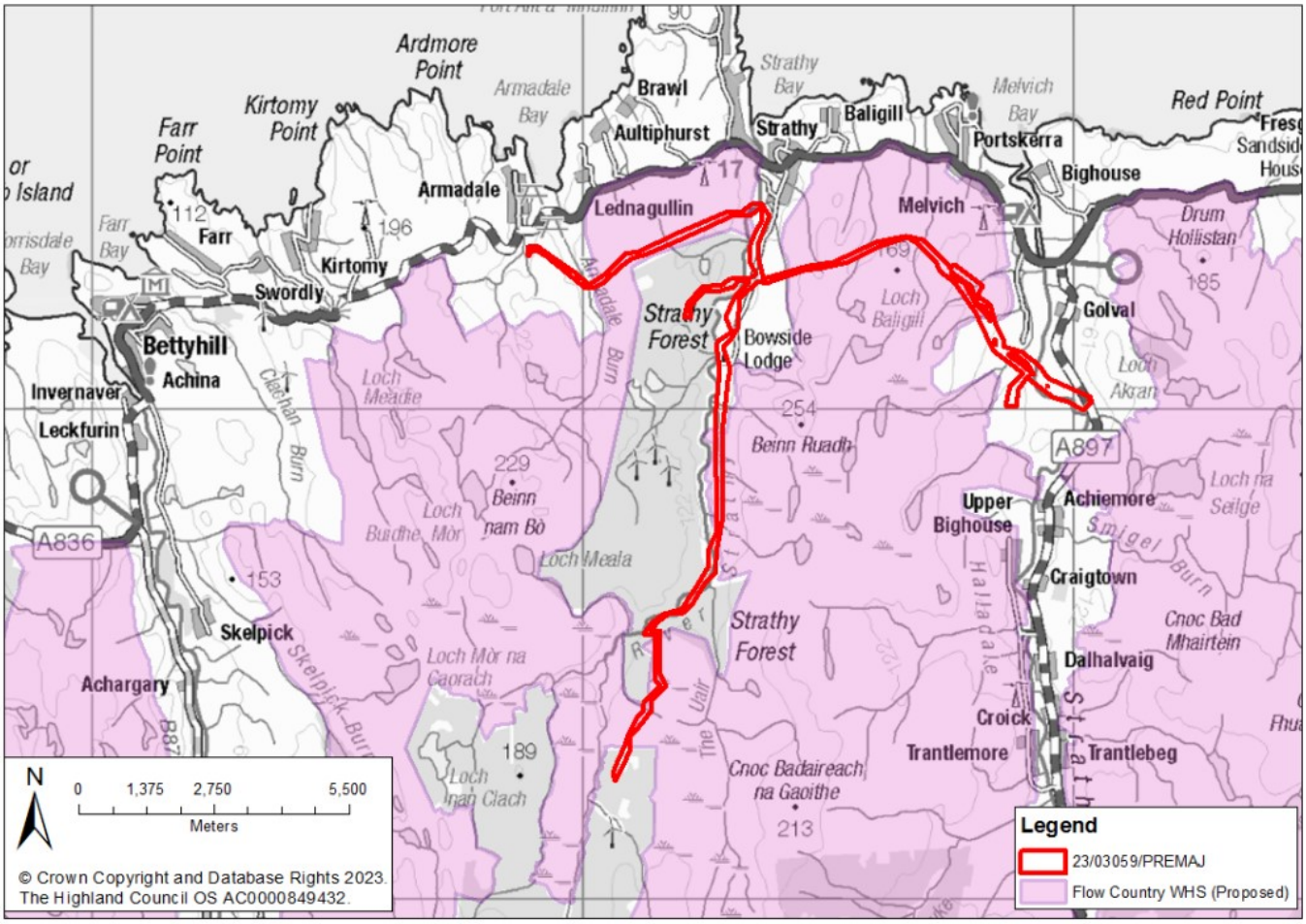
Natural Heritage Designations



RAF Tactical Training Area



The Flow Country Candidate World Heritage Site (Proposed)



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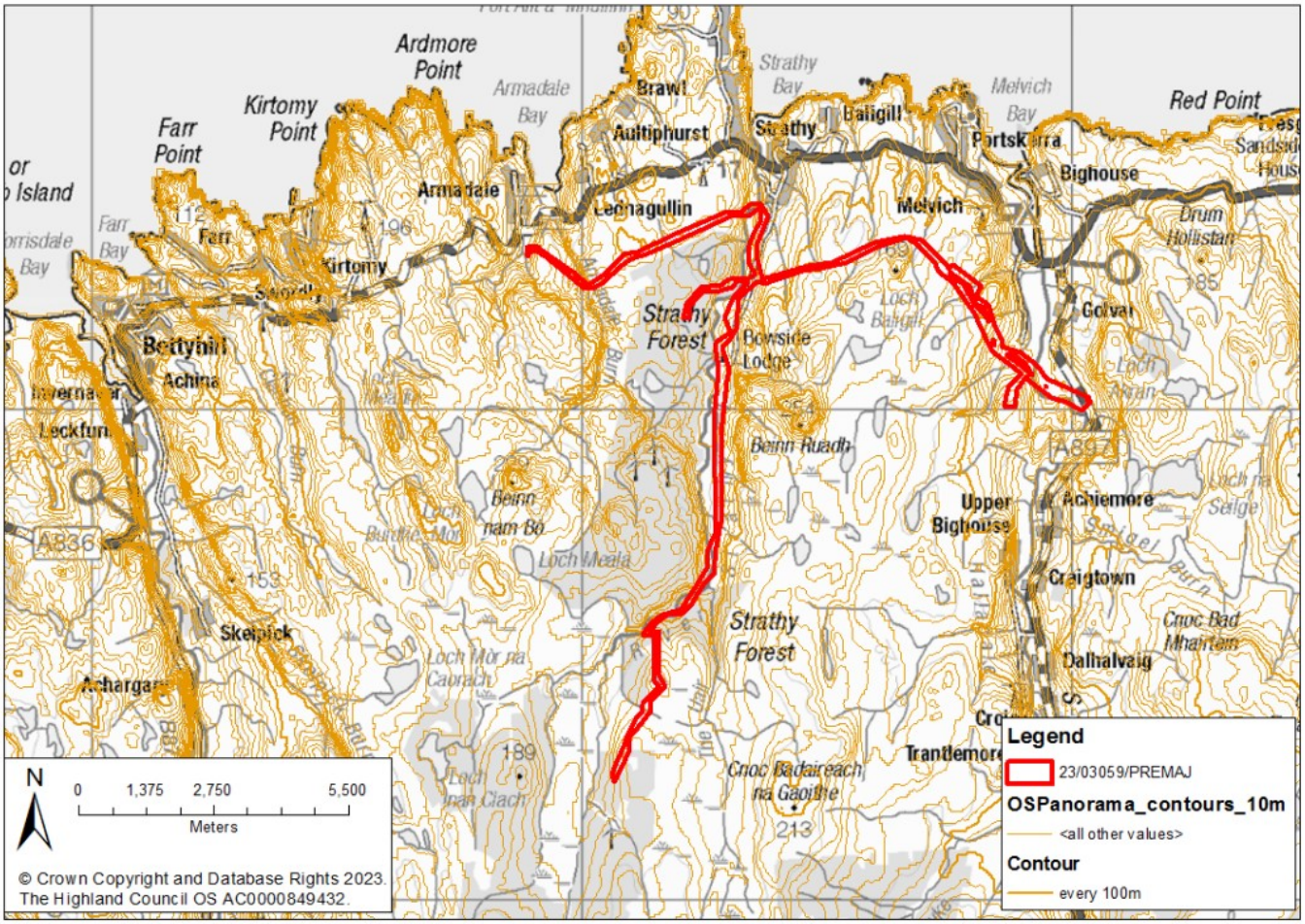

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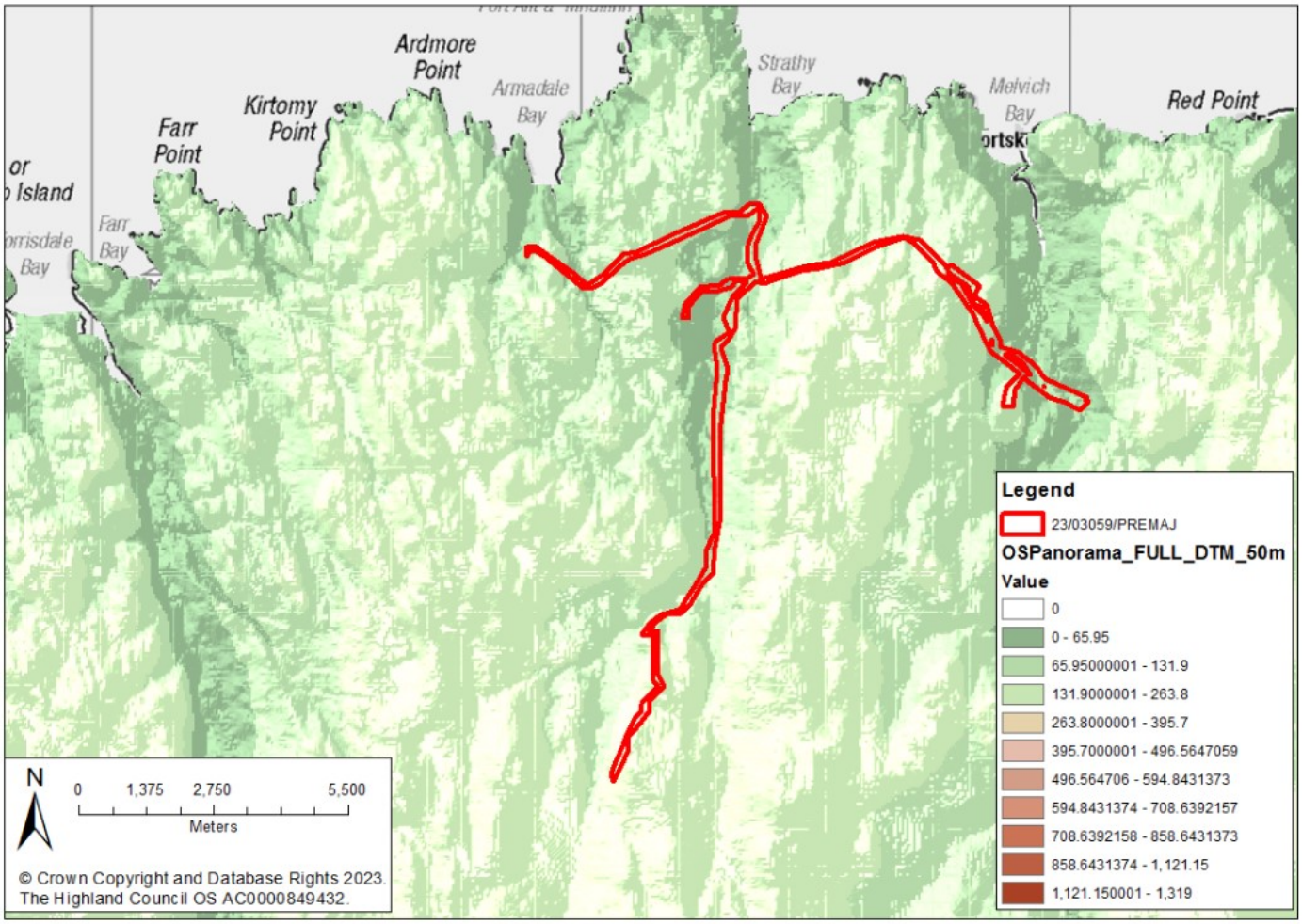
Ardmore Point
Armadale Bay
Strathy Bay
Melvich Bay
Red Point
Kirtomy Point
Farr Point
Farr Bay
Legend
23/03059/PREMAJ
OSPanorama_FULL_DTM_50m
Value
0
0 - 65.95
65.95000001 - 131.9
131.9000001 - 263.8
263.8000001 - 395.7
395.7000001 - 496.5647059
496.564706 - 594.8431373
594.8431374 - 708.6392157
708.6392158 - 858.6431373
858.6431374 - 1,121.15
1,121.150001 - 1,319
N
0
1,375
2,750
5,500
Meters
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The Highland Council OS AC0000849432.

Supporting Information Requirements			
Abnormal Load Assessment	X	Open Space Strategy	
Access Management Plan	X	Operational Noise Assessment	X
Arboricultural Impact Assessment		Peat Depth Survey and Management Plan	X
Archaeological Site Investigations	X	Planning Statement	X
Assessment of Impact on Historic Environment	X	Pre-Application Consultation Report	
Aviation Impact Assessment		Private Water Supplies/Mitigation scheme	X
Borrowpit Management Plan	X	Protected Habitat Survey	X
Carbon Balance Assessment		Protected Species Survey	X
Compensatory Planting Plan		Restoration / Decommissioning Plan	
Construction Noise Assessment	X	Retail Impact Assessment	
Construction Traffic Management Plan	X	Schedule of Mitigation	X
Contaminated Land Report		Shadow Flicker Assessment	
Design and Access Statement		Street Elevations	
Development Brief		Structural Survey	
Drainage Impact Assessment	X	Sustainable Design Statement	X
Dust Survey	X	Swept Path Analysis	
Electric Car Charging Strategy		Transport Assessment	X
Flood Risk Assessment	X	Transport Statement	X
Forest Residual Waste Strategy		Tree Constraints Plan	X
GWDTE Assessment	X	Tree Protection Plan	X
Habitat Management Plan	X	TV / Radio Impact Assessment	
Landscape and Visual Impact	X	Vibration Assessment	
Landscape Maintenance/Management Plan		Visualisations	X
Landscape Plan		Waste Strategy	
Masterplan		Other (Please Specify):	

Planning Policy

National Planning Framework (NPF) 4

Policy 3 - Biodiversity
Policy 4 - Natural Places
Policy 6 - Forestry, woodland and trees
Policy 7 - Historic assets and places
Policy 11 - Energy
Policy 22 - Flood risk and water management
Policy 25 - Community wealth building
Policy 29 - Rural Development

Highland-wide Local Development Plan (Adopted 2012)

Policy 28 - Sustainable Design
Policy 29 - Design Quality & Place-making
Policy 51 - Trees and Development
Policy 52 - Principle of Development in Woodland
Policy 56 - Travel
Policy 57 - Natural, Built & Cultural Heritage
Policy 58 - Protected Species
Policy 61 - Landscape
Policy 64 - Flood Risk
Policy 67 - Renewable Energy Developments
Policy 69 – Electricity Transmission Infrastructure

Caithness and Sutherland Local Development Plan (CaSPlan) (Adopted 2018)

The Plan confirms the position of the Special Landscape Areas within its boundary.

Highland Council Supplementary Guidance

Developer Contributions (November 2018)
Flood Risk & Drainage Impact Assessment (Jan 2013)
Green Networks (Jan 2013)
Highland Historic Environment Strategy (Jan 2013)
Highland's Statutorily Protected Species (March 2013)
Highland Renewable Energy Strategy & Planning Guidelines (May 2006)
Physical Constraints (March 2013)
Roads and Transport Guidelines for New Developments (May 2013)
Special Landscape Area Citations (June 2011)
Standards for Archaeological Work (March 2012)
Sustainable Design Guide (Jan 2013)
Trees, Woodlands and Development (Jan 2013)

Policy Appraisal

Development Plan Policy

The Development Plan comprises National Planning Framework 4 (NPF4), the Highland-wide Local Development Plan (HwLDP), the Caithness and Sutherland Local Development Plan (CaSPlan) and relevant supplementary guidance.

National Planning Framework 4 (NPF4)

NPF4 was adopted on 13 February 2023 and is now part of the Development Plan. It replaces National Planning Framework 3 and Scottish Planning Policy. Full details of NPF4 are available on the Scottish Government website.

NPF4 comprises three distinct parts:

Part 1 - sets out an overarching spatial strategy for Scotland in the future. Outlining that Scotland is facing unprecedented challenges and that we need to reduce greenhouse gas emissions and embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, and build a wellbeing economy while striving to create great places. Therefore, NPF4 sets out that choices need to be made about how we can make sustainable use of our natural assets in a way that benefits communities.

NPF4 outlines 18 national developments that support the plan's spatial strategy, of which six support the delivery of sustainable places. Among these is national development number 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure, which "supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply." National development number 3 accords national development status to electricity transmission that includes b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more, and/or c) New and/or upgraded Infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations. This proposal aligns with parts of both b) and c) and therefore, is classed as a national development.

The spatial strategy reflects existing legislation by setting out that decision making requires to reflect the long-term public interest. However, in doing so, it is clear that the decision maker must make the right choices about where development should be located, ensuring clarity is provided over the types of infrastructure that need to be provided and the assets that should be protected to ensure they continue to benefit future generations. To that end, the Spatial Priorities support the planning and delivery of sustainable places, which will reduce emissions, restore and better connect biodiversity; create liveable places, where residents can live better, healthier lives; and create productive places, with a greener, fairer, and more inclusive wellbeing economy.

Part 2 - sets out the National Planning Policy which cover three themes: Sustainable Places, Liveable Places, and Productive Places; within which there are a total of 33 policies and many of these consist of distinct sub-policies. These 33 national planning policies form part of the development plan and will be assessed along with the Council's LDP policies for development management decisions. The most relevant policies are outlined below.

Part 3 - provides a series of annexes that provide the rationale for the strategies and policies of NPF4, which outline how the document should be used, and set out how the Scottish Government will implement the strategies and policies contained in the document. With Annex A: 'How to use this document' noting that the policies within Part 2 should be read as a whole and '…it is for the decision maker to determine what weight to attach to policies on a case-by-case basis….' It goes on to state that '…where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies….'.

Many of NPF4's policies are relevant to consideration of the proposal, but attention is particularly drawn here to the following policies:

Policy 3 (Biodiversity) intends to protect biodiversity, reverse biodiversity loss, deliver positive effects and strengthen nature networks. It should be noted that under NPF4 Policy 3, every development proposal has to maintain or improve the net biodiversity of a site.

Policy 4 (Natural Places) intends to protect, restore and enhance natural assets making best use of nature-based solutions.

Policy 6 (Forestry, woodland and trees) intends to protect and expand forests, woodland and trees.

Policy 7 (Historic assets and places) intends to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.

Policy 11 (Energy) intends to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and

distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).

Policy 22 (Flood risk and water management) intends to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.

Policy 23 (Health and Safety) intends to protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

Policy 25 (Community wealth building) intends to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. While NPF4 considers national developments as a focus for delivery, they should also be exemplars of the community wealth building approach to economic development.

Policy 29 (Rural Development) intends to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

Highland-wide Local Development Plan (HwLDP) (2012)

HwLDP was adopted in 2012 and sets out a range of planning policies applicable for the whole Highland Council area. HwLDP continues to be used alongside NPF4, until it is replaced by a new-style LDP. The Council notes that legislation indicates that if there is incompatibility between the LDP and the NPF, whichever is the more recent shall prevail. That requirement does not take away from the fact that the HwLDP must, whilst still part of the adopted Development Plan, be part of the consideration and a number of policies could be relevant.

Note: The Council began a review of HwLDP, with the publication of the Main Issues Report in September 2015 and subsequent consideration of comments in 2016. In December 2017 the Scottish Government published a Planning Bill outlining potential changes to the Scottish planning system. The Council took the decision to halt the HwLDP Review until more was known about the changes. The Planning (Scotland) Act 2019 was subsequently made and details of the new arrangements in the Act for Development Plans were finalised in 2023. Applicants are advised to monitor the annual Development Plans Newsletter(www.highland.gov.uk/developmentplansnewsletter) as this provides a timetable of work on the new-style, single Highland Local Development Plan (HLDP).

Caithness and Sutherland Local Development Plan (CaSPlan) (2018)

The Highland Council Area Local Development Plan covering the proposed site is the Caithness and Sutherland Local Development Plan. This plan's focus is on the regional and settlement strategies for Caithness and Sutherland and identifies specific site allocations and as such, much of the content of CaSPlan is not directly relevant to an energy transmission proposal. However, certain aspects of the strategies for the local area and settlements may highlight priorities for the local area that should be taken into consideration when designing the development, or help to inform plans for community engagement and/or community benefit. CaSPlan confirms boundaries (including any refinements) of the Special Landscape Areas (SLAs) within the plan area. The SLA citations webpage provides the most up to date information on SLAs.

www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

The preparation of a new-style Highland Local Development Plan (HLDP)

Having noted the above background: broadly speaking it is likely that through 2023 we will focus primarily on evidence-gathering for the new HLDP, with the tentative programme including an Evidence Report in quarter 3 2024 and subsequent Gate Check, with Proposed Plan stage in 2025. We may issue an update to our Development Plans Newsletter (www.highland.gov.uk/developmentplansnewsletter) in late autumn 2023 with any updates to timescales. The HLDP will, once adopted, replace all our current LDPs. As part of this programme of work, the Council will review the coverage and content of its current suite of Supplementary Guidance, to establish which aspects should be covered within the new Local Development Plan itself, which aspects should be covered within non-statutory planning guidance and any aspects no longer required.

The HwLDP policies that will be particularly key to this proposal include:

Policy 51: Trees and Development

Policy 52: Principle of Development in Woodland

Policy 55: Peats and Soils – The proposal is located in an area featuring Carbon Rich Soils, Deep Peat and Priority Peatland Habitat (CPP) (see map enclosed in pack). CPP is a nationally important mapped environmental asset that indicates where the resource is likely to be found and detailed peat assessment will be required to guide development away from the most sensitive areas and to help inform potential mitigation. 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. This general approach is without prejudice to the advice given elsewhere in the pack regarding statutorily designated natural heritage sites and The Flow Country candidate World Heritage Site.

Policy 57: Natural, Built and Cultural Heritage

Policy 58: Protected Species

Policy 61: Landscape

Policy 63: Water Environment

Policy 64: Flood Risk

Policy 66: Surface Water Drainage

Policy 69: Electricity Transmission Infrastructure - Proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption. Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features. In locations that are sensitive, mitigation may help to address concerns and should be considered as part of the preparation of proposals. This may include, where appropriate, underground alternatives to overground route proposals. Where new infrastructure provision will result in existing infrastructure becoming redundant, the Council will seek the removal of the redundant infrastructure as a requirement of the development.

Policy 77: Public Access

Policy 78: Long Distance Routes

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 Council encourage the inclusion of electric car charging facilities within all new developments. A strategy for the provision of charging points within the development should be submitted with the application.

Natural Heritage

Landscape Considerations

HwLDP Policy 61 Landscape

Policy 61 of the HwLDP requires new development to reflect the landscape characteristics and special qualities identified in the relevant, refreshed and published (2019) Nature Scot (formerly SNH) Landscape Character Assessments. The Landscape Character Assessments 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.

Much of the proposed site sits within an area of Landscape Character Type (LCT) LCT134 Sweeping Moorland and Flows, with a small area of the proposal to the east in LCT142 Strath and a small area of the proposal to the west in LCT136 Rocky Hills & Moorland. Located outwith, but in the vicinity of the proposed red line boundary are Landscape Character Types: LCT 144 Coastal Crofts & Small Farms, LCT 140 Sandy Beaches & Dunes, LCT 141 High Cliffs and Sheltered Bays.

www.nature.scot/professional-advice/landscape/landscape-character-assessment

Landscape Sensitivity
Within your landscape and visual impact assessment (LVIA), consideration of sensitive receptors will need to include those who reside in the area (including residential amenity assessment) and those who visit it, with receptor locations particularly including areas of settlement, transport routes, and visitor and recreational attractions and routes. If you proceed towards application then detailed information and assessment will be required in due course, in order to establish the significance of any impacts. You are encouraged to explain the design iterations throughout the process and how they have responded to assessment of impacts.

Special Landscape Areas
Proposals must have regard to the citations for SLAs that summarise key characteristics, qualities, sensitivities, and measures for enhancement. These citations will be used to assess impacts of proposals. For the avoidance of doubt, the proposed site is not located within an SLA, but it is in the vicinity of Farr Bay, Strathy and Portskerra SLA.
www.highland.gov.uk/downloads/file/2937/assessment_of_highland_special_landscape_areas

Ecology

Ecology Assessment
NatureScot will lead on protected areas and priority peatlands.

At this stage limited ecological/environmental information has been submitted relating to the proposed extension and therefore I cannot give detailed advice on the ecological/environmental aspect of the proposal

A full assessment of the ecology of the site and a suitable buffer around the site needs to be undertaken to determine if there are any ecological/environmental constraints associated with the
proposed development. The assessment should include (but not be limited to):

- Desk study records, from NatureScot Sitelink, the NBN atlas, local biodiversity record groups and Highland Raptor Study Group;
- Specific surveys of the site to identify any protected species, priority habitats and priority species, including those listed within the Highland Nature Biodiversity Action Plan to fulfil Policies 57-60 of the Highland Wide Local Development Plan and NPF4 Policy 4f;
- Full ornithology assessment, including breeding, migrating and wintering bird species.
- Assessment of ecological impacts; and
- Relevant mitigation and compensation measures.

Notes:
Surveys should be undertaken by a suitably qualified and experienced Ecologist.

NaturesScot's guidance on surveying protected species should be followed https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species

Policies 57-60 of the Highland Wide Local Development Plan (HwLDP) pertain to the protection of certain species and habitats within the Highland region that must be considered for any

developments.

https://www.highland.gov.uk/info/178/development_plans/199/highlandwide_local_development_plan

The Highland Nature biodiversity Action Plan (HNBAP) lists priority species and habitats that are considered to be important within the Highland region. These priority species and habitats must be given consideration for any developments.

https://www.highlandenvironmentforum.info/biodiversity/action-plan/

Peatland
The site is located partly within peatland, therefore the proposed development will need to accord with Policy 5 of the NPF4. A Peat Management Plan will be required for the proposed development, considering the criteria specified within Policy 5.

Nature Scot's peatland, carbon-rich soils and priority peatland habitats in development management guidance states that restoration of peatland should be a 1:10 restoration level with an additional 10% to provide enhancement measures.

https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management

Biodiversity Enhancement
National Planning Framework 4 (NPF4) was formally adopted on the 13th of February 2023 and is a material consideration for this development. As this is a major development, Policy 3b is applicable and requires biodiversity enhancement of the site post-construction in addition to mitigation and compensation measures.

Biodiversity Enhancement and Management
In order to satisfy Policy 3b a Habitat Management Plan (HMP) that details how criteria i to v will be met, will be required in addition to the EIA/EcIA. This will demonstrate that the development will significantly enhance the biodiversity of the site, from its pre-development state. Where the HMP is unable to demonstrate to the satisfaction of the planning authority that the development will conserve, restore and enhance biodiversity, the proposal will not be supported.

The HMP must demonstrate to the satisfaction of the planning authority that the development will accord with Policies 57-60 of the HwLDP and should include, where possible and appropriate, enhancements measures for HNBAP priority species and habitats. The HMP will be carried out by a suitably qualified and experienced consultant and it is recommended that a Biodiversity Net Gain Metric (BNG) is used to demonstrate a recommended minimum 10% increase of the biodiversity of the site post construction. It is recommended that the English Nature BNG Metric is used to determine the biodiversity enhancement, and this should be included within the planning application.

We would be happy to discuss these enhancement proposals prior to submission.

World Heritage Site
The Flow Country World Heritage Site (WHS) nomination was submitted by the UK Government to UNESCO on the 1st of February 2023 and is therefore amaterial consideration for this development. Although it is currently at the nomination stage the precautionary principle must be applied to protect this resource based upon its criteria for nomination. The nomination is supported at the local, national and UK level.

This site is considered for WHS status due to "The Flow Country property being the most outstanding example of a blanket bog ecosystem in the world". The peatland, its ecosystem processes, bird and plant assemblages make up the Outstanding Universal Value (OUV) of the proposed WHS. If any of these attributes are compromised then the OUV is impacted. For a WHS to maintain its integrity it must:

a) include all elements necessary to express its Outstanding Universal Value
b) be of adequate size to ensure the complete representation of the features and processes which convey the property's significance (as laid out in the attributes)

c) not suffer from adverse effects of development and/or neglect

National Planning Framework 4 policy 7I states "Development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved".

In addition to the blanket bog habitat "The Flow Country also provides a globally significant natural habitat for an internationally important assemblage of specialist biodiversity. The area supports a unique and distinctive assemblage of birds, with a combination of arctic-alpine, temperate and continental species not found anywhere else in the world".

World Heritage Site Assessment

This proposal lies partly within and close to of the WHS boundary and therefore has the potential to impact the WHS. The OUV must be assessed, particularly the ornithology and peatland attributes.

This development may significantly impact the setting characteristic of the WHS. The setting will be clearly defined upon inscription of the WHS and is therefore a material consideration of this proposal. The setting considers the experiential aspect of the WHS and therefore developments must be in keeping with the existing built environment surrounding the WHS.

The UNESCO WHS toolkit should be used to assess any developments that may impact the WHS. https://whc.unesco.org/en/guidance-toolkit-impact assessments/

It is unlikely that we would support an application that impacts the Outstanding Universal Value of the WHS or its setting characteristics.

Peatland - SEPA

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

SEPA would very much welcome further early engagement with the developer as the project develops and more information is known about the layout. SEPA encourages the developer to keep in contact via planning.north@sepa.org.uk.

SEPA would especially welcome the opportunity to provide advice on a draft layout once peat probing and habitat survey has been carried out and when more is known about supporting infrastructure.

SEPA directs the applicant to their standing advice – which is available from www.sepa.org.uk/media/594101/sepa-triage-framework-and-standing-advice.pdf. This advice covers most of the issues in relation to SEPA's interests for this development and we provide limited site specific advice in this case.

In this case, where it is clear that much of the site is likely to be peatland and/or wetland, SEPA suggests you go straight to carrying out National Vegetation Classification survey (NVC) survey and peatland condition mapping.

In order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals avoid peatland in near natural condition and minimise the total area and volume of peat disturbance. It should clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable and avoidance of peat > 1m depth.

In this case, where much of the site is on peat, SEPA expects the application to be supported by a comprehensive site specific Peat Management Plan and Habitat Management Plan (HMP)including:

• Proposals for reuse of disturbed peat in habitat restoration;
• Details of restoration to compensate for the area of peatland habitat directly and indirectly impacted by the development;

• Proposals for peatland enhancement in other areas;
• Monitoring proposals.

Provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses SEPA do not foresee from current information a need for detailed information on flood risk

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

Where proposals are on peatland or carbon rich soils the following should be submitted to address the requirements of NPF4 Policy 5:

a. layout plans showing all permanent and temporary infrastructure, with extent of excavation required, which clearly demonstrates how the mitigation hierarchy outlined in NPF4 has been applied. These plans should be overlaid on:
   - peat depth survey (showing peat probe locations, colour coded using distinct colours for each depth category and annotated at a usable scale)
   - peat depth survey showing interpolated peat depths
   - peatland condition mapping
   - National Vegetation Classification survey (NVC) habitat mapping.

b. an outline Peat Management Plan (PMP).
c. an outline Habitat Management Plan (HMP)

Detailed advice

a. **Development design in line with the mitigation hierarchy**

In order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals:

- Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories;
- Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth;
- Minimise impact on local hydrology; and
- Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of the Peatland Survey – Guidance on Developments on Peatland (2017).

The Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. This should be used to identify peatland in near natural condition and can be helpful in identifying areas where peatland restoration could be carried out.

In line with the requirements of Policy 5d of NPF4, the development proposal should include plans to restore and/or enhance the site into a functioning peatland system capable of achieving carbon sequestration.

a. **The outline PMP should also include:**

- Information on peatland condition.
- Information demonstrating avoidance and minimisation of peat disturbance.
- Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.
- Proposals for temporary storage and handling.
- Reuse volumes in different elements of site reinstatement and restoration.

Handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, re-profiling/ landscaping, spreading, mixing with mineral soils or use in bunds.

Disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations outwith the development boundary).

The faces of cut batters, especially in peat over 1m, should be sealed to reduce water loss of the surrounding peat habitats, which will lead to indirect loss of habitat and release of greenhouse gases. This may be achieved by compression of the peat to create an impermeable subsurface barrier, or where slope angle is sufficiently low, by revegetation of the cut surface.

a. **The outline HMP should include:**

- Proposals for reuse of disturbed peat in habitat restoration, if relevant.
- Details of restoration to compensate for the area of peatland habitat directly and indirectly impacted by the development.
- Outline proposals for peatland enhancement in other areas of the site.
- Monitoring proposals.

To support the principle of peat reuse in restoration the applicant should demonstrate that they have identified locations where the addition of excavated peat will enhance the wider site into a functional peatland system capable of achieving carbon sequestration. The following information is required:

- Location plan of the proposed peatland re-use restoration area(s), clearly showing the size of individual areas and the total area to be restored.

- Photographs, aerial imagery, or surveys to demonstrate that the area identified is appropriate for peat re-use and can support carbon sequestration. This should include consideration of an appropriate hydrological setting and baseline peatland condition.

In addition, if any proposed re-use restoration areas are outwith the ownership of the applicant, information should be provided to demonstrate agreement in principle with the landowner, including agreed timescales for commencement of the works, and proposed management measures to ensure the restored areas can be safeguarded in perpetuity as a peatland.

NatureScot's technical compendium of peatland restoration techniques provides a useful overview of the procedural and technical requirements for peatland restoration.

Design

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.

Amenity

Noise Impacts

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 or 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.

Operational Noise
It is not anticipated that noise will be a significant issue once the development is operational. However, the developer is advised to give due consideration to the siting and installation of any potential noise sources such as heating, refrigeration and ventilation plant.

Further Noise Considerations
It is unlikely that the above requirements will need to be fully implemented due to the remote nature of some of the locations. Consideration shall be given to where noise sensitive properties are located. It is expected that construction noise mitigation and traffic flow etc will be detailed in the proposed EIA.

Once operational the main noise source will be the low frequency sounds from the pylons however again due to the remote location this is not perceived to be of concern. However the applicant may wish to provide noise data from other operational sites that may assist with this determination.

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.

Contaminated Land
There is no comment on the above application in terms of any known potential contaminated land issues within the site boundary of the proposed development.

Transport and Wider Access

Impact on the Trunk Road Network - Transport Scotland
The proposed development comprises the provision of a 132 kV grid connection for five consented and / or proposed wind farms to the existing transmission network at Connagill 275 / 132 kV substation. The five wind farms are as follows:

- Consented Strathy South Wind Farm (208MW)
- Consented Strathy Wood Wind Farm (62.4MW)

- Proposed Armadale Wind Farm (85.4MW)
- Proposed Melvich Wind Farm (57.6MW)
- Proposed Kirkton Wind Farm (52.8MW)

The supporting information states that the initial preferred technology solution for the connection of each wind farm was via OHL supported by trident H wood pole, however, from a technical, operational and environmental perspective, it is no longer the optimal solution to have separate wood pole OHLs running in parallel to connect each wind farm to the transmission network, and extensive further review has been carried out to identify a rationalised approach. The preferred solution involves a combination of 132 kV trident wood pole OHL, 132 kV OHL supported by steel structure, 275 kV OHL supported by steel structure and 132 kV underground cable connection. The preferred route for each section of the connection lies to the south of the A836, with no proposals to cross any trunk road. The nearest trunk road to the route is the A9(T) at Thurso, which lies approximately 27km to the northeast.

Transport Scotland would state that a threshold assessment in line with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic will be required to determine whether there are likely to be any significant environmental issues associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment.

Impact on the Local Road Network – Highland Council Transport Planning Team

Proposed Development
The proposed development comprises the provision of a 132 kV grid connection for five consented and / or proposed wind farms to the existing transmission network at Connagill 275 / 132 kV substation. The preferred solution involves a combination of 132 kV trident wood pole OHL, 132 kV OHL supported by steel structure, 275 kV OHL supported by steel structure and 132 kV underground cable connection. The preferred route for each section of the connection lies to the south of the A836.

The Highland Council maintained local public roads that may be affected by the proposals are the A836, A839, U1733 and U1796.

Supporting Information
Supporting information Transport Planning would generally expect to be submitted with any future planning application is listed below:

- Transport Assessment
- Construction Traffic Management Plan
- Abnormal Load Assessment

For information and guidance please refer to the Councils Roads and Transport Guidelines for New Developments' Guidelines.

Impact of the Development
Transport Planning's interest will relate largely to the impact of development traffic on the local road network during the construction phase of the project. The impacts of development traffic may include; impact on road carriageway, verges and associated structures; and impact on road users and adjacent communities.

Transport Assessment
The Transport Planning Team would generally expect a new up to date Transport Assessment to be submitted with any future planning application and a **High National Traffic Forecast** be applied.

Prior to preparation of the Transport Assessment, the applicant should undertake a detailed scoping exercise in consultation with the Council's Transport Planning Team and Transport Scotland.

The information below is not exhaustive and should be used as a guide to submitting all relevant information in relation to roads, traffic and transportation matters arising from the development proposals, which should be in the form of a Transport Assessment forming part of the Environmental Statement submission.

1. Identify all public roads affected by the development. In addition to transportation of all abnormal loads & vehicles (delivery of components) this should also include routes to be used by local suppliers and staff. It is expected that the developer submits a preferred access route for the development. All other access route options should be provided, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process to arrive at a preferred route.

2. Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:

- Assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required.
- Road surface condition and profile
- Assessment of structures and any weight restrictions
- Road widths, vertical and horizontal alignment and provision of passing places
- Details of adjacent communities

3. Determine the traffic generation and distribution of the proposals throughout the construction and operation periods to provide accurate data resulting from the proposed development including

- Nos. of light and heavy vehicles including staff travel
- Abnormal loads
- Duration of works

4. Current traffic flows including use by public transport services, school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.

5. Impacts of proposed traffic including

- Impacts on carriageway, structures, verges etc.
- Impacts on other road users
- Impacts on adjacent communities
- Swept path and gradient analysis where it is envisaged that transportation of traffic could be problematic
- Provision of Trial Runs to be carried out in order to prove the route is achievable and/or to establish the extent of works required to facilitate transportation

6. Cumulative impacts with other developments in progress and committed developments including other Renewable Energy projects.

7. Proposed mitigation measures to address impacts identified in 5 above, including

- Carriageway strengthening
- Strengthening of bridges and culverts
- Carriageway widening and/or edge strengthening
- Provision of passing places
- Road safety measures
- Traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.

8. Details of residual effects.

Abnormal Load Assessment

The Transport Assessment should include an Abnormal Load Assessment of the roads utilised to convent abnormal loads to the site. The assessment will need to confirm the proposed port of entry for AIL components and justify the adequacy of the route for transporting them to the site. Early discussion with the Council's abnormal loads team by emailing abnormal.loads@highland.gov.uk) and the Council's structures team by emailing structures-section@highland.gov.uk.

Detailed Junction Design

Details of any new / existing site access should be clearly set out on dimensioned drawings related to OS data and include confirmation of geometry, construction form, drainage details to prevent water running out onto the public road and evidence that appropriate visibility splays can be achieved. Vehicle swept paths should also be provided to evidence that the proposed junction form will be suitable for its intended use. Details of reinstatement of any temporary site access at its junction with the public road, post construction is also required. Appropriate junction arrangements and visibility splay information can be found in our published Roads and Transport Guidelines for New Developments.

Construction Traffic Management Plan

The Transport Assessment should include a framework Construction Traffic Management Plan aimed at minimising the impact of construction traffic. It shall include measures to ensure development traffic adheres to the approved routes and establish protocols for the movement of HGV's on minor roads. Measures to address the cumulative effect of construction traffic from other developments utilising the same route/s should be included. Routes that can and can't be used by construction traffic from this development should be clarified.

Consultation with the local community and Local Area Roads Office will be required regarding the detailed content and implantation of the Construction Traffic Management Plan.

Mitigation

Mitigation required may include; new or improved infrastructure, road safety measures and traffic management arrangements. All works on the public local road network will require the approval of the Council as Roads Authority through a Road Construction Consent together with any necessary Technical Approval for structures. Therefore, detailed and dimensioned plans showing the mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.

Early consultation with the Council's Structures Section is recommended with regard to affected Council maintained structures on the routes to the site.

Section 96 Agreement

Notwithstanding the above requirements, there will remain a risk of damage to the Council maintained roads from construction related traffic. In order to protect the interest of the Council, as the Roads Authority, a suitable agreement relating to Section 96 of the Roads (Scotland) Act 1984 and appropriate planning legislation may be necessary. An appropriate Road Bond or similar security may also be required.

Public Access

Access control infrastructure (fences, gates etc.), which are to be retained after construction, should be designed so the public may access land/tracks as would be expected by rights provided in the Land Reform (Scotland) Act 2003. Gates for control of vehicles, deer or stock should be provided with side public use gates to BS5709. Access rights will be exercisable on new tracks.

Water Environment and Flood Risk

Flood Risk – Highland Council Flood Risk Management Team

There are a number of watercourses present within, or adjacent to, the application site boundary. Development or landraising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Where any permanent infrastructure will be located in close proximity to a watercourse or waterbody, a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding, will remain operational during a flood event, and will not increase flood risk elsewhere. SEPA's *Technical Flood Risk Guidance for Stakeholders* outlines the information required to be submitted as part of a Flood Risk Assessment.

Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures.

Where possible a minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted.

Further advice and SEPA's best practice guidance are available within the water engineering section of SEPA's website. *https://www.sepa.org.uk/regulations/water/engineering/*
Guidance on the design of water crossings can be found in Construction of River Crossings Good Practice Guide. *http://www.sepa.org.uk/media/151036/wat-sg-25.pdf*

Drainage - Highland Council Flood Risk Management Team
A Drainage Impact Assessment (DIA) for the development is required. 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 also 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 plus climate change 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.

Refer to the Council's *Flood Risk and Drainage Impact: Supplementary Guidance* for further detailed requirements.

Water – SEPA
Development or landraising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close proximity to a watercourse a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. SEPA's Technical flood risk guidance for stakeholders outlines the information require to be submitted as part of a Flood Risk Assessment:
https://www.sepa.org.uk/media/162602/ss-nfr-p-002-technical-flood-risk-guidance-for-stakeholders.pdf

Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding. Further information must be provided to justify any smaller structures.

A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted.

Further advice and SEPA's best practice guidance is available within the water engineering section of SEPA's website:
https://www.sepa.org.uk/regulations/water/engineering/

Guidance on the design of water crossings can be found in Construction of River Crossings Good Practice Guide:
http://www.sepa.org.uk/media/151036/wat-sg-25.pdf

Built and Cultural Heritage

Impact on the Historic Environment - Historic Environment Scotland
We understand that the proposal is to construct and operate a 132 kV grid connection for five consented and/or proposed wind farms to the existing transmission network at Connagill

275 / 132 kV substation.

The supporting information states that the initial preferred technology solution for the connection of each wind farm was via overhead line (OHL) supported by trident H wood pole, however, from a technical, operational and environmental perspective, it is no longer the optimal solution to have separate wood pole OHLs running in parallel to connect each wind farm to the transmission network, and further review has been carried out to identify a rationalised approach. The preferred solution involves a combination of 132 kV trident wood pole OHL, 132 kV OHL supported by steel structure, 275 kV OHL supported by steel structure and 132 kV underground cable connection.

Armadale Wind Farm Connection

Having reviewed the limited information provided in the presentation we have significant concerns over one element of the proposals - the route for the OHL between the proposed Armadale Wind Farm and the T-in connection to the 275kV OHL. We understand that the OHL in this area would be carried on trident H-wood poles of between 16-18m in height rather than on taller steel structures. All of the proposed route options for the Armadale connection pass in close proximity to the scheduled monument known as **Armadale Burn, broch 1420m SE of Armadale House (SM13678)**. In particular routes A1b, A3a and A3b all run in very close proximity to the scheduled monument. However, even the routes which are furthest from the monument, A1a and A2, are still in relative proximity to the monument.

The Armadale Burn broch scheduled monument has a sensitive setting which takes in commanding views north and south along the gully of the Armadale Burn but also to the north and west across the rolling landscape of Blàr Dubh the plain of ground between Armadale Burn to the east and Beinn Chuldail to the west and encompassing the slopes of Cromsac Hill to the north.

We have only recently removed our objection to the proposed Armadale Wind Farm development due to the potential impacts on the setting of the Armadale Burn broch scheduled monument. Our objection was removed following changes to the design of the scheme to reduce the level of impacts on the setting of the scheduled monument.

There is therefore the potential for the proposed overhead line to have significant adverse impacts on the sensitive setting of the Armadale Burn broch scheduled monument. The preferred route identified in the presentation, route A1b, has the potential to impact on two key factors of the setting of the broch, views out to the north along the gully and the views out over and relationship with the Blàr Dubh plain. It is not yet clear from the level of information provided whether it would be possible to accommodate an OHL along this route without causing significant adverse impacts on the integrity of the setting of the scheduled monument and thereby raising issues of national interest for our remit.

We note that two other route options, A3a and A3b, follow the same route as the preferred route A1b past the scheduled broch and are therefore likely to raise the same issues. Routes A1a and A2 are located further to the north of the scheduled monument and may have lesser impacts on the setting of the monument. However, at this stage and based on the information provided it is not yet clear what level of impact these options would have on the setting of the broch.

The potential for cumulative impacts on the setting of the scheduled monument from the OHL in combination with the proposed wind farm should also be considered as there is the also the potential for significant cumulative impacts.

We would require further information to provide more certain advice and visualisations showing the potential impacts of both the preferred route and the alternative route options further to the north on the setting of the scheduled monument will be required. We recommend that further consultation with HES is undertaken as early as possible to ensure that a route option is selected which would not give rise to impacts that might require us to object to the proposals.

Other wind farm connections

The proposed preferred route options for the remaining wind farm connections in the Connagil cluster do not appear to present the same significant issues for our remit based on the information provided so far.

We note that there will be a requirement for a steel structure 275kV OHL along the majority of the route in an area where currently the OHLs are wood pole structures. There are a number of designated historic

environment assets within our remit in the wider surrounding area that should be assessed to determine whether the proposals may impact on their settings. We recommend that a ZTV is used in the first instance to determine whether the proposed OHLs would have the potential to impact on their settings. The potential for cumulative impacts from the proposed OHLs along with the proposed wind farms in the cluster should also be assessed.

Whilst the preferred routes appear likely to avoid significant adverse impacts on the setting of assets, some of the alternative route options presented could potentially present greater impacts. In particular the proposed northern alternative option for the route from Strathy North to Connagill would bring the route option considerably closer to the category A listed Bighouse, garden pavilion and walled garden (LB7160). Route option 5 for the Strathy South to Strathy North route has the potential to have significantly greater impacts on the setting of designated assets along Strath Halladale such as The Borg, broch, Strath Halladale (SM1839) and Millburn, Strath Halladale, barrows 340m NNE of (SM13622). There would also be the potential for significant cumulative impacts with existing OHLs along this route option.

As noted above we recommend that early consultation is undertaken with HES in order to avoid the selection of route options that might present consenting issues at later stages.

We recommend that advice is also sought from your own archaeological and conservation advisors regarding any potential impacts on undesignated archaeology and category B and C listed buildings.

Impact on the Historic Environment – Highland Council Historic Environment Team
The route options cross a landscape that is rich in upstanding remains, including prehistoric settlement features and extensive areas of upstanding prehistoric landscapes. There remains the potential for features or remains of prehistoric or later date to be present along the route/s. In addition, designated assets lie very close to the routes and careful consideration must be given as to any indirect impacts on these sites.

The Cultural Heritage chapter of the Environmental Statement will need to be undertaken by a professional and competent historic environment consultant. The ES chapter should include a full survey of the development area (including any land required for associated infrastructure). In this regard I would recommend that a study of available lidar survey, or a lidar survey carried out across this area, is carried out to inform the ES. 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.

Developer Contributions

The Council's Developer Contributions Supplementary Guidance will be used in the determination of planning applications and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. For the proposed development, the anticipated developer contribution requirements are outlined below. Please note that requirements can change over time and the exact amount payable will be confirmed at the point that a planning application is determined.

Pre-Application Procedures

Proposal of Application Notice
The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 require that for any major development pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation report. Further information is provided on the Council website, please see the Proposal of Application Notice section here

Public Consultation
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 https://www.pas.org.uk/.

Environmental Impact Assessment Screening

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 requires under Schedule 2, 3c, that transmission of electricity by overhead cables must be screened to determine whether an Environmental Impact Assessment (EIA) is required to support a planning application. This proposal is therefore required to be screened.

A formal request for a Screening Opinion/s should be made in writing to the Planning Authority. An EIA Screening Opinion form can be downloaded from the Councils website here. At present it is not possible to do this online.

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the *Strathy 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, Phil Tomalin can provide advice further in this regard if required. Contact details for all Community Councils can be found here.

Access

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

Sutherland Access Panel, 22 Strathnaver, Kinbrace, KW11 6UA. Telephone: (01641) 561209.

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

Application Procedures

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 Council's Major Application Team with a view to agreeing a Processing Agreement at the earliest possible opportunity. Contact details are provided in section 18 towards the end of this pack.

Councillors Code of Conduct

It would be beneficial for you to be familiar with the Councillors' Code of Conduct. This is available online at the Standards Commission for Scotland website.

Scheme of Delegation

All applications will be determined in line with the Council's Scheme of Delegation. It would be beneficial for you to familiarise yourself with the scheme. This is available online.

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 gaelic@highland.gov.uk

To download a copy of the Council's 'Using Gaelic in Signs' advice note, please visit: https://www.highland.gov.uk/downloads/file/11857/guidelines_on_the_use_of_gaelic_in_highland_council_services

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

Contacts	
Michael Kordas - Case Officer	Michael.Kordas@highland.gov.uk
Dafydd Jones - Area Planning Manager North	Dafydd.Jones@highland.gov.uk
Gillian Pearson - Team Leader	Gillian.Pearson@highland.gov.uk
Contaminated Land – Shirley Ross	Shirley.Ross@highland.gov.uk
Development Plans – Helen Bailey	Helen.Bailey@highland.gov.uk
Historic Environment Team	Kirsty.Cameron@highland.gov.uk
Environmental Health Officer – Philip Dent	Philip.Dent@highland.gov.uk
Flood Risk Management Team – Richard Bryan	Richard.Bryan@highland.gov.uk
Access Officer – Matt Dent	Matt.Dent@highland.gov.uk
Ecology Officer – Karen Couper	Karen.Couper@highland.gov.uk
Transport Planning – Fiona Nairn	Fiona.Nairn@highland.gov.uk
Transport Scotland – Gerard Mcphillips	Gerard.Mcphillips@transport.gov.scot
SEPA – Laura Seivwright	Laura.Seivwright@sepa.org.uk
Historic Environment Scotland – Victoria Clements	Victoria.Clements@hes.scot

Disclaimer

This advice is based on the information submitted and is given without prejudice to the future consideration of and decision on any application received by The Highland Council.

Pre-application case files are not publicly available but can be the subject of Freedom of Information and Environmental Information Regulations requests.

Useful Weblinks

The Highland Council Development Plans

https://www.highland.gov.uk/info/178/local_and_statutory_development_plans

Highland Council Supplementary and Development Guidance Listed by Category:

https://www.highland.gov.uk/directory/52/development_guidance

Siting and Design Quality:

THC Sustainable Design Guide
https://www.highland.gov.uk/directory_record/683409/sustainable_design

Roads/Access and Transport

More information on access and parking standards (incl. small housing developments) can be found at:
https://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/4

Access Panel

The Council encourages applicants at pre-application stage to engage with the local Disability Access Panel to consider accessibility improvements for physically disabled and sensory impaired people. The Highland Council have published a Planning Protocol for Effective Engagement with Access Panels, which you should take into consideration

Access Panels Contact Info-
https://www.highland.gov.uk/info/751/equality_diversity_and_citizenship/326/equality_and_diversity_contacts/4

Scottish Government

Scottish Government Building, Planning and Design Pages
https://www.gov.scot/building-planning-and-design/

Scottish Government Planning and Architecture Guidance
https://www.gov.scot/policies/planning-architecture/planning-guidance/

Scottish Planning Policy
https://www.gov.scot/publications/scottish-planning-policy/

Scottish Water

Contact Scottish Water for guidance on connections to the public water/drainage network:
https://www.scottishwater.co.uk/en/Business-and-Developers/Connecting-to-Our-Network/Pre-Development-Information/Planning-Your-Development

SEPA

You can find more information on SUDS at: https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/

You can view SEPA's small-scale developments guidance here:
https://www.sepa.org.uk/regulations/water/small-scale-sewage-discharges/

You can view SEPA's flood risk map here: https://www.sepa.org.uk/environment/water/flooding/flood-maps/

CAR Licensing - https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

Historic Environment

The Highland Historic Environment Record (HER) contains detailed information about listed buildings, conservation areas and archaeological sites in the Highland area:
http://her.highland.gov.uk

General advice on development affecting historic designations can be found at:
https://www.historicenvironment.scot/advice-and-support/

Protected Species -SNH

More information on Scotland's protected species and areas can be found at:
https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species

https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-protected-areas

Trees and Woodland

The Scottish Government's woodland strategy and associated polices can be found here:
https://forestry.gov.scot/support-regulations/control-of-woodland-removal

The Council's guidance on tree/woodland issues can be found here:
http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/63/trees_and_forestry/