Corriemoillie Wind Farm

Planning Statement

E.ON Climate & Renewables
UK Developments Limited

28 September 2010

Our Ref:   SAE1857

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Date: 28 September 2010

Project File Path: W:\1857SAE - Corriemoillie Windfarm - Glasgow\admin\Reports\Planning Statement 19.08.10.doc

Status: Final

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EXECUTIVE SUMMARY

Given the combined imperatives of the need to combat climate change, to provide energy security and meet rising energy demands, the requirement to develop new renewable energy sources is now clearly accepted within the UK and Scottish Government’s energy policies.

In recognition of Scotland’s natural endowment the Scottish Government has set an ambitious target for renewable energy, requiring 50% of the demand for Scottish electricity to be supplied from renewable sources by 2020, with an interim milestone of 31% targets by 2011. To ensure that these targets are met, Scottish Planning Policy confirms the Scottish Ministers support for renewable energy generation. It requires that the planning system makes positive provision for such developments, while at the same time ensuring that renewable energy developments are appropriately located to protect the environment and local communities.

The proposed Wind Farm is for a 19 turbine wind farm development at Corriemoillie, approximately 7km northwest of Garve in Ross and Cromarty East, Highland. On the basis of an average of 30% output, the proposed Wind Farm would have the capacity to produce approximately 133.15 GWh per annum and would therefore make a valuable contribution to achieving the Scottish Government’s renewables targets.

The location of the proposed Wind Farm represents a site eminently suitable for wind farm development as it:

- benefits from exposure to higher than average wind speeds;
- is not subject to any European designations such as Special Areas of Conservation, Special Protected Areas or Ramsar sites or areas designated as being of nature conservation importance;
- does not lie within any National Scenic Areas, Regional Scenic Areas or Areas of Great Landscape Value;
- is located in an isolated location with very few residential properties in proximity; and
- is well located in proximity to electricity grid infrastructure.

The layout and design of the proposed Wind Farm has undergone a number of design iterations in order to minimise, and where possible avoid, potential adverse impacts on the environment and local communities whilst at the same time maximising the significant wind resource of the local area. Indeed, this planning application represents a revised scheme to an application previously submitted to the Highland Council in November 2009. The main difference between this revised scheme and the scheme previously submitted is the use of the consented site access for Lochluichart Wind Farm rather than the use of the access track previously proposed to the south of the site. The key benefits of this revision are the avoidance of the need to significantly upgrade the southern forestry haul road and reducing the length of track required to access the proposed Wind Farm.

The Environmental Statement submitted in support of this application establishes that the proposed Wind Farm will not result in any unacceptable impacts on environmental resources and communities. On the basis of the Environmental Statement it is therefore considered that the site of the proposed Wind Farm is an appropriate and sustainable location.

Furthermore, the proposed Wind Farm complies with the detailed criteria set out in the Development Plans for Ross and Cromarty East for renewable energy developments, and conforms to other relevant policies in respect of issues such as landscape quality, nature conservation and rural diversification. In addition, the proposed Wind Farm is also found to be acceptable in relation to other material considerations, including national planning policy and advice.

Overall, it is therefore concluded that the proposed Wind Farm is acceptable in planning terms and meets the requirements of the Scottish Government to deliver more electricity from renewable energy sources.
1. INTRODUCTION

The Application

1.1 This Planning Statement has been prepared by RPS on behalf of E.ON Climate and Renewables UK Developments Limited (E.ON) to accompany this planning application for the construction and operation of a 19 turbine wind farm at Corriemoillie (herein after referred to as 'the proposed Wind Farm').

1.2 The purpose of this Planning Statement is to provide an assessment of the proposed Wind Farm in relation to development plan policy and other material considerations. It considers the policy of the UK and Scottish Governments towards renewable energy development and the benefits that will arise from the construction and operation of the proposed Wind Farm.

1.3 The proposed Wind Farm constitutes a Schedule 2 development under the Environmental Impact Assessment (Scotland) Regulations 1999 (the EIA Regulations). An Environmental Statement (ES) has been prepared to accompany the planning application. This Planning Statement does not form part of the ES. However, reference is made to the conclusions of the ES in assessing the proposed Wind Farm against the provisions of the development plan and relevant material considerations.

1.4 As the proposed Wind Farm constitutes a Major Development under the Town and Country (Hierarchy of Developments) Scotland Regulations 2009, E.ON have carried out structured pre-application consultation. A Pre-Application Consultation Report has been prepared to accompany this application which details the consultation that was undertaken, the comments made, and how these comments have influenced the proposed Wind Farm.

The Applicant

1.5 E.ON has taken a leading role in the development of wind power in the UK since 1991, when they invested in their first wind farm. They now operate 20 wind farms – 17 onshore and 3 offshore – and have recently completed Robin Rigg in the Solway Firth, which is one of the largest offshore wind farms in Europe. E.ON has already built and is operating two wind farms in Scotland, namely Bowbeat in the Scottish Borders and Deuchran Hill near Carradale in Argyll and Bute.

1.6 E.ON is one of the only UK wind farm developers currently certified to the internationally recognised environmental management standard, ISO 14001, and as such places a great emphasis on the proper management of environmental risk during construction of its wind farms.
2. THE PROPOSED WIND FARM

Site Location

1.7 The site of the proposed Wind Farm is located at Corriemoillie, approximately 7km northwest of Garve in Ross and Cromarty East, Highland. The location of the proposed Wind Farm is adjacent to the site of the consented Lochluichart Wind Farm (see Figure PS1).

1.8 The total area of the site of the proposed Wind Farm is approximately 419 hectares (excluding access track) and its highest point is 410m Above Ordnance Datum (AOD). The area surrounding the proposed Wind Farm is dominated by moorland and areas of plantation forest. Loch Glascarnoch is approximately 2km to the north of the site boundary and Lochluichart is located 3km to the south of the site boundary.

1.9 The A835 is approximately 1.5km north of the application site and the A832 approximately 2km south of the application site. There are no properties located on or within 2km of the site of the proposed Wind Farm.

Site History/Site Selection

1.10 E.ON operates a process by which it identifies available portfolios of land which have either passed the initial stages of feasibility for development as a wind farm or have been identified by the seller as having potential for wind development.

1.11 The site of the proposed Wind Farm at Corriemoillie was previously scoped by Scottish Power in 2003 but not taken forward to development. E.ON bought the rights to the project in 2005 and carried out initial feasibility work and some further consultations before the project was put on hold in mid 2006 as a more detailed assessment of the wind regime was conducted. E.ON recommenced work on the project in 2008.

1.12 A planning application (ref 09/00693/FULRC) for Corriemoillie Wind Farm was submitted by E.ON to The Highland Council in November 2009. This application was subsequently withdrawn in September 2010. The main difference between the original scheme and this revised scheme is the use of the consented site access for the Lochluichart Wind Farm rather than the upgrading of the forestry haul road to the south of the application site. In addition, the temporary construction compound and laydown area and the control building have been relocated in this revised scheme and two additional borrow pits have been identified. A detailed comparison of the original and revised scheme is contained within Chapter 2 – Approach to EIA of the ES. The main reasons for the changes to the original scheme include avoiding the need to significantly upgrade the forestry haul road and reducing the length of track required to access the proposed Wind Farm. It is therefore considered that the revised scheme now represents the optimal layout for the site and that the landscape and visual impacts previously associated with the upgrading of the southern forestry haul road have now been completely mitigated.

The Proposed Wind Farm

2.1 The proposed Wind Farm is for a 19 turbine wind farm at Corriemoillie Forest. All turbines are located to meet technical criteria on minimum spacing and land gradients and also to take account of existing environmental constraints.

2.2 The proposed Wind Farm comprises the following:

- erection of 19 three bladed horizontal axis wind turbines of maximum dimension 80m hub height, 125m height to blade tip and 93m rotor diameter;
- 5 borrow pits;
- meteorological mast of maximum 80m height;
- control building;
• a crane hardstanding area at each turbine base;
• upgrade of existing access tracks;
• construction of new access tracks providing access to all turbine locations; and
• transformers and cables from the wind turbines to the control building.

2.3 In addition, the site preparation and construction phases of the proposed Wind Farm will also involve the following elements:

• clear felling of the majority of Corriemoillie Forest;
• temporary construction compound; and
• temporary laydown area.

2.4 The locations of the turbines and associated infrastructure are shown on Figure PS2. Full details on each of these elements are contained with Chapter 3 – Project Description of the ES.

2.5 As outlined above, the proposed Wind Farm will be accessed using the consented access track for Lochluichart Wind Farm off the A835 north of the site. This access junction has been assessed as being appropriate for the proposed vehicles as part of the EIA for the Lochluichart scheme.

2.6 The access tracks on the site of the proposed Wind Farm will, as far as possible, utilise existing tracks which will be widened and extended. In order to access the site and the site infrastructure, approximately 9.5km of new access track will be constructed and 1.6km upgraded.

2.7 Forestry operations necessary for site preparation will take place for 6 to 12 months and will use the existing forestry haul road to the south of the application site from the A832 at approximately 235828E, 863603N. Forestry operations are Permitted Development through The Town and Country Planning (General Permitted Development) (Scotland) Order 1992 and consequently this forestry haul road is not included within the boundary of the application site and is not discussed in detail within the ES or this Planning Statement.

2.8 Construction of the proposed Wind Farm would take between 12 and 15 months, including commissioning and initial land reinstatement. The turbine components will be delivered to the site by specialist low loader vehicles from Invergordon port via the A9 and the A835. Construction of the proposed Wind Farm will only take place after the construction of Lochluichart Wind Farm is complete in order to avoid potential cumulative traffic impacts. Construction activities will be between the hours of 0800-1800 Monday to Friday and 0900-1200 on Saturdays.

2.9 The grid connection will be via an underground cable to an existing 132kV double circuit overhead line which runs approximately 3km to the south of the application site. Environmental assessments of the section of the grid connection route between the application site and the connection point have been carried out as part of the EIA. However the grid connection will be the subject of a separate Section 37 application and deemed planning consent from the Scottish Ministers and as such is not discussed in detail within the ES or this Planning Statement.

2.10 Consistent with best practice, consultation feedback from statutory consultees and the public were taken into consideration during the iterative windfarm design process for the proposed Wind Farm. During July 2009, public exhibitions were held for local residents. Another public exhibition was held in August 2010 to display the conjoined access track. E.ON attended Community Council meetings in October 2009 and August 2010 to provide updates on the proposed Wind Farm, to address any remaining concerns and to advise of the likely timetable for the proposed Wind Farm.

2.11 The installed capacity of the proposed Wind Farm will be up to a maximum of 416.1 GWh of electricity per annum, assuming all turbines are operating at full potential for 24 hours a day at optimum wind speed. However, due to natural variations in wind velocity the capacity factor or output from a wind farm is approximately 30% of the maximum output. On the basis of an approximate 30% output, the proposed Wind Farm would have the capacity to produce approximately 133.15 GWh per annum.
2.12 The operational life of the proposed Wind Farm would be 25 years. At the end of the 25 year operational period the proposed Wind Farm will be decommissioned and the site reinstated as approved by The Highland Council and relevant statutory consultees. Information relating to decommissioning of the proposed Wind Farm will be outlined within a Decommissioning Plan, which will be submitted to the appropriate authorities prior to cessation of operations. Decommissioning will involve:

- dismantling and removal of the wind turbines and above ground electrical equipment;
- reinstatement of ground above the wind turbine foundations;
- demolition and removal of the control building and compound; and
- electrical cables will be cut off below ground level, de-energised and left in the ground.

2.13 The turbines will be decommissioned in a similar manner to that of their construction and then recycled, if practicable. Turbine foundations will be broken up to below ground level. Typically this will involve the removal of the upstanding plinth to the top surface of the main foundation base.

2.14 Demolition of the control building will involve removal of the equipment, followed by demolition and removal of the building. Access tracks will be reinstated in accordance with best practice at the time of decommissioning.

2.15 Alternatively, a further Planning Application could be made at this time to extend the duration of the proposed Wind Farm or to replace the turbines with a new turbine model to take advantage of changes in technology. Any new Planning Application would be subject to further environmental appraisal.
3. ENERGY TARGETS AND THE NEED FOR THE DEVELOPMENT

Introduction

3.1 Recent years have seen the rapid development of strongly pro-renewables policy frameworks at EU, UK and Scottish levels. The main driver for these policy frameworks has been the need to reduce greenhouse gases and dependence on fossil fuels in order to combat climate change, and the requirement to fill the resulting energy gap with low carbon alternatives. A secondary driver within the UK has been energy security, with North Sea oil and gas production steadily in decline and concerns arising about sourcing energy from politically unstable regions. Furthermore, within Scotland many existing power stations are reaching the end of their design lives, thus raising the potential of a shortfall in indigenous electricity generating capacity.

Climate Change and Renewable Energy Targets

European Union

3.2 Based upon the Intergovernmental Panel on Climate Change (IPCC) findings, the European Commission’s analysis shows that global emissions will have to be stabilised by around 2020, then reduced by at least 50% of 1990 levels by 2050, with developed countries collectively cutting their emissions to 30% below 1990 levels by 2020 and 60-80% by 2050. The European Union has unilaterally agreed a new Climate and Energy Package which aims to deliver cuts in emissions of 20% by 2020 which will be increased to 30% cuts in the event of a global deal.

3.3 In April 2009 the European Commission adopted a new European Renewables Directive (RD) which sets the ambitious target of obtaining 20% of all the EU’s energy (not just electricity) to come from renewables sources by 2020. The RD was negotiated on this 20% target basis and resulted in country “shares” of this target. For the UK, the share is that 15% of all final energy consumption should be accounted for by energy from renewables sources. This is a considerable challenge and would represent a 30% increase from the current level of some 5.5% of all energy used in the UK coming from renewable sources.

United Kingdom

3.4 Since Scottish devolution in 1999, energy responsibilities have been divided between the UK and Scottish Governments. Energy policy and regulation remains a reserved matter and is a UK responsibility but the protection of the environment, planning powers and the promotion of energy efficiency are devolved Scottish responsibilities.

3.5 Encouraging more electricity generation from renewable sources is an important element of both the UK and Scottish Climate Change Programmes. The UK Climate Change Programme 2006 sets a target of 10% of all UK electricity being provided from renewable sources by 2010. To implement their strategies, the UK Government and Scottish Government have placed an obligation on all licensed electricity suppliers to provide an increasing proportion of their electricity from renewable sources.

3.6 The UK’s Energy White Paper 2007 states that “we are determined to become a low carbon economy” (DTI, 2007) and reaffirms the UK Government’s four energy priorities as reducing CO₂ emissions, maintaining energy security, promoting sustainable growth and tackling fuel poverty. Turning to the first of these objectives, the UK Government has set a goal of reducing CO₂ emissions to 20% below 1990 levels by 2010 and in 2006 launched the UK Climate Change Programme.
3.7 The Climate Change Act 2008 established a system of 5 year carbon budgets to manage the trajectory of UK emissions to a target of 80% cuts by 2050. It also allowed for the establishment of the Committee on Climate Change to provide advice to the UK Government and devolved administrations on the setting of carbon budgets and other climate change issues.

3.8 In December 2008, the Committee on Climate Change proposed a set of ‘interim’ carbon budgets covering the five year periods 2008-12, 2013-17, and 2018-22. These budgets would see the UK’s greenhouse gas emissions in 2020 fall to at least 34% below their 1990 level. The Committee also proposed stretching ‘intended’ budgets which would see emissions reduce by 42% by 2020. In April 2009 the UK Government announced that it would set its carbon budgets based on the Committee’s interim budgets.

3.9 The UK Renewable Energy Strategy (UKRES) was issued by the Department of Energy and Climate Change (DECC) in July 2009. The UKRES sets out what needs to happen and when for the UK to meet the EU’s legally binding target that 15% of all energy is to come from renewables sources by 2020. The UKRES also presents a lead scenario that involves more than 30% of electricity to be generated from renewables (compared to around 5.5% today), with onshore wind to play a major role in achieving this target.

3.10 The Renewables Obligation (RO) was introduced into the UK in April 2002 and is the principal mechanism by which the UK aims to reach its targets for renewable energy. The RO requires licensed electricity suppliers to source a specific and annually increasing percentage of the electricity they supply from renewable sources. The percentage target began at 3% in 2003 and is set to rise progressively to 15.4% by 2015. Under the scheme, one Renewables Obligation Certificate (ROC) is issued for each megawatt hour (MWh) of eligible renewable output generated. The ROCs can be used by suppliers to demonstrate compliance with the RO and can also be sold (traded) to suppliers so that they may fulfil their obligation. In 2009, power generation from renewable sources eligible under the Renewables Obligation stood at 4.9% (BERR, 2008), indicating that further significant development in renewable energy sources is needed to meet this target.

Scottish Climate Change and Renewable Energy Targets

The Climate Change (Scotland) Bill

3.11 The Scottish Government began consultation on a Climate Change Bill in 2008. In August 2009, the Climate Change (Scotland) Bill received Royal Assent. The Act requires Scotland’s greenhouse gas emissions to be at least 80% lower in 2050 compared with 1990 levels (known as the “2050 target”). An interim target also requires emissions to be at least 42% lower by 2020 compared with 1990 levels. The Act also requires the Scottish Government to act:

- to reduce greenhouse gas emissions year on year, every year from 2011 to 2050;
- to increase the rate of reduction from 2020 onwards to at least 3% per year; and
- to specify more detailed annual targets in 2010, for each year to 2022.

3.12 Under the terms of the Act, Ministers were allowed to vary by order the interim target of a 42% reduction in emissions based on expert advice from the Committee on Climate Change. The Committee on Climate Change has confirmed that the 42% target represents an appropriate contribution to global emissions reductions in 2020 and would put Scotland on the path to meeting the target of an 80% reduction by 2050. On that basis, Scottish Ministers will retain the ambitious 42% target.
3.13 The Climate Change Delivery Plan (2009)

The Scottish Government issued the Climate Change Delivery Plan, entitled ‘Meeting Scotland’s Statutory Climate Change Targets’ in June 2009. The Plan sets out the high level measures required in each sector to meet Scotland’s statutory climate change targets to 2020 as set in the Climate Change (Scotland) Act 2009 and the work to be done over the next decade to prepare for the more radical changes needed by 2030 if the 80% emission reduction target is to be achieved.

3.14 For the electricity sector, targets have been set for the percentage of electricity demand which should be met from renewable energy sources by 2020. The current target is for 50% of Scotland’s electricity to be generated from renewable sources by 2020. This 50% target (which is not a cap) translates into a requirement for some 8.4 GW of installed renewable energy capacity compared with the 2008 capacity of 2.8 GW.

3.15 Paragraph 3.20 of the Plan notes that the requirement on the UK to meet EU renewable targets by 2020, equating to 15% of all energy use from renewable sources, will lead to strong demand from elsewhere in the UK for Scottish renewable electricity.

3.16 The Scottish Renewables Action Plan (2009)

The Scottish Government issued the Renewables Action Plan (RAP) in June 2009. The RAP identifies what needs to happen in the renewables sector and by when in order to meet the Scottish Government’s renewable energy targets, with a particular focus on actions needed over the immediate 24 month period.

3.17 The RAP identifies collective actions by government, its agencies and partners, to ensure that 20% of Scotland’s energy use comes from renewable sources by 2020. Key renewables objectives as set out in the RAP include:

- to maximise the economic, social and environmental potential of Scotland’s renewable resource, across different technologies;
- to establish Scotland as a UK and EU leader in the field;
- to ensure maximum returns for the Scottish domestic economy; and
- to meet targets for energy from renewables, and for emissions reductions, to 2020 and beyond.

3.18 The RAP refers to Scottish and UK structures and makes it clear that the Scottish Government is continuing to engage very closely with the UK Government on the shape and scope of renewable energy legislation and the financial incentives that they create. There is reference to the Renewables Obligation (RO) mechanisms and the RAP states that Scottish Government is working with “UK colleagues on the further changes to the RO required to align it with the demands of the EU 20% target.”

3.19 Section 4 of the RAP highlights that each of the technology sectors will have its own part to play in helping Scotland meet its energy targets “and ministers are committed to a diverse renewables mix to maximise the scope to match supply with demand and to enhance security of supply.”

3.20 In terms of energy consents and planning, this matter is addressed in Section 8. Actions include the need to:

- create a supportive planning landscape;
- ensure the planning and consenting regimes better support investment in renewables in Scotland; and
- continue to work with Local Planning Authorities to develop their strategic locational guidance in line with Planning Advice Note (PAN) 45 and to ensure that the planning system produces decisions that are efficient, transparent, consistent and timely.
3.21 Each renewable technology is referred to in the Annex of the RAP. With regard to onshore wind, the vision is expressed as “continued expansion of portfolio of onshore wind farms to help meet renewables targets, with robust planning frameworks supporting timely processing of consents applications and ensuring wind farms are consented where they are environmentally acceptable.” The headline ambitions are expressed as:

- supporting the development of onshore wind farms in locations where it is environmentally acceptable, and hence contributes most effectively to sustainable economic growth; and
- maximising community engagement with onshore wind projects and providing support for small and community-scale developments.

3.22 Although seeking to use a range of renewable technologies, the RAP recognises that given the proven status of the technology, onshore wind is expected to provide the majority of capacity in the timeframe for the Scottish Government’s interim and 2020 renewable electricity targets.

The Contribution of the Proposed Wind Farm

3.23 With onshore wind offering the most efficient and competitive renewable technology in the short to medium term, these ambitious policy targets for reducing greenhouse gas emissions and the percentage of energy to be generated from renewable sources provide a strong justification for continuing to increase windfarm capacity within Scotland. It is therefore considered that the proposed Wind Farm is consistent with the UK and Scottish Government’s energy policy and will make a positive and valuable contribution towards achieving these objectives.
4. DEVELOPMENT PLAN AND NATIONAL POLICY

Introduction

4.1 Sections 25 and 37 (2) of The Town & Country Planning (Scotland) Act 1997 as amended by The Planning etc. (Scotland) Act 2006 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement has been prepared to take account of this requirement.

4.2 The Development Plan for the site of the proposed Wind Farm comprises the Highland Structure Plan 2001 (hereafter referred to as the ‘Structure Plan’) and the Ross and Cromarty East Local Plan 2007 (hereafter referred to as the ‘Local Plan’).

4.3 The Structure Plan sets out policies in relation to renewable energy and wind farm developments. The Local Plan does not include any renewable energy or wind farm policies. It is noted that the Structure Plan and Local Plan pre-dates Scottish Planning Policy 6 (SPP 6): Renewable Energy (2007) and its replacement Scottish Planning Policy (SPP) (2009). SPP provides the most recent expression of Scottish Government planning policy on renewable energy. Thus SPP is a key material consideration in this instance and consequently is examined in advance of the Development Plan.

Scottish Planning Policy

4.4 SPP was published in February 2010 and replaces all the previous topic based SPPs (which are now revoked) into a single consolidated document. The SPP does not represent any review or change of policy, but presents policy in a shorter, clearer and more focused form.

4.5 The SPP subject policies on renewable energy (paragraphs 182 to 199) set out how the planning system should manage the process of encouraging, approving and implementing renewable energy proposals when preparing development plans and determining planning applications.

4.6 Paragraph 182 outlines the Scottish Ministers’ commitment to increasing the amount of electricity generated from renewable sources in response to climate change and the need to ensure and diversify energy supplies. It identifies that Scottish Ministers have set a target of generating 50% of Scotland’s electricity from renewable sources by 2020 and confirms that this target should not be regarded as a cap. To meet this target, the intention of the SPP is that this renewable energy should be met by a range of renewable technologies. However, this paragraph recognises that onshore wind power is currently making the most significant contribution and that this is expected to continue.

4.7 Paragraph 187 establishes that planning authorities should support the development of wind farms in locations where the technology can operate efficiently and cumulative impacts can be satisfactorily addressed. It provides that development plans should provide a clear indication of the potential for development of wind farm of all scales, and should set out the criteria that will be considered in deciding applications for all wind farm developments. It states that the criteria will vary depending on the scale of the development and its relationship to the characters of the surrounding area, but are likely to include:

- landscape and visual impact;
- effects on the natural heritage and historic environment;
- contribution of the development to renewable energy generation targets;
- effect on the local and national economy and tourism and recreation interests;
- benefits and disbenefits for communities;
- aviation and telecommunications;
4.8 Responding to the criteria above it is considered that:

**Landscape and Visual Impact**

4.9 The proposed Wind Farm has been assessed in terms of landscape and visual impact in Chapter 5 – Landscape and Visual Assessment of the ES and in Table 4.1 below. An additional assessment of sequential effects on users of the A835(T) in the form of a series of wirelines at Black Bridge was also undertaken.

<table>
<thead>
<tr>
<th>TABLE 4.1 ASSESSMENT OF PROPOSED WIND FARM ON LANDSCAPE DESIGNATIONS</th>
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<tbody>
<tr>
<td><strong>Resource</strong></td>
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<tr>
<td><strong>Landscape</strong></td>
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<tr>
<td>Regional Scenic Area (RSA)</td>
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<tr>
<td>Area of Great Landscape Value (AGLV)</td>
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<tr>
<td>Search Areas for Wild Land (SAWL)</td>
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<td>Sensitive Landscape Areas (SLA)</td>
</tr>
</tbody>
</table>

4.10 There are no national or regional landscape designations on the site of the proposed Wind Farm and thus its operation would not generate any direct landscape effects. Landscape effects would therefore be limited to indirect effects, such as those on the views and visual character experienced from within designated landscapes as a consequence of the presence of the operation of the proposed Wind Farm.
4.11 The Ben Wyglis proposed AGLV is located approximately 7km to the east of the application site and the Freevattar/Ben Dearg/The Fannichs proposed AGLV lies approximately 6km to the north and west of the application site. These designated landscapes provide a sense of remoteness and wilderness. This perception may be impacted by the proposed Wind Farm, albeit that there are already a number of man-made features within these landscapes, including forestry and hydro-electric development. These have all become significant features within the landscape, without significantly impacting upon the key characteristics and qualities of the landscape resource. It is considered that this is likely to be the case should the proposed Wind Farm be constructed. Overall, it is therefore considered that the impacts of the proposed Wind Farm on the AGLV’s are acceptable.

4.12 The site of the proposed Wind Farm lies within a landscape defined as of ‘rounded hills’ character and adjacent to the ‘undulating moorlands’ and ‘rocky moorlands’ landscape. The key characteristics of the rounded hills landscape character area are the wide open concave and convex slopes with simple lines that sweep down into broad open straths. This landscape type is vast in scale.

4.13 The landscape and visual assessment establishes that the proposed Wind Farm will have a localised significant effect on the rounded hills and undulating moorlands landscape character areas when the proposed Wind Farm is operational as the turbines and associated infrastructure are not characteristic of the existing landscape. However, given the extent of these landscape character types with this part of Ross and Cromarty, the proposed Wind Farm is unlikely to have a significant impact on these landscape character areas as a whole.

4.14 Consultation with SNH and the Highland Council in August 2010 identified the need to provide further explanation and justification for the wind farm design and the turbine layout. Viewpoint 3 at Black Bridge was highlighted as a key receptor to use to illustrate this point. The viewpoint is at a layby beside the A835 and is also representative of views gained by occupiers of vehicles using this tourist route. A series of 6 wireline images were produced ad distances of 100 to 200m apart to illustrate the changing view of the wind farm when travelling west on the road. The images show that the sequence of views illustrates how the proposed Wind Farm is gradually revealed, but always partially concealed in the landscape. The proposed Corriemoillie Wind Farm would become another landscape feature which is gradually revealed within a journey. The final detailed design has sought to achieve a compact and visually cohesive group of turbines, with a reasonably regular rhythm within the group, and visual continuity with the Lochluichart Wind Farm.

4.15 The effects on visual amenity relate to changes to available views rather than perceived changes to whole areas of a distinctive landscape character. Chapter 5 – Landscape and Visual Assessment of the ES provides an assessment of the key views and representative views in this case. The assessment concludes that changes to views are likely to be most significant in the immediate surrounding hills and mountains, including Ben Wyvis. However, it should be noted that the significance of these views on visual receptors within a close range of the proposed Wind Farm has been minimised as far as possible through the layout and design of the process and must also be considered in the context of the consented Lochluichart Wind Farm. Overall it is therefore considered that the visual impact of the proposed Wind Farm is not significantly adverse to justify the withholding of planning permission.

Natural Heritage

4.16 The proposed Wind Farm has been assessed in terms of natural heritage in Chapter 6 – Ecology and Chapter 7 – Ornithology of the ES and in Table 4.2 below.

<table>
<thead>
<tr>
<th>Resource</th>
<th>Consideration</th>
<th>Predicted Effects</th>
<th>ES Chapter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ecological Resources</td>
<td>Special Areas of Conservation (SACs)</td>
<td>Fannich Hills SAC is located approximately 6km west of the application site. The proposed Wind Farm will not have a significant impact on this designation.</td>
<td>Chapter 6</td>
</tr>
<tr>
<td>Resource</td>
<td>Consideration</td>
<td>Predicted Effects</td>
<td>ES Chapter</td>
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<tr>
<td>Beinn Dearg SAC</td>
<td>is located approximately 7km north of the application site. The proposed Wind Farm will not have a significant impact on this designation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ben Wyvis SAC</td>
<td>is located approximately 8km east of the application site. The proposed Wind Farm will not have a significant impact on this designation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Protection Areas (SPAs)</td>
<td>Glen Affric to Strathconon proposed SPA is located approximately 4km to the south of the application site. The proposed Wind Farm will not have a significant impact on the species and integrity of this proposed SPA.</td>
<td></td>
<td>Chapter 7</td>
</tr>
<tr>
<td></td>
<td>Achanalt SPA is located approximately 7.7 to the west of the application site. The proposed Wind Farm will not have a significant impact on the species and integrity of this SPA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ben Dearg SPA is located approximately 7km to the north of the application site. The proposed Wind Farm will not have a significant impact on the species and integrity of this SPA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ben Wyvis SPA is located approximately 8km east of the application site. The proposed Wind Farm will not have a significant impact on the species and integrity of this SPA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cromarty Firth SPA is located approximately 21km to the south east of the application site. The proposed Wind Farm would not have a significant adverse impact on the species and integrity of this designation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramsar</td>
<td>The Cromarty Firth Ramsar site is located approximately 21km to the south east of the application site. The proposed Wind Farm would not have a significant adverse impact on the species and integrity of this designation.</td>
<td></td>
<td>Chapter 7</td>
</tr>
<tr>
<td>Sites of Special Scientific Interest (SSSI)</td>
<td>There are no SSSIs located within the site boundary. There are 5 ecological SSSI within 10km of the application site. By virtue of their distance from the site, the ES establishes that there will be no significant adverse impacts on these SSSI as a consequence of the proposed Wind Farm.</td>
<td></td>
<td>Chapters 6/7</td>
</tr>
<tr>
<td>European Protected Species (EPS)</td>
<td>The proposed Wind Farm will not have a significant adverse impact upon any EPS.</td>
<td></td>
<td>Chapters 6/7</td>
</tr>
<tr>
<td>Nationally Protected Species (NPS)</td>
<td>The proposed Wind Farm will not have a significant adverse impact upon any NPS after mitigation.</td>
<td></td>
<td>Chapter 6/7</td>
</tr>
<tr>
<td>Species and habitats recognised in Local Biodiversity Action Plans</td>
<td>The site of the proposed Wind Farm contains several UK and Local BAP species and habitats. The ES establishes that the proposed Wind Farm would not have a significant impact upon these species and habitats after mitigation.</td>
<td></td>
<td>Chapter 6</td>
</tr>
<tr>
<td>Local Nature Conservation Sites</td>
<td>N/A</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td>Ancient Woodland</td>
<td>N/A</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

4.17 There are no international or national nature conservation designations on the site of the proposed Wind Farm. By virtue of either the designated features or the distance separating the proposed Wind Farm from them, the three SACs and five SSSIs within 10km of the site would not be affected by the proposed Wind Farm.

4.18 In relation to the SPAs within 10km of the application site, none of the qualifying species for Achanalt SPA, Beinn Dearg SPA or Ben Wyvis SPA were identified during any of the ornithology surveys undertaken. It is therefore concluded that the proposed Wind Farm will have no impact on the integrity of these SPAs' from an ornithological perspective.

4.19 With regard to the Cromarty Firth SPA, which is located approximately 21km to the south east of the application site, the ES identified that the proposed Wind Farm site and adjacent area is of
marginal use for greylag geese during the migratory period but is not used at all for daily foraging or roosting activities. It is therefore concluded that the proposed Wind Farm will have no significant impact on the integrity of the Cromarty Firth SPA goose population.

4.20 An assessment of impact on the Glen Affric to Starthconon pSPA indicated that the main body of the site is over 6km from the range centre of the closest pair of eagles, and it is considered to be inappropriate territory for eagles. No golden eagles were observed to fly within the site boundary. It is therefore considered that the proposal will not affect the integrity of the site and there would be no significant adverse impact on birds from the pSPA.

4.21 An extended Phase 1 Habitat Assessment and protected species surveys were undertaken to establish if the site of the proposed wind Farm has any value for protected species or ecological habitats. This information about valued ecological features was fed into the wind farm design in order to minimise the potential for negative impacts occurring.

4.22 With regards to European Protected Species, the ES identifies that:

- The application site and surrounding area is not well used by bats, nor were any bat roosts identified within the application site or within 1km of the proposed turbine locations. It is therefore concluded that bats are unlikely to be adversely affected by the proposed Wind Farm.

- Although otter may use the area sporadically, no resting sites or couches were recorded. It is therefore concluded that otters are unlikely to be adversely affected by the proposed Wind Farm.

- There is no record of the presence of wildcat or pine martin on the application site and therefore these species will not be adversely affected by the proposed Wind Farm.

4.23 With regards to Nationally Protected Species, the ES identifies that:

- Although there is evidence of water vole activity on the application site, the locations of water vole signs are away from the proposed turbine locations and therefore the proposed Wind Farm is unlikely to have an adverse impact on this species.

- No red squirrels were observed within the site boundary so there will be no adverse impact on this species.

- There is no recent evidence of badger activity or resting places on the application site and therefore the proposed Wind Farm is unlikely to have an adverse impact on this species.

- Suitable habitats for reptiles and amphibians are present onsite. The potential adverse impacts on these habitats and species as a result of the proposed Wind Farm would be mitigated for through adoption of best practice methods and protection of water courses during construction.

4.24 The site of the proposed Wind Farm contains several priority habitats, including three Annex 1 habitats protected under the EU Habitats Directive, namely dry heathland/acid grassland, wet heath/acid grassland and blanket bog. However, given the footprint of the proposed Wind Farm will result in the loss of less than 4ha of habitat (excluding the coniferous plantation which will be predominantly clear felled) and that the proposal will enable habitat restoration on the site, this effect is not considered to be significant. It is therefore considered that the overall habitat impacts of the proposed Wind Farm are acceptable.

4.25 An ornithological assessment was also undertaken to establish if the proposed Wind Farm would have the potential to impact upon valued ornithological receptors through direct collision, disturbance or displacement. The assessment concluded that, providing best practice is followed to avoid disturbance to breeding birds (including exclusion zones and avoiding damage or
destruction to occupied nests), the proposed Wind Farm will not have a significant impact upon any valued ornithological receptors.

4.26 In view of the above, it is therefore considered that the impacts of the proposed Wind Farm on species and habitats will not be significantly detrimental.

**Historic Environment**

4.27 The proposed Wind Farm has been assessed in terms of the historic environment in Chapter 10 – Cultural Heritage of the ES and in Table 4.3 below.

<table>
<thead>
<tr>
<th>Resource</th>
<th>Consideration</th>
<th>Predicted Effects</th>
<th>ES Chapter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural Heritage</td>
<td>Scheduled Ancient Monuments (SAMs) and their settings</td>
<td>There are no SAMs within the application site. The nearest SAM, Little Garve Bridge over River Black Water lies within 1.5km of the proposed Wind Farm. The proposed Wind Farm would have no significant adverse impact on this SAM. The proposed Wind Farm would not have a significant adverse effect on any other SAMs or their setting outwith the immediate vicinity.</td>
<td>Chapter 10</td>
</tr>
<tr>
<td>Listed Buildings and their settings</td>
<td></td>
<td>There are no listed buildings within the application site or within the immediate vicinity of the site of the proposed Wind Farm. Beyond the immediate vicinity, the proposed Wind Farm would have no significant direct or indirect impacts on any listed buildings or their setting.</td>
<td>Chapter 10</td>
</tr>
<tr>
<td>Conservation Areas and their settings</td>
<td></td>
<td>There are no Conservation Areas within 10km of the proposed Wind Farm. Beyond this the proposed Wind Farm would have no significant direct or indirect impacts on any Conservation Areas or their setting.</td>
<td>Chapter 10</td>
</tr>
<tr>
<td>Historic Gardens and Designed Landscapes</td>
<td></td>
<td>There are no registered Gardens and Designed Landscapes within 10km of the boundary of the proposed Wind Farm. There are two registered Gardens and Designed Landscapes between 10km and 15km of proposed Wind Farm. However the proposed Wind Farm would have no direct or indirect impacts on these designated areas.</td>
<td>Chapter 10</td>
</tr>
<tr>
<td>Archaeological remains</td>
<td></td>
<td>The archaeology remains within the site of the proposed Wind Farm primarily relate to examples of farmsteads, mining infrastructure and pastoral farming and are assessed as being of no more than local importance at best.</td>
<td>Chapter 10</td>
</tr>
</tbody>
</table>

4.28 There are no listed buildings, Conservation Areas, Scheduled Ancient Monuments (SAM) or sites recorded on the Register of Gardens and Designed Landscapes within the site of the proposed Wind Farm.

4.29 One known archaeological feature of local importance is present on the site but the cultural heritage assessment concludes that the proposed Wind Farm would not have a significant impact upon this feature. There would be no direct or indirect impact on any other site within the application area.

4.30 There is one Scheduled Ancient Monument, Little Garve Bridge (SAM2720) within 1.5 kilometres of the boundary of the proposed Wind Farm. There would be no visibility of the proposed Wind Farm from this Scheduled Ancient Monument and the proposed Wind Farm would have no physical impact upon this feature. There are no Conservation Areas, listed buildings or designed landscapes within the vicinity likely to be affected.

4.31 Overall it is established that there will be no significant adverse impact on cultural heritage as a result of the proposed Wind Farm.

**Contribution to Renewable Energy Generation Targets**

4.32 As set out in Chapter 3 of this Planning Statement, the proposed Wind Farm will make a positive and valuable contribution towards meeting the UK and Scottish Government’s renewable energy targets.
4.33 The wind resource at this site is above the Scottish average, and will be reflected in the proposed Wind Farm’s electricity output of approximately 133.15GWh per annum (on the basis of a 30% output). The efficiency of the location and the scale of output are considered to be an important material consideration in favour of the proposed Wind Farm.

**Impact on the Economy, Tourism and Recreation**

4.34 The impact of the proposed Wind Farm on the local economy, tourism and recreation is addressed in Chapter 5 – Landscape and Visual Assessment and Chapter 13 - Socio-Economics, Tourism and Land Use of the ES. The impact of the proposed Wind Farm on tourism would mainly be related to its effect on the landscape.

4.35 It is recognised that Wester Ross is an important tourism area in the Highlands. However, the area in which the site of the proposed Wind Farm is located is considered as being transitional whereby most people pass the site rather than it being a destination in itself. There are two key tourist routes in the vicinity of the site. To the north is the A385 Inverness to Ullapool road and to the south the A832. Although the proposed Wind Farm would be visible when travelling on both these routes, it is not considered that it would significantly adversely affect the visitor’s experience.

4.36 In terms of recreational interest, there are no promoted long distance walking or cycling routes in the vicinity of the proposed Wind Farm, with the nearest route, National Cycle Route 1, approximately 10km to the east of the proposed Wind Farm at its nearest point and therefore unlikely to be significantly affected.

4.37 The summit of Ben Wyvis, which is considered the most popular hill walking area in the vicinity of the proposed Wind Farm, is situated approximately 11km to the east of the application site. Chapter 5 – Landscape and Visual Assessment of the ES predicts that the effect of the proposed Wind Farm on the view from the summit of Ben Wyvis as being of moderate significance, and more distant peaks as of equal or lower significance.

4.38 At a local level, the site itself is not currently well used for recreation nor are there any Rights of Way or any Core Paths as identified on the draft Core Path plan within the application site. Chapter 5 – Landscape and Visual Assessment of the ES identifies that there are 28 Rights of Way and other recognised footpaths, based upon bare ground terrain, that fall within the theoretical visual extent of the proposed Wind Farm. The predicted visibility impacts of the proposed Wind Farm on these Rights of Way and footpaths are detailed in Table 5.7 of the ES. Overall, the assessment concludes that significance on the Rights of Way and other pathways has been assessed as between substantial to moderate and not significant, with 14 of the 28 paths assessed as having no significant effects.

4.39 However, it should be noted that the assessments contained within Chapter 5 – Landscape and Visual Assessment of the ES do not put any weight on the opinion of the viewer. It should be considered that the acceptability or otherwise of the visual impact of wind farms is a largely subjective matter and there is no evidence that wind farms have a negative impact upon tourism or recreation interests. For most tourists, wind farms are not a major factor in their decision making, while amongst those who do take note of them, most regard them as having either a positive or a neutral effect on the landscape (Scottish Government, 2008). Far more visitors appear to associate wind farms with clean energy rather than with landscape damage (NFO System Three, 2002). The presence of the consented Lochluichart Wind Farm should also be taken into account when considering the acceptability of the impact of the proposed Wind Farm on the viewers’ experience.

4.40 Furthermore, it should be recognised that although the view may be regarded by some walkers as the primary reason for hill walking, the journey and experiences other than the view (such as exercise, shared experience with family/friends and physical challenges gained from the activity) are likely to play an important role in others’ enjoyment of the activity. These will not be affected by the presence of the proposed Wind Farm.
4.41 For these reasons given above, it is therefore considered that overall the proposed Wind Farm will not have an unacceptable impact upon tourism and recreation interests.

4.42 For the economy, the design, development, construction, maintenance and decommissioning of the proposed Wind Farm will generate additional employment and safeguard existing jobs in those companies directly involved in the scheme. It is estimated that 60 workers would be employed during the construction period. E.ON will encourage the use of local contractors where possible to ensure maximum positive benefits to the local communities.

4.43 Indirectly the proposed Wind Farm will also create further employment opportunities down the supply chain for those companies providing services to the proposed Wind Farm, for example engineering services, plant and equipment supply and haulage. A further economic benefit will also arise to local accommodation providers.

4.44 The proposed Wind Farm would result in the removal of a large area of coniferous forestry of relatively recent origin. However, the extent of commercial forestry locally is such that the loss of this area of forestry would not be significant. Furthermore, it is considered given the existing drainage and topography of the forest, it is unlikely to be economically viable for production. It is also worth noting that the removal of the area of forestry will also present opportunities for conservation and landscape improvements that will provide local and regional benefits.

Benefits and Disbenefits for Communities

4.45 SPP defines “communities” as comprising cities, towns and villages and indicates that up to 2km is an appropriate separation distance from turbines to the edge of communities. The 2km separation distance is intended to recognise that visual impacts are likely to be a prominent feature within this distance.

4.46 There are no communities as defined within SPP within 2km of the proposed Wind Farm. The nearest communities are Garve, located approximately 7km from the nearest turbine, and Achnasheen, located approximately 12km from the nearest turbine.

Aviation

4.47 The potential impacts of the proposed Wind Farm on the flight paths of aircraft and airport radar and communication systems are considered in Chapter 14 – Other Considerations of the ES.

4.48 The location and operation of wind turbines have the potential to interfere with radar. Potential effects include masking, radar clutter or interference, and scattering, which occurs when the rotating turbine blades reflect or refract radar waves in the atmosphere. If the turbines are visible by the radar, they can generate clutter which masks the existence of aircraft. These effects on radar can have an adverse effect on aircraft safety. Due to their height, wind turbines may also present a collision risk to low flying aircraft, such as those taking part in military training exercises.

4.49 It is not anticipated that the proposed Wind Farm will affect military air traffic movements. However following pre-application consultation the Defence Estates have requested that some of the turbines are fitted with lights. RenewableUK (formerly The British Wind Energy Association) is currently in dialogue with the Defence Estates on the need for such lighting on wind turbines. These discussions indicate that any lighting is likely to be for 25 candella lights placed on certain turbines at hub height.

Telecommunications

4.50 The potential impacts of the proposed Wind Farm on television, radio, microwave fixed links and other broadcasting installations are considered in Chapter 14 – Other Considerations of the ES.

4.51 Wind turbines can adversely affect domestic television reception either by reflecting away some of the transmitted signal or by introducing multi-path interference. Multi-path interference to
television signals can cause “ghosting” where an object in the picture appears several times in slightly different positions. Digital TV signals are not generally affected by wind turbines, however a minimum signal strength is required for digital television to operate effectively.

4.52 The proposed Wind Farm has been assessed in accordance with the BBC Wind Farm Tool. The results of the assessment predict that there are no homes where TV reception could be affected, and that no transmitters would be affected.

4.53 Microwave fixed links require a clear line of sight between the transmitting and receiving dish and hence wind turbines placed too close to the path of the link may cause interference.

4.54 Consultation with microwave fixed linked operators has indicated that the proposed Wind Farm would not interfere with the operation of these facilities, with the possible exception of O2. A detailed technical study on the potential effect of the turbines on the O2 microwave radio link between the A832 and A835 will therefore be carried out. This report will be discussed with O2, and any required mitigation measures will be implemented by E.ON.

4.55 In view of the above it is considered that the proposed Wind Farm will have no impact upon television and radio broadcasting and that through further discussion and potential micrositing, the effect of the proposed Wind Farm on microwave fixed links will not be significant.

Noise

4.56 The proposed Wind Farm has been assessed in terms of noise in Chapter 11 – Noise and Vibration of the ES.

4.57 Noise during the construction of the proposed Wind Farm will derive mainly from physical impact and traffic movements. Traffic movements will include vehicles bringing concrete for foundations, HGV’s bringing components, vehicles transporting those working on site and vehicles bringing a crane to erect the turbines. Noise from these sources will be generally low and will not result in any unacceptable disturbance to any residential properties or other sensitive receptors.

4.58 Once operational, the main source of noise will be the aerodynamic noise produced by the passage of the blades through the air. However, this noise will be generally unobtrusive given it will be broadband in nature - similar to, for example, the noise of wind in trees. The mechanical noise produced by the gearbox, generator and other parts of the drive train of the proposed turbines will be almost undetectable due to recent improvements in turbine technology.

4.59 A noise prediction assessment was carried out at six nearby noise sensitive properties at Forest Hill, Corriemoillie Farm, Lochluichart Lodge, Corriemoillie Lodge, Glenview and the Aultguish Inn. It was concluded that predicted levels, based on the measured sound power level of a Siemens SWT-2.3-93 wind turbine (hub height of 80m), would be well below the lower absolute noise criteria contained within the ETSU-R-97 – Recommended Good Practice on Controlling Noise from Wind Farms (DTI, 1997) guidance. Appropriate conditions can be imposed to ensure compliance within these limits.

Shadow Flicker

4.60 The potential impacts of the proposed Wind Farm on residential properties as a result of shadow flicker are considered in Chapter 14 – Other Considerations of the ES.

4.61 Shadow flicker is a phenomenon which can be a symptom of wind turbines. It is a stroboscopic effect caused by the rotation of turbine blades casting a shadow within nearby residential property where the shadow is cast into a room through a narrow window or aperture.

4.62 The likelihood and duration of the effect depends upon:
- the direction of the property relative to the turbines: in the UK, only properties within 130° either side of north, relative to the turbines, can be affected, as turbines do not cast long shadows on their southern side;
- the distance from turbines: the further that dwellings are from the turbine, the less pronounced the effect would be. Shadow flicker effects have been proven to be potentially significant only at distances within 10 rotor diameters of a turbine;
- turbine height and rotor diameter;
- time of year and day; and
- weather conditions.

4.63 Since there are no residential properties within a distance of 900m to the nearest turbine and 130° either side north or south of the proposed turbine locations, no shadow flicker effects are predicted to occur. Furthermore, as the nearest sensitive receptor is over 2km from the nearest turbine, an increased turbine blade length would not alter this conclusion.

**Cumulative Assessment**

4.64 The cumulative impact of the proposed Wind Farm has been assessed against landscape and visual, ecology, ornithology, hydrology, hydrogeology and geology, cultural heritage, noise and vibration and traffic and transport within the ES.

4.65 Paragraph 188 of the SPP clarifies that when considering cumulative impacts, planning authorities should take account of existing wind farms, those which have permission and valid applications for wind farms which have not been determined. The weight that planning authorities attach to undetermined applications should reflect their position in the application process.

4.66 With regards to cumulative impacts, the key issue in the case of the proposed Wind Farm relates to the inter relationship between different wind farms in the area on the landscape. Chapter 5 – Landscape and Visual Assessment of the ES considers the potential cumulative effects on landscape character and visual amenity. Wind farms considered in the cumulative assessment are listed in Table 5.8 of the ES.

4.67 The assessment predicts that the addition of the proposed Wind Farm would give rise to significant impacts to limited parts of the rounded hills, undulating moorland and rocky moorland landscape character areas up to around 6km from the proposed turbines. However, given the extent of these landscape character types within this part of Ross and Cromarty, the proposed Wind Farm is unlikely to have a significant impact on these landscape character areas as a whole.

4.68 With regard to cumulative visual impact, the assessment predicts that there are a series of hilltop locations within 35km from which one or more wind farms could potentially be visible in addition to the proposed Wind Farm. These include Lochluichart Wind Farm, Ben Tharsuin Wind Farm (and extension), Novar Win Farm and Fairburn Wind Farm. Overall it is considered that there are relatively few areas in the vicinity of the proposed Wind Farm from which more than two wind farms would be visible within the same view.

4.69 When considering the acceptability of the cumulative visual impacts of the proposed Wind Farm, it is considered that the impact of two wind farms located adjacent to one another in a panoramic view should be considered as a lesser impact than two wind farms in two different areas. The guidance in PAN 45 should also be noted, which states that wind farms between 15 and 30km away will only be seen in very clear visibility as a minor element within the landscape. Furthermore, it should also be noted that the level of visibility may be significantly reduced by forestry operations in the surrounding area.

4.70 Overall, it is therefore considered that on balance the cumulative landscape and visual impacts of the proposed Wind Farm are not significantly adverse to justify the withholding of planning permission.
The Development Plan

4.71 The following strategic policies and schedules specifically relate to the proposed Wind Farm in the Structure Plan:

- Policy G1 – Conformity with Strategy;
- Policy G2 – Design for sustainability;
- Policy G3 – Impact Assessments;
- Policy G4 – Community Benefit and Commitment;
- Policy G6 – Conservation and Promotion of the Highland Heritage;
- Policy E1 – Distributed Renewable Energy Developments;
- Policy E2 – Wind Energy Development;
- Policy E3 – Wind Farm Safeguarding;
- Policy N1 – Nature Conservation;
- Policy N4 – Local Biodiversity Action Plans;
- Policy L4 – Landscape Character;
- Policy T6 – Scenic Views;
- Policy BC1 – Preservation of Archaeological Sites;
- Policy BC3 – Archaeological Heritage Areas;
- Policy BC4 – Historic Gardens and Designed Landscapes; and
- Policy BC5 – Listed Buildings and Conservation Areas.

4.72 The following policies and proposals specifically relate to the proposed Wind Farm in the Local Plan:

- GSP3 – Surface Water Drainage;
- GSP4 – Flood Risk; and
- GSP 16 – Transport.

The Highland Structure Plan 2001

4.73 The Structure Plan was approved by the Scottish Ministers in March 2001 and is intended to provide a strategy to guide the location of development in the Highlands until 2021. The Structure Plan sets out objectives relating to economic development, urban and rural regeneration and enhancing the environment.

Strategic Vision

4.74 The Structure Plan identifies seven strategic themes that address the issues facing the Highlands over the next 20 years. These are:

- conserving and promoting Highland identity;
- adopting a proactive approach to the wise use of the natural environment;
- taking an integrated approach to improving accessibility to goods, services and markets;
- consolidating the settlement hierarchy;
- creating an improved business environments;
- addressing the need for quality living environments; and
- working in partnership with the community and other agencies.

Sustainability

4.75 All policies in the Structure Plan are predicated on the Plan’s sustainability objectives and strategic themes which are particularly reflected in the General Strategic Policies G1-G8.

4.76 Policy G1 – Conformity with Strategy states:
“The Council will support developments, having regard to the Plan’s sustainable objectives, which promote and enhance the social, economic and environmental wellbeing of the people of Highland.”

4.77 Each of these guiding principles is enshrined within the topic specific policies of the Structure Plan and is therefore not assessed in detail here. Overall, however, it is considered that the proposed Wind Farm complies with Policy G1.

4.78 **Policy G2 – Design for Sustainability** details a number of criteria against which the proposed Wind Farm will be assessed. These include the extent to which the proposed Wind Farm:

- is compatible with service provision (water and sewerage, drainage, roads, schools, electricity);
- maximise energy efficiency in terms of location, layout and design, including the utilisation of renewable sources of energy;
- impacts on individual and community residential amenity;
- impacts on the following resources, including pollution and discharges, particularly within designated areas – habitats, species, landscape, scenery, freshwater systems and cultural heritage;
- demonstrates sensitive siting and high quality design in keeping with local character and historic and natural environment and in making use of appropriate materials; and
- contributes to the economic and social development of the community.

Developments which are judged to be significantly detrimental in terms of the above criteria shall not accord with the Structure Plan.

4.79 Non compliance with an individual criterion would not render the proposed Wind Farm contrary to this policy providing that the proposal is compatible with the policy objectives. Responding to each of the relevant criteria of Policy G2, it is considered that:

**Service Provision**

4.80 The proposed Wind Farm will be compatible with the service provision for the site.

**Energy Efficiency**

4.81 The site of the proposed Wind Farm is located in an area of high and consistent wind speeds. The layout of the proposed Wind Farm has been designed to maximise the potential energy production of the site whilst minimising any potentially detrimental environmental effects on the surrounding area. The design of the individual turbines to be used, in terms of their height and blades, is largely reflective of their functional use.

**Community and Residential Amenity**

4.82 The impact of the proposed Wind Farm on community and residential amenity has been comprehensively assessed in the ES and is also considered above in paragraphs 4.44 and 4.45 of this Planning Statement.

4.83 There are no residential properties located within the site of the proposed Wind Farm. The two closest residential properties are Corriemoillie Farm, approximately 2.3km to the south-east of the nearest turbine, and Aultguish Inn, approximately 2.3km to the north-west of the nearest turbine. The nearest communities are Garve, located approximately 7km from the nearest turbine, and Achnasheen, located approximately 12km from the nearest turbine.

4.84 Chapter 5 – Landscape and Visual of the ES provides an assessment of the impact of the introduction of the proposed Wind Farm on the visual amenity of these residential properties and communities. It concludes that changes to views are only likely to be significant for the individual properties in close proximity of the proposed Wind Farm, with the level of significance decreasing accordingly with distance. Notwithstanding this, it should be considered that the significance of
this impact on these individual properties has been reduced as far as practical through the design process for the proposed Wind Farm.

4.85 In terms of other potential adverse amenity impacts, the ES establishes that the proposed Wind Farm, following mitigation, will not unacceptably affect the amenity of nearby residential properties or communities by means of traffic, noise, shadow flicker, electromagnetic interference or other disturbance.

**Habitats and Species**

4.86 The proposed Wind Farm has been assessed in terms of habitats and species in Chapter 6 – Ecology and Chapter 7 – Ornithology of the ES and is considered above in paragraphs 4.15 to 4.25 of this Planning Statement. Overall it is concluded that the proposed Wind Farm would not result in any significant adverse impact on the habitat and species at the site or surrounding area.

**Freshwater Systems**

4.87 The proposed Wind Farm has been assessed in terms of the water environment in Chapter 9 – Hydrology of the ES. There are no designated sites that are in the immediate vicinity of the proposed Wind Farm. The watercourses draining from the site of the proposed Wind Farm are tributaries of the River Conon and the Black Water. Following the implementation of the mitigation methods identified in Chapter 9 – Hydrology of the ES it has been assessed that the proposed Wind Farm would not have a significant impact on water quality.

4.88 Given the relatively small increase in landtake as a result of the proposed Wind Farm and the limited area of impervious infrastructure being installed, the assessment establishes that the proposed Wind Farm will not have a significant effect on runoff rates. With the implementation of the proposed mitigation methods the effects on flooding are not considered to be significant.

4.89 The hydrogeology of the site is considered to be particularly sensitive given that the bedrock aquifers are dominated by fractured flow which makes them more susceptible to pollution. Therefore a comprehensive suite of mitigation methods has been incorporated into the design of the proposed Wind Farm. It is proposed that a programme of surface and groundwater monitoring will be implemented during the construction, operation and decommissioning of the site. The details of the programme will be discussed and agreed with the Scottish Environmental Protection Agency (SEPA) prior to the commencement of monitoring. Overall it is therefore considered that the risk of the development affecting groundwater resources is not significant.

**Cultural Heritage**

4.90 The proposed Wind Farm has been assessed in terms of the historic environment in Chapter 10 – Cultural Heritage of the ES and is considered above in Table 4.3 and paragraphs 4.26 to 4.30 of this Planning Statement. Overall it is concluded that the proposed Wind Farm would not on its own, or cumulatively with any other consented or proposed wind farms, have a significant adverse impact on any Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, Historic Gardens and Designed Landscapes or Areas of Archaeological Regional Importance or their setting.

**Economic and Social Development**

4.91 The impact of the proposed Wind Farm on the local economy is addressed in Chapter 13 - Socio-Economics, Tourism and Land Use of the ES and is considered above in paragraphs 4.33 to 4.43 of this Planning Statement. Overall it is concluded that the proposed Wind Farm will generate economic and social benefits for local communities in providing employment opportunities and that impacts on tourism will be minimised.

4.92 For the reasons outlined above it is therefore considered that the proposed Wind Farm complies with Policy G2.
4.93 **Policy G3 – Impact Assessments** provides that where environmental and/or socio-economic impacts are likely to be significant by virtue of nature, size or location then the appropriate impact assessments will be required from developers.

4.94 The proposed Wind Farm is accompanied by an ES in accordance with this policy.

4.95 **Policy G4 – Community Benefit and Commitment** provides that the Council will expect developments to benefit the local community and contribute to the wellbeing of the Highlands, whilst recognising wider national interests.

4.96 E.ON will establish a community fund of £2.7 million to be paid over the 25 year life span of the proposed wind farm and is therefore in accordance with this policy.

4.97 **Policy G6 – Conservation and Promotion of the Highland Heritage** states:

> “The Council will seek to conserve and promote all sites and areas of Highland identified as being of a high quality in terms of nature conservations, landscape, archaeological or built environment.”

4.98 As established in the ES, it is considered that there will be no significant adverse impact on nature conservation, archaeology or the built environment as a result of the proposed Wind Farm.

Although the proposed Wind Farm will have a localised significant effect on the rounded hills and undulating moorlands landscape character areas, the proposed Wind Farm is unlikely to have a significant impact on these landscape character areas as a whole. Likewise although part of the Ben Wyvis AGLV would be affected, the proposed Wind Farm is unlikely to impact upon the wider area of this AGLV.

**Renewable Energy**

4.99 The Structure Plan contains three renewable energy specific policies that are relevant to the proposed Wind Farm.

4.100 **Policy E1 – Distributed Renewable Energy Developments** underlines the objective of capitalising on the use of renewable and non-renewable resources and states:

> “The Council supports the utilisation of the region’s distributed renewable energy resource, including hydro, wind, wave and tidal stream power. Proposals will be assessed against the provisions of the General Strategic Policies. Approvals for renewable energy developments will normally be for a temporary period only (tied to the lifetime of a project), with provision where appropriate for the removal and reinstatement of affected areas. Earlier action for removal and reinstatement will be required in the event of premature permanent cessation of energy production.”

4.101 In accordance with Policy E1, the proposed Wind Farm has been assessed against the relevant General Strategic Policies contained within the Structure Plan.

4.102 **Policy E2 – Wind Energy Development** is the key policy which all wind energy proposals require to be assessed against. It is criteria based, though it is noted is not complete in scope (for example there are no references to birds and ecology). It states that:

> “Wind energy proposals will be supported provided that impacts are not shown to be significantly detrimental. In addition to the General Strategic Policies, wind energy proposals will be assessed in respect of the following:

- visual impact;
- noise;
- electro-magnetic interference;
- roads, bridges and traffic;
• aircraft flightpaths/MOD operations; and
• cumulative effects."

4.103 With the exception of roads, bridges and traffic, the proposed Wind Farm has already been assessed in detail in this Planning Statement against each of these criteria. It is concluded the proposed Wind Farm would have no unacceptable impacts in relation to these matters.

4.104 In respect of impacts on roads, bridges and traffic, Chapter 12 – Traffic and Transport of the ES sets out sufficient information to enable the Council to address the transport implications of the proposed Wind Farm. The assessment concludes that there will be a temporary increase in traffic levels on the A9, A835, A832, A890 and A896 during construction. Although this increase will not be significant, to minimise the traffic impact it is proposed to implement a Traffic Management Plan following consultation with the roads authority. The Plan will aim to reduce the movement of construction vehicles during the morning and evening peak traffic hours when the road network is typically at its busiest.

4.105 Traffic generated during the operation and maintenance of the proposed Wind Farm is minimal and will not result in any significant impact. Traffic during the decommissioning phase is likely to be lower than the levels associated with construction.

4.106 In view of the above, it is not considered that there will be a significant adverse impact on the existing road structures and traffic.

4.107 The other key Structure Plan policy specific to renewable energy is Policy E3 – Wind Farm Safeguarding which aims to protect approved and constructed wind farms by seeking to "safeguard the operational efficiency of approved and constructed wind farms in the consideration of adjacent proposed developments or other land use changes."

4.108 The final layout of the proposed Wind Farm has undergone a series of design iterations to take into consideration the adjacent Lochluichart Wind Farm. These design iterations aimed to ensure that the proposed Wind Farm will not adversely impact upon the operational efficiency of the Lochluichart Wind Farm. Furthermore, the design scenarios aimed to ensure that proposed Wind Farm compliments the Lochluichart Wind Farm in terms of design and layout and reduces the potential for cumulative impacts wherever possible.

4.109 It is considered that the final detailed design that is the subject of this application will achieve a compact and visually cohesive group of turbines that are in keeping with the Lochluichart Wind Farm scheme. There will be no significant adverse impacts on the operational efficiency of the Lochluichart Wind Farm as a result of the proposed Wind Farm. Instead Lochluichart Wind Farm will actually experience improved laminar wind flow due to the felling of the majority of the forest around the proposed Wind Farm.

4.110 There are also a number of general development policies within the Structure Plan that are considered relevant to the proposed Wind Farm. These policies are considered below.

**Nature Conservation**

4.111 The Structure Plan seeks to sustain and enhance the natural heritage through the protection of natural heritage designations. There are a wide variety of natural and semi natural habitats throughout the Highlands. Protecting these habitats and the wildlife which occurs within them is supported through Policies N1 and N4, which state:

4.112 **Policy N1 – Nature Conservation**

*New developments should seek to minimise their impact on the nature conservation resource and enhance it wherever possible. The Council will seek to conserve and promote all sites according to the following hierarchy:*
• sites and species of international importance – developments which would have an adverse effect on the conservation interests for which a site has been designated will only be permitted where there is no alternative solution and there are imperative reasons of over-riding public interest, including those of a social and economic nature. Where a priority habitat or species (as defined in Article 1 of the Habitats Directive) would be affected, prior consultation with the European Commission is required unless the development is necessary for public health or safety reasons;
• sites of national importance – developments will only be permitted where the objectives of designation and the overall integrity of the area will not be compromised or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance; and
• sites of local importance – developments will be assessed for their effects on the interests of sites of local conservation importance and will be resisted where these are judged to be unreasonably detrimental."

4.113 Policy N4 – Local Biodiversity Action Plans

“In respect of habitats and species, The Council will have regard to Local Biodiversity Action Plans, where available, in addition to Strategic Policy G6, in the consideration of development proposals.”

4.114 The potential effects that the proposed Wind Farm may have upon international, national and local natural heritage designations has been assessed in Chapter 6 – Ecology and Chapter 7 – Ornithology of the ES and in Table 4.2 above. Overall it is concluded that the proposed Wind Farm will not significantly affect the qualifying interests of any international, national or local natural heritage designations.

4.115 In respect of the habitats and species on the site of the proposed Wind Farm, Chapter 6 – Ecology and Chapter 7 – Ornithology of the ES establish that after the proposed mitigation and best practice methods have been effectively implemented, the impacts on species and habitats will not be significantly detrimental.

Landscape and Scenic Views

4.116 The Structure Plan recognises that the landscape of the Highlands is a valuable resource which makes a significant contribution to the economic, environmental and cultural life of the area.

4.117 Policy L4 – Landscape Character states:

“The Council will have regard to the desirability of maintaining and enhancing present landscape character in the consideration of development proposals, including offshore developments.”

4.118 Chapter 5 – Landscape and Visual Impact of the ES provides a detailed assessment of the impact that the proposed Wind Farm would have on the landscape. As discussed above for SPP, although it is recognised that the proposed Wind Farm will have a significant effect on the landscape character of the site itself, it is concluded that the proposed Wind Farm will not have a significant impact on the landscape character of the area as a whole.

4.119 Additionally, the Structure Plan provides protection for those landscape areas that make a particularly important contribution to tourism within the area.

4.120 Policy T6 – Scenic Views states:

“The Council will protect important scenic views enjoyed from tourist routes and viewpoints, particularly those specifically identified in Local Plans. There will be a presumption against development in narrow areas of land between roads and railways and open water.”
4.121 The proposed Wind Farm has been set back from the main tourist routes and consideration given to the scenic views from the main tourist viewpoints and attractions during the design stage.

4.122 Chapter 5 – Landscape and Visual Assessment of the ES provides a detailed assessment of the impacts that the proposed Wind Farm would have on views from tourist routes and viewpoints. Although the proposed Wind Farm would be visible from the A385 and the A832 and several viewpoints in the surrounding hills and mountains, it is considered that the presence of the Lochluichart Wind Farm should be taken into account when considering the acceptability of the impact on these scenic views. In addition, as considered earlier in this Planning Statement, it should be considered that the acceptability or otherwise of the visual impact of wind farm developments is a largely subjective matter and that several visitor surveys confirm that wind farms are not commonly perceived by viewers as a negative impact.

4.123 In view of the above, it is not considered the proposed Wind Farm will impact on the scenic views from tourist routes and viewpoints to an unacceptable degree.

**Built and Cultural Heritage**

4.124 The Structure Plan also promotes the protection of the built environment and cultural heritage. This can be defined as Conservation Areas and historic settlements, historic and architecturally important buildings, Scheduled Ancient Monuments, archaeological locations and landscapes, historic gardens and designed landscapes.

4.125 Policy BC1 – Preservation of Archaeological Sites states:

> “Archaeological sites affected by development proposals should be preserved, or, in exceptional circumstances where preservation is impossible, the sites will be recorded at developers' expense to professional standards. Provision will be made in Local Plans for the appropriate protection, preservation and enhancement of archaeological sites.”

4.126 Proposal BC3 – Archaeological Heritage Areas states:

> “Local Plans will identify and zone areas of exceptional archaeological and historic interest, and make appropriate provision for the protection and interpretation of features of interest.”

4.127 Policy BC4 – Historic Gardens and Designed Landscapes states:

> “The Council will seek to preserve historic gardens and designed landscapes identified in the published inventory and in any additions to it. Local Plans will contain policies for their protection.”

4.128 Policy BC5 – Listed Buildings and Conservation Areas states:

> “The Council will seek to preserve Highland’s buildings and groups of buildings of historic or architectural interest, some of which may be at risk from neglect, by the identification in Local Plans of opportunities for their productive and appropriate use.”

4.129 The proposed Wind Farm has been assessed in terms of the built environment and cultural heritage in Chapter 10 – Cultural Heritage of the ES and is considered in Table 4.3 and paragraphs 4.26 to 4.30 above.

4.130 It is concluded that there will be no adverse impact, either directly or indirectly, on the built environment and cultural heritage as a result of the proposed Wind Farm.

**Ross and Cromarty East Local Plan 2007**

4.131 The Local Plan was adopted in February 2007 and provides a strategy at a local level for development in the Ross and Cromarty East area for a 5 year period from the date the plan is published. The policies contained within the Local Plan focus primarily on the allocation of
housing and industrial land and have little detail in relation to the development of renewable energy, instead relying on the policies contained within the Structure Plan itself. The Structure Plan thus provides the main Development Plan policy framework on renewable energy and wind farm developments. There are no renewable energy policies specific to this development contained within the Local Plan.

**Site Specific Policy**

4.132 The plan identifies four broad spatial areas which form the basis of the strategy. The proposal site falls within the Rural Development Area which encompasses the Fearn Peninsula, Strathconon and the Garve to Achnasheen corridor.

4.133 The Local Plan also has four classifications for the areas of land outwith settlements. These range from Background Policy (BP) 1 where development is favoured to BP4 where the Council will not favour development unless there are over-riding environmental or public health or safety grounds or unless there are imperative reasons of over-riding public interest including those of a social or economic nature.

4.134 The site area is covered by BP2. This states that:

“The Council will permit development unless this would be likely to have a significantly adverse effect on, or be significantly adversely affected by, the features for which the area has been designated. Where it is concluded that any such adverse effects are likely to arise, development will only be permitted where it is considered that these would be outweighed by social or economic benefits.”

4.135 BP1 to BP4 derive from Policy H3 – Housing in the Countryside of the Structure Plan and do not relate to wind farm development. Consequently it is considered that no weight should be attached to BP2 in relation to the proposed Wind Farm.

4.136 There are a number of other policies in the Local Plan that are of relevance to the proposed Wind Farm. These are addressed as follows:

**Drainage and Flooding**

4.137 **Policy GSP3 – Surface Water Drainage** provides that development proposals will be assessed for any requirement to provide related attenuation and treatment measures and where necessary, remedial works associated with existing drainage systems.

4.138 **Policy GSP4 – Flood Risk** requires that developers demonstrate that no adverse impacts on the characteristics of watercourses will arise and to demonstrate use of best practice in the management and disposal of surface waters.

4.139 The proposed Wind Farm incorporates a range of mitigation methods which are described in Chapter 9 – Hydrology of the ES. The impacts of the proposed Wind Farm on watercourses are also discussed in Chapter 9 – Hydrology of the ES. Part of the application boundary is designated as a Water Catchment Area around Loch Bad Leabhraidh. Following the implementation of the mitigation methods identified, the assessment concludes that the proposed Wind Farm would not have a significant impact on watercourses, or in particular, around Loch Bad Leabhraidh. It is therefore concluded that the proposed Wind Farm complies with Local Plan Policies GSP3 and GSP4.

**Transportation**

4.140 **Policy GSP16 – Transport** provides that particular attention will be paid by the Council in assessing new developments to the impact on the local road network and its ability to accommodate any increases in traffic volumes.
4.141 Chapter 12 – Traffic and Transport of the ES sets out sufficient information to enable the Council to address the transport implications of the proposed Wind Farm. The assessment concludes that there will be a temporary increase in traffic levels on the A9, A835, A832, A890 and A896 during construction. Although this increase will not be significant, to minimise the traffic impact it is proposed to implement a Traffic Management Plan following consultation with the roads authority. The Plan will aim to reduce the movement of construction vehicles during the morning and evening peak traffic hours when the road network is typically at its busiest.

4.142 Traffic generated during the operation and maintenance of the proposed Wind Farm is minimal and will not result in any significant impact. Traffic during the decommissioning phase is likely to be lower than the levels associated with construction.

4.143 In view of the above, it is not considered that there will be a significant adverse impact on the local road network as a result of the proposed Wind Farm.

Conclusions

4.144 The proposed Wind Farm has been assessed against the provisions of SPP, the Structure Plan and Local Plan and is in accordance with the aims and objectives of the policies included therein.
5. OTHER MATERIAL CONSIDERATIONS

Introduction

5.1 The other principal material considerations relevant to the planning authority in determining a planning view of the proposed Wind Farm are discussed below. Material considerations include the National Planning Framework 2 (NPF2), and advice set out in Planning Advice Notes (PANs). They also include the policies of emerging development plans.

Emerging Development Plan

5.2 The Highland Council is at the preliminary stages of preparing a Highland Wide Local Development Plan under the requirements of the Planning etc (Scotland) Act 2006. The Highland Council published the Main Issues Report (MIR) for consultation in August 2009. The proposed plan is timetabled to be published in September 2010 for a 15 week consultation period before the Plan is submitted to Scottish Ministers in March 2011. Three area local development plans (instead of the current seven) will also be prepared, with the Ross and Cromarty East Local Plan being replaced by the Inner Moray Firth Local Development Plan.

5.3 The MIR identifies that the Highland area has great potential for renewable energy production, with onshore wind and hydro electric power currently making a significant contribution to renewable energy production.

5.4 The MIR recognises the need for a new policy framework on wind energy to replace the existing Highland Renewable Energy Strategy, as discussed in detail below. It states that the new guidance will identify areas to be afforded significant protection from wind farms due to their national or international natural heritage value or having regard to cumulative impacts. It will also set out broad areas of search for wind farms and set out criteria for the consideration of proposals in other areas.

5.5 As it currently stands, there are no issues or policy considerations within the emerging Highland Wide Local Development Plan that would suggest that the proposed Wind Farm would be unacceptable in planning terms.

The Highland Renewable Energy Strategy 2006

5.6 The Highland Renewable Energy Strategy (HRES) was approved as supplementary planning guidance in support of the Development Plan by the Council in May 2006. It is a non-statutory document that was prepared in order to clarify the approach that the Council takes to renewable energy, with the intention of helping to give direction and reducing uncertainty regarding issues associated with renewable energy developments in the Highlands.

5.7 The provisions outlined in HRES were aligned with the requirements of the then prevailing NPPG6 and PAN 45. With the publication of SPP6 in March 2007 and its subsequent replacement SPP in February 2010, it is now acknowledged by the Highland Council that the weight that is applied to HRES when determining wind farm applications is limited given that HRES does not fully comply with the approach set out in SPP6/SPP. Consequently the Highland Council is to prepare a new Supplementary Planning Guidance which will align the Council’s approach with SPP and, when produced, this will supersede the planning guidelines section of HRES and parts of the strategy in so far as they relate to onshore wind energy proposals. However, until then HRES remains in force as a material consideration and is read together with the Development Plan and the more recent SPP by the Council when determining wind farm applications.

5.8 A major component of HRES comprises the identification of ‘prospective development zones’ for national and major onshore wind farms on figure 6.2.4 and the inclusion of policy/strategy statements for these (E5 to E7). Three zones are identified: ‘preferred development areas’,
‘possible development areas’ and ‘presumption against development’. The identification of these areas are based on optimal conditions in terms of planning constraints, energy production, technical feasibility and proximity to the grid but are not based on as full a range of information as is now stipulated by SPP. In particular they do not take into account landscape character, sensitivity or capacity.

Site Specific

5.9 The proposed Wind Farm lies within a ‘presumption against development’ area to which Policy/Strategy Statement E7 is relevant. This states:

“Any proposals for national and major projects [in the presumption against development area] will have to overcome a precautionary approach to planning approval. Any development would also need to show that there is no scope for alternative development within other preferred and possible development areas.”

5.10 This policy is not in accordance with the framework approach set out in SPP and therefore it is considered this policy should not be used in the determination of this application. At the Achany Wind Farm Public Inquiry (Ref PPA-270-438) The Highland Council acknowledged that they could not rely on Policy/Strategy Statement E7 locational guidance in the HRES following the publication of SPP6. This point was also acknowledged orally at the current public inquiry at Stroupster Wind Farm Public Inquiry by the Highland Council’s planning witness. The fact is that The Highland Council does not now rely on Policy/Strategy Statement E7 which is of importance for the proposed Wind Farm at Corriemollie.

5.11 Notwithstanding this, even if this policy is applied it should be considered that HRES is not intended to be a site specific planning tool, but a strategic document for the siting of renewable energy developments in the Highlands. At this strategic level the HRES cannot be prescriptive but does provide an initial starting point for the assessment of proposals.

5.12 The key constraint identified by the Renewable Energy Resource Assessment (RERA), the model that informed the HRES, indicates the presumption against development relates to the Ministry of Defence Tactical Training Area. As the ES demonstrates that the proposed Wind Farm is unlikely to significantly impact upon military aviation, the site of the proposed Wind Farm may therefore be considered appropriate for wind farm development.

Landscape

5.13 The HRES maps seek to ensure the locations of wind farms avoid designated landscape areas. However, it also identifies that wind farms outwith, but close to, designated places can have an impact upon the landscape experience within these areas. Policy/Strategy Statement T1 states:

“It is the Council’s aim to avoid intrusive development of windfarms that would affect designated landscape areas. It will also seek to minimise intrusion by renewable developments into historical and other particularly sensitive landscapes.”

5.14 The proposed Wind Farm has been assessed in terms of impact on the immediate and wider landscape in Chapter 5 – Landscape and Visual Impact of the ES. Impacts on landscape designations are also covered in Table 4.1 of the preceding section. The proposed Wind Farm has also been assessed in terms of historical landscapes and their setting in Chapter 10 – Cultural Heritage of the ES and in Table 4.3 of the preceding section. Overall it is considered that the proposed Wind Farm would not have a significantly detrimental impact on the surrounding landscape.

5.15 In order to reduce visual impact, Policy/Strategy Statement S3 provides that devices should also reflect the aesthetics of particular views. It states that:
“Developments should not take place in widely acknowledged and particularly important views, i.e. those generally valued by residents for their lack of other development influences such as wires, poles, signs, buildings, vehicles, or commercial forestry.”

5.16 The proposed Wind Farm has been designed to take account of the physical characteristics of the surrounding area and minimise landscape effects as far as possible. The impact of the introduction of the proposed Wind Farm on views currently enjoyed by local residents and tourists is addressed in Chapter 5 – Landscape and Visual Impact and Chapter 13 – Socio-Economics, Tourism and Land Use of the ES. It is concluded that the proposed Wind Farm would not result in any unacceptable impact on important views.

Cumulative Impact

5.17 Policy/Strategy Statement U1 identifies that “the Council has taken a view that cumulative visibility of larger scale developments in a few localised areas is preferable to developments being scattered across the area. It is, however, also recognised that smaller scale renewable developments are likely to become ubiquitous across Highland in the future and will come to be seen as a prudent response to the challenges created by global warming.”

5.18 This is supplemented by Policy/Strategy Statement U2 which requires that “the cumulative zone of visual influence (ZVI) within a 10 km range for large (national and major) onshore renewables projects should be less than 10% of the land area of Highland.”

5.19 The proposed Wind Farm is located adjacent to the Lochluichart Wind Farm and is therefore in accordance with the general thrust of policy/strategy statement U1.

Cultural Heritage

5.20 Policy/Strategy Statement R2 reinforces Structure Plan policy BC3 and states that:

“Devices should be positioned to avoid direct disturbance of scheduled heritage sites and to protect the landscape in the immediate vicinity of prime visited sites.”

5.21 The proposed Wind Farm has been assessed in terms of heritage resources and their setting in Chapter 10 – Cultural Heritage of the ES and in Table 4.3 of the preceding section. Overall it is considered that the proposed Wind Farm would not have a significant impact on any heritage resources and their setting.

Ecology, Biodiversity and Nature Conservation

5.22 HRES aims to ensure that there is no overall degradation of natural heritage conservation interests in the Highland area from renewable energy developments.

5.23 Policy/Strategy Statement R1 sets out a general presumption against proposals in designated conservation areas unless there are exceptional circumstances “where the energy dividend within such an area is so significant that the overall weight of wider benefits outweighs possible site specific negative impacts.” It also supports enhancement to biodiversity, and states that “wherever possible, renewable energy projects should incorporate positive enhancement of habitats and species associated with development sites in line with wider conservation and biodiversity objectives.”

5.24 The proposed Wind Farm has been assessed in terms of statutory and non statutory nature conservation designations in Chapter 6 – Ecology and Chapter 7 – Ornithology of the ES and in Table 4.4 of the preceding section. Overall it is established that the development will not adversely affect any sites of nature conservation interest.

5.25 It should also be noted that the proposed Wind Farm will present opportunities for positive enhancement of habitats and species as a result of the removal of the area of coniferous forestry.
5.26 **Policy/Strategy Statement J1** provides that all national, major and local scale renewables projects should undertake a pre-scoping phase of evaluation before locations, timing, and development type are specified.

5.27 All pre-application requirements have been carried out as per The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008.

5.28 **Policy/Strategy Statement J2** provides that at a national and major level, consideration of alternatives should establish that there is advantage in locating the development in the Highland area and/or that the development will specifically support policy objectives set for the Highland area.

5.29 The proposed Wind Farm can play a significant part in achieving sustainable development through the generation of energy from a sustainable source, whilst the ES establishes that the proposed Wind Farm will not significantly diminish environmental quality.

5.30 **Policy/Strategy Statement S1** provides that devices should be positioned far enough away from residential areas and working places to avoid direct nuisance and disturbance.

5.31 The proposed Wind Farm has been assessed in relation to the amenity of nearby towns, villages and residential properties within the ES. Overall it is concluded that the proposed Wind Farm would not result in unacceptable disturbance to residential areas or working places by reason of noise, emission, visual dominance or other nuisance.

5.32 **Policy/Strategy Statement S2** provides that devices should be positioned so as to maintain at least a 1 km separation between dwellings and wind turbines.

5.33 The proposed Wind Farm is compliant with this policy.

5.34 **Policy/Strategy Statement W1** provides that renewable energy developments should be sympathetic to the aesthetic qualities valued in the Highland landscapes and should not restrict or inhibit leisure, recreation and visitor activities.

5.35 The layout and design of the proposed Wind Farm has sought to minimise, and where possible avoid, impacts upon the aesthetic quality of the area. The design of the proposed Wind Farm has also sought to be sympathetic to the adjacent Lochluichart Wind Farm. Overall it is considered that the proposed Wind Farm represents an optimal fit within the technical and environmental parameters of the project.

5.36 Chapter 13 – Socio-Economics, Tourism and Land Use of the ES concludes that the proposed Wind Farm will not restrict or inhibit leisure, recreation or visitor activities.

**National Planning Framework 2**

5.37 NPF2 was approved by the Scottish Parliament in 2009 and sets out a framework for strategic development priorities in Scotland to 2030 to support sustainable economic growth. NPF2 continues on from the National Planning Framework by identifying key issues and building on the strengths in the different regions of Scotland and identifying the drivers of change.

5.38 Paragraph 144 states “**inline with EU objectives, the Scottish Government is committed to working towards deriving 20% of total energy use for renewable sources by 2020.**”

5.39 Paragraph 155 goes on to state that “**the Government is committed to establishing Scotland as a leading location for the development of renewable energy technology and an energy exporter over the long term. The aim of national planning policy is to develop Scotland’s renewable energy potential whilst safeguarding the environment and communities.**”
5.40 The proposed Wind Farm would make a valuable contribution to achieving the Government's renewable energy targets whilst minimising adverse impacts on the environment and communities in accordance with the Government's objectives.

PAN 45: Renewable Energy Technologies

5.41 PAN 45 sets out good practice guidance in respect of the issues raised by wind farm developments including siting in the landscape, visual impact and noise.

- "There are no landscapes into which a wind farm will not introduce a new and distinctive feature. Given the Scottish Minister's commitment to addressing the important issue of climate change and the contribution expected from renewable energy developments, particularly wind farms, it is important for society at large to accept them as a feature of many areas of Scotland for the foreseeable future." (paragraph 71)

- But, "This is not to suggest that areas valued for their international or national landscape and nature conservation interest will have to be sacrificed. Nor that elsewhere, attempts to lessen the impacts by integrating the development into the surrounding countryside would not be worthwhile." (paragraph 72)

- Pan 45 recognises that wind turbines located in open land wind farms are likely to be highly visible and that it is unrealistic to seek to conceal them. "Developers should seek to ensure that through good siting and design, landscape and visual effects are limited and appropriate to the location. The visual effect will be dependent on the distance over which a wind farm may be viewed, whether the turbines can be viewed adjacent to other features, different weather conditions, the character of the development and the landscape and nature of the visibility." (paragraph 78)

- Finally, PAN 45 notes the important contribution that tourism, mainly associated with Scotland's natural, scenic and cultural heritage, makes to the rural economy. "It is therefore important that the role of tourism in the rural economy and the assets on which it is based should be reconciled with the need to promote renewable energy generation." (paragraph 172)

PAN 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms

5.42 PAN 45 Annex 2 gives advice to planning authorities on the formation of supplementary planning guidance for windfarms, in particular the process of preparing spatial frameworks.

5.43 It encourages planning authorities to have up-to-date policies for windfarm developments that reflect national policy contained with SPP6 (now SPP), noting the importance of this in turn for guiding the preparation of windfarm applications and their determination.

5.44 PAN 45 also identifies the broad criteria for assessing all windfarm proposals that should be addressed in the supplementary guidance. These include:

- impacts on landscapes;
- impacts on the historic environment;
- ecology (including birds);
- biodiversity and nature conservation;
- the water environment;
- communities;
- aviation;
- communications;
- noise;
- shadow flicker; and
- cumulative impacts.
5.45 In line with the above broad criteria, the PAN states that protected locations such as SPAs, SACs and Ramsar sites will be safeguarded against any development, including that of renewable technologies in order to maintain Scottish Government policy relating to the protection of such sites. Designated sites landmarked as renewable energy locations must be guided away from these protected areas.

5.46 The proposed Wind Farm has been assessed in terms of the broad criteria identified above within the ES in accordance with this PAN.

Other Planning Advice Considerations

5.47 Other relevant PANs are assessed in Table 5.1 below.

<table>
<thead>
<tr>
<th>PAN</th>
<th>Advice Note</th>
<th>Policy Objectives</th>
<th>Policy Compliance</th>
<th>ES Chapter</th>
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</thead>
<tbody>
<tr>
<td>PAN42: Archaeology – the Planning Process and Scheduled Monument Procedures</td>
<td>Sets out a presumption in favour of preserving in situ archaeological sites of national importance. Provides that where there are known features of cultural heritage interest of less than national importance within or near potential development sites, it is appropriate for significant effects on these to be mitigated by a programme of archaeological field investigation and preservation by record, if their destruction is unavoidable.</td>
<td>The proposed Wind Farm will not have any significant effects on any archaeological interests on the site.</td>
<td>Chapter 10</td>
<td></td>
</tr>
<tr>
<td>PAN56: Planning and Noise</td>
<td>Provides guidance on ways of mitigating the adverse impacts of noise and the use of planning conditions relating to noise. With regard to wind farms, the PAN states that good acoustical design and siting of turbines is essential to ensure that there is no significant increase in ambient noise levels as they affect the environment and any nearby noise-sensitive property.</td>
<td>The proposed Wind Farm will have no significant impact upon the amenity of residential properties or communities as a result of noise.</td>
<td>Chapter 11</td>
<td></td>
</tr>
<tr>
<td>PAN58: Environmental Impact Assessment</td>
<td>Provides guidance on the content of, and approach to, Environmental Impact Assessment.</td>
<td>An ES has been submitted in accordance with the requirements of PAN58.</td>
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</tr>
<tr>
<td>PAN60: Planning for Natural Heritage</td>
<td>Provides advice on how the planning system can contribute to the conservation, enhancement, enjoyment and understanding of Scotland’s natural environment and encourages developers and planning authorities to be positive and creative in addressing natural heritage issues.</td>
<td>The impacts of the proposed Wind Farm on the natural heritage will not be significantly detrimental and includes measures for the enhancement of habitats.</td>
<td>Chapters 6 and 7</td>
<td></td>
</tr>
<tr>
<td>PAN69: Planning and Building Standards Advice on Flooding</td>
<td>Seeks to prevent developments which would be at significant risk of being affected by flooding and to prevent developments which would increase the probability of flooding elsewhere.</td>
<td>The location and design of the proposed Wind Farm poses no flood risk.</td>
<td>Chapter 9</td>
<td></td>
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Conclusion on Material Considerations

5.48 The details of the proposed Wind Farm have been assessed against the provisions of the HRES, NPF2, PAN45 and the other relevant PANs and are in accordance with the aims and objectives of the policies included therein.
6. CONCLUSIONS

6.1 This Planning Statement demonstrates that the proposed Wind Farm is consistent with current UK and Scottish Government energy policies and targets for power generation from renewable sources. It complies with the aims, objectives and policies of national planning policy and is in accord with the policy requirements of the development plan.

6.2 The ES highlights that the proposed Wind Farm has undergone a number of design iterations in response to environmental constraints and demonstrates that the development can be undertaken in an environmentally acceptable manner.

6.3 It is therefore submitted that the proposed Wind Farm is acceptable in planning terms.
REFERENCES


FIGURE PS2 – SITE LAYOUT PLAN