4 ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

4.1 Scoping

4.1.1 An underlying principle of the EIA process is that it should concentrate on environmental issues where effects associated with a development proposal are likely to be significant.

4.1.2 Although it is not mandated by the EIA Regulations (2017a), the Proposed Development was subject to a detailed scoping exercise, submitted to the ECU in January 2024 in order to determine issues that should be addressed in the EIA and the form topic-based assessments should take.

4.1.3 The following considerations were factored into the scoping process:

- The nature of the receiving environment, and the type of operations associated with the Proposed Development are such that environmental effects could arise during construction, operation and decommissioning stages.
- A review of the Site revealed ecological habitats and species of potential interest.
- There is a requirement for early liaison with stakeholder and regulatory authorities (e.g. Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES)) to provide input for the EIA and design development processes.
- There is a need for early consultation and commencement of ecological and ornithological surveys, peat depth probing and noise monitoring to accommodate data collection within seasonal and programme constraints.
- Significant cumulative effects could potentially arise through the interaction of the project with other existing and approved development projects in the vicinity, and the combined effects of two or more environmental aspects associated with the Proposed Development on environmental interests (e.g. combined visual and noise effects on local residents).

Scoping Process

4.1.4 The scoping exercise involved a review of available environmental information on the existing environment; preliminary desk-based and site-based appraisals and surveys; and application of knowledge of the potential environmental implications of comparable schemes (based on direct past project experience and other published experience and guidance).

4.1.5 The outcomes of the scoping exercise were collated in a Scoping Report that accompanied a formal request for a Scoping Opinion that was issued by the Applicant to the ECU in January 2024. The Scoping Report identified the environmental aspects that the Applicant proposed to address within the EIA for the Proposed Development. It discussed each aspect in terms of a brief summary of the environmental baseline for each (where practical), the relevant potential impacts and an overview of the proposed method of assessment for each. Where relevant, the technical areas were assessed in the context of industry guidance, best practice, and likely design of the Proposed Development.

4.1.6 Following receipt of the Scoping Request, the ECU undertook consultation with statutory and non-statutory agencies and other environmental bodies with knowledge of the Site. The ECU issued its Scoping Opinion to the Applicant on 11 April 2024, with the following bodies having provided responses:

- The Highland Council;
- NatureScot;
- Scottish Environment Protection Agency;
- Historic Environment Scotland;
- Aberdeen Airport;
- British Telecommunications (BT);
- Crown Estate Scotland;
- Defence Infrastructure Organisation;
- Edinburgh Airport;
- Fisheries Management Scotland;
- Glasgow Airport;
- Glasgow Prestwick Airport;
- Highlands and Islands Airport Limited;
- Joint Radio Company (JRC);
- Met Office;
- Mountaineering Scotland;
- NATS Safeguarding;
- Office for Nuclear Regulation;
- Royal Society for the Protection of Birds (RSPB) Scotland;
- Scottish Forestry;
- ScotWays;
- The Coal Authority; and
- Transport Scotland

4.1.7 The following consultees were also contacted, but no responses were received:

- British Horse Society;
- Civil Aviation Authority – Airspace;
- Dornie and District Community Council;
- Fort Augustus and Glenmoriston Community Council;
- Glengarry Community Council;
- John Muir Trust;
- Kyle Community Council;
- Lochduich Community Council;
- Lochalsh Community Council;
- National Grid;
- National Trust for Scotland;
- Ness District Salmon Fishery Board;

- Ness and Beauty Fisheries Trust;
- Oban Airport;
- Saving Wildcats;
- Scottish Water;
- Scottish Wildlife Trust;
- Scottish Wild Land Group;
- Visit Scotland; and
- Woodland Trust.

4.1.8 The consultee / consultation responses provided in the Scoping Opinion were addressed via consultation response letters as appropriate, and a Gatecheck Report. The scope of the EIA was modified accordingly. Additional consultation relating to the submitted Gatecheck Report can be found in **Section 4.2**.

4.1.9 The scope of the individual assessments has been reviewed regularly throughout the EIA process to take account of new published guidance and / or assessment methodologies, stakeholder feedback, new environmental information and ongoing scheme design changes.

4.1.10 Explanations of the methods of assessment adopted and the issues identified are provided in **Chapters 5** to **14** of this EIA Report, which detail the findings in relation to the various environmental aspects considered in the EIA.

Scope of the EIA

4.1.11 The Scope of the EIA has been approved by the ECU via the issued Scoping Opinion and following correspondence between the Applicant, the ECU, and statutory consultees. Relevant correspondence is summarised within the Gatecheck Report, which is available as **Technical Appendix 2.3**.

Environmental Aspects

4.1.12 The following aspects were relevant for investigation in the EIA owing to the potential for significant environmental effects to arise:

- Landscape and Visual (**Chapter 5**);
- Ecology (**Chapter 6**);
- Ornithology (**Chapter 7**);
- Hydrology, Hydrogeology, Geology and Peat (**Chapter 8**);
- Archaeology and Cultural Heritage (**Chapter 9**);
- Traffic and Movement (**Chapter 10**);
- Noise and Vibration (**Chapter 11**);
- Aviation and Radar (**Chapter 12**);
- Climate Change (**Chapter 13**); and
- Shadow Flicker (**Chapter 14**).

4.1.13 The following environmental aspects were reviewed and have subsequently been scoped out of the EIA based on the limited potential for environmental effects to arise:

- Air quality: The main source of impact on air quality would be increased traffic flows on local roads during construction and emissions from construction activities. It is considered that air emissions associated with these activities would be transient and localised, and highly unlikely to have a significant effect on local air quality. Best practice measures would be applied to construction, forming an integral part of the Environmental Management Plan (EMP)[12]. There would be no emissions to air during operation.
- Population and Human Health: Properly designed and maintained wind turbines are safe technologies. Limited interactions with population and human health are possible, and potential effects on Aviation and Radar, Traffic and Transportation, Noise, Shadow Flicker and Residential Amenity will be considered in the EIA Report.
- Vulnerability of the Proposed Development to risks of major accidents and/or disasters (including climate change): None of the following climate trends identified in the UK Climate Projections (UKCP18)13 would affect the Proposed Development: i.e. increased temperatures, changes in the frequency, intensity and distribution of rainfall events, increased windstorms and sea level rise. Braking mechanisms on turbines allow them only to be operated under specific wind speeds, and given the elevated location of the Site, flooding would not pose a significant risk to the Proposed Development. Furthermore, the Proposed Development would not contribute to flooding elsewhere.
- Electromagnetic Interference and Telecommunications: A telecommunications assessment in relation to the Proposed Development was undertaken. Through the impact assessment and subsequent consultation process, no telecommunication links were identified within, or in close proximity to the Site. Hence, no effects on the telecommunications network are anticipated as a result of the Proposed Development, and telecommunications were scoped out of the EIA.
- Socio-economics, Tourism, Recreation, and Land-use: Empirical evidence associated with renewable and onshore wind development indicates that adverse significant effects are unlikely to occur from the Proposed Development. Therefore, socio-economics, tourism, recreation, and land-use issues have been scoped out of the EIA. Instead, a **Socio-Economic Statement** will be prepared and submitted alongside the application for consent. The objective of the Socio-economic Statement will be to predict positive and negative socio-economic effects that might arise from the construction and operation of the Proposed Development.
- Forestry: No forestry would be affected for the construction of the Proposed Development, as no infrastructure was designed within existing or planned woodland areas. In addition, upon review of the swept path analysis along the existing Millennium Wind Farm track, it has been confirmed that no felling is required for the delivery of turbine components to the turbine locations (to accommodate truck overrun or blade oversail).

[12] An EMP is a guidance document to measure and achieve compliance with the environmental protection and mitigation requirements of a project.

[13] The UK Climate Projections (UKCP) is a set of tools and data that shows you how the UK climate may change in the future. Climate change projections over land available at: https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/summaries/climate-change-projections-over-land

4.1.14 The ECU has also confirmed, via written correspondence, that the relationship and compliance of the Proposed Development to local, regional and national planning policy would be best established in a separate planning statement. Accordingly, the Applicant has prepared a standalone Planning Statement to accompany s36 application for the Proposed Development. It also references climate change legislation and objectives and the contribution of the Proposed Development to both UK and Scottish Government climate change targets.

4.2 Additional Consultation

Gatecheck Report

4.2.1 As part of the s36 application process, RSK prepared and submitted a Gatecheck Report for the Proposed Development to the ECU on 27 February 2025. A copy of the issued Gatecheck Report is available as **Technical Appendix 2.3**.

4.2.2 The Gatecheck Report described the design evolution of the Proposed Development since the feasibility stage, including, where relevant, changes that have been made in response to consultation and community engagement. The document also set out the scope of the EIA in advance of the application for consent being made.

4.2.3 Responses to the Gatecheck Report were received from the following stakeholders:

- Scottish Environment Protection Agency (SEPA);
- Historic Environment Scotland; and
- NatureScot.

4.2.4 The feedback received has been addressed and incorporated in the EIA Report where relevant.

Aviation Lighting Consultation

4.2.5 A document providing information on the Proposed Development and of the proposed aviation lighting scheme was issued in November 2024 with a request for feedback from key aviation stakeholders.

4.2.6 Having collected the views of the stakeholders a final scheme was lodged with the Civil Aviation Authority (CAA) for their approval, along with all the feedback provided in this consultation.

4.2.7 The lighting scheme was approved by the CAA via written correspondence in January 2025.

4.2.8 Full details of the proposed aviation lighting scheme are outlined in **Chapter 12: Aviation and Radar**.

4.3 Environmental Impact Assessment (EIA)

Legislation

Regulation 4 of the EIA Regulations (2017a) states that the EIA must identify, describe and assess the direct and indirect significant effects of the Proposed Development on the following factors and the interaction between these factors:

- population and human health;
- biodiversity;
- land, soil, water, air and climate; and
- material assets, cultural heritage and the landscape.

4.3.1 The findings of the EIA should be included in an EIA Report prepared by the developer. Regulation 5 sets out the content of an EIA Report. The EIA Report must identify, describe and assess the potential direct and indirect significant effects of the Proposed Development and the potential interactions between those factors. The description should detail the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the proposed development.

4.3.2 Schedule 4 of the EIA Regulations sets out the information that must be included in the EIA Report, including:

- Description of the development, including in particular:
  - a description of the location of the development;
  - a description of the physical characteristics of the whole development;
  - a description of the main characteristics of the operational phase of the development;
  - an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases).
- A description of the reasonable alternatives studied by the developer;
- A description of the relevant aspects of the current state of the environment (the 'baseline scenario') and an outline of the likely evolution thereof without implementation of the project;
- A description of the factors specified above likely to be significantly affected by the development;
- A description of the likely significant effects of the development on the environment, resulting from:
  - the construction and existence of the development, including, where relevant, demolition works;
  - the use of natural resources, in particular land, soil, water and biodiversity;
  - the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances and the disposal and recovery of waste;
  - the risks to human health, cultural heritage or the environment;
  - the cumulation of effects with other existing and/or approved development;

- the impact of the development on climate and the vulnerability of the development to climate change; and
- the technologies and the substance used;

- A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment;
- A description of the mitigation measures envisaged to avoid, prevent, reduce and if possible, offset any significant adverse effects on the environment and, where appropriate, of any monitoring arrangements;
- A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned;
- A non-technical summary of the information covered by the points above; and
- A reference list detailing the sources used for the descriptions and assessments in the EIA report.

EIA Delivery

4.3.3 Insofar as practical, a common approach has been adopted in the undertaking and reporting of individual environmental assessments.

EIA Guidance

4.3.4 The EIA has been undertaken with regard to the following published best-practice guidance:

- Scottish Government (2017b), Planning Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment)(Scotland) Regulations 2017[14];
- Scottish Government (2013), Planning Advice Note 1/2013: Environmental Impact Assessment;
- Scottish Government (2014b), Web Based Guidance Onshore Wind Turbines;
- IEMA (2004), Guidelines for Environmental Impact Assessment;
- Scottish Natural Heritage (2013), A Handbook on Environmental Impact Assessment: Guidance for competent authorities, consultees and others involved in the Environmental Impact Assessment process in Scotland;
- IEMA (2017), Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice;
- Morris and Therivel (2009), Methods of Environmental Impact Assessment;
- IEMA (2011), The State of Environmental Impact Assessment in the UK; and
- IEMA (2016), Environmental Impact Assessment Guide to Shaping Quality Development.

Establishing of Baseline Environment

4.3.5 The EIA of scoped-in environmental aspects commenced with the identification and review of information relating to known, or the likely presence of, environmental receptors and

[14] Note: there is no planning circular or PAN for the Electricity EIA Regulations, and the planning circular contains information which is generally applicable to all EIA developments.

resources within a defined study area in order to determine their relative value, importance and/or sensitivity towards change.

4.3.6 Environmental resources were defined as those environmental aspects that support and are essential to natural or human systems. These include areas or elements of population, ecosystems, watercourses, air and climatic factors, landscape, and material assets.

4.3.7 Environmental receptors were defined as people (i.e. occupiers of dwellings and users of recreational areas, places of employment and community facilities) and elements within the environment (e.g. flora and fauna) that rely on environmental resources.

4.3.8 Desk-based data sources comprised consultation responses; published literature; databases, records and schedules relating to environmental designations; national, regional and local policy documentation; historic and current mapping; aerial photography; and data gathered from previous environmental studies.

4.3.9 Site surveys were undertaken to verify and consolidate information gathered during the desk-based review, and to evaluate the relationships between specific environmental interests and their wider environmental value.

4.3.10 Study area extents vary in accordance with the environmental aspect being considered. For some topics, a study area has been defined as being relatively localised to the Proposed Development, while for others it has extended outward to capture the surrounding road network, distant communities, and environmentally sensitive areas. The definition of each study area has been informed by a review of the relationship between the proposed scheme and the receiving environment, the outcomes of scoping, and reference to thresholds stipulated in topic-specific EIA guidance.

Impact Prediction and Assessment

4.3.11 Impacts comprise identifiable changes to the baseline environment. These can be either beneficial (e.g. introduction of planting to screen visually detracting elements) or adverse (e.g. loss of an attractive environmental component), and can take the following forms:

- direct [primary] (e.g. loss of habitat to accommodate the Proposed Development);
- indirect [secondary] (e.g. pollution downstream arising from silt deposition during earthworks);
- transboundary short-term/temporary (e.g. dust generated during construction);
- medium-term (e.g. cutting back of planting which is subsequently allowed to regenerate);
- long-term/permanent (e.g. improvement in air quality); and
- cumulative (e.g. incremental changes caused by other past, present or reasonably foreseeable actions together with those associated with the proposed scheme, or where a receptor or resource is subject to a combination of individual impacts such as air pollution, noise and visual impact associated with the proposed scheme in isolation).

4.3.12 Impact assessments have been both quantitative and qualitative in nature and based on comparisons between the environmental conditions immediately prior to the assumed construction of the Proposed Development and the predicted environmental conditions

resulting from its implementation. Each technical chapter of the EIA Report describes the forecasting methods used in the EIA.

4.3.13 Impacts have been defined in accordance with accepted terminology and standardised methodologies to predict the magnitude of impact (or change) resulting from the Proposed Development.

4.3.14 Assessments have been undertaken for the year of construction and in the year when the Proposed Development would become operational. Some environmental aspects have required further assessment beyond the operational year to take account of factors such as predicted traffic growth.

4.3.15 Where relevant, the assessments describe the expected significant effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters relevant to the proposed scheme. This includes consideration of effects resulting from future climate change and the vulnerability of the project to climate change.

Environmental Effects

4.3.16 Effects are defined as the consequence of impacts. They are formulated as a function of the receptor/resource value and sensitivity, and the predicted magnitude of impact.

4.3.17 Professional judgement, defined thresholds, established criteria and standards have been used to report the environmental effects of impacts, which can be referred to as either being prior to, or following establishment of, environmental mitigation.

Environmental Mitigation

4.3.18 Environmental mitigation measures have been developed to address potentially significant adverse environmental effects.

4.3.19 Mitigation can take the form of agreed measures incorporated into the evolving design of the Proposed Development (e.g. environmental treatments), standard measures (e.g. best practice construction management to control dust emissions) that are enforceable through planning conditions, and measures proposed in outline (e.g. off-site planting to provide visual screening to nearby residential dwellings) that may require further development and formal agreement to ensure their implementation.

4.3.20 The principles adopted in the identification and development of environmental mitigation for the Proposed Development are avoidance (wherever possible), reduction (where avoidance cannot be achieved) and compensation (where reduction is unachievable or would not achieve the required level of mitigation).

Significance of Environmental Effects

4.3.21 The significance of an environmental effect has been established by way of reference to the importance/value of affected resources; the number and sensitivity of affected receptors; impact magnitude, duration, frequency and extent of effect; and the reversibility of effect (or the extent to which the adverse effects can be effectively reduced).

4.3.22 The following generic significance criteria (**Table 4.1**) have been applied across the environmental aspects to ensure identified environmental effects are assessed in a comparable manner, except where such criteria are not applicable due to other prevailing topic-specific guidance (e.g. ecological impact assessment) and/or established standards and thresholds (e.g. noise limits):

Table 4.1 Generic Significance Criteria

Level of effect	Description
Major	Very large or large change in environmental conditions. These effects, both adverse and beneficial, are likely to be important considerations at a national to regional level because they contribute to achieving national / regional objectives or are likely to result in exceedance of statutory objectives and/or breaches of legislation.
Moderate	Intermediate change in environmental or conditions. These effects are likely to be important considerations at a regional and local level.
Minor	Small change in environmental conditions. These effects may be raised as local issues but are unlikely to be of importance in the decision-making process.
Negligible	No discernible change in environmental conditions (i.e. variation within normal bounds or below measurable levels). An effect that is likely to have a negligible or neutral influence, irrespective of other effects.

4.3.23 Only major and moderate effects, which are likely to be factors in deciding whether a development is acceptable, are significant effects. Significance assumes only embedded and standard construction mitigation measures are in place, these being the environmental mitigation measures for which delivery and implementation can be secured.

4.3.24 The residual effects (i.e., the post-mitigation effects) of the Proposed Development are considered by the Scottish Ministers in the decision-making process when determining the Section 36 application.

4.4 Assessment Reporting

4.4.1 Each individual assessment follows a comparable format to ensure consistency in reporting the existing environmental conditions and the potential effects on them arising from implementation of the Proposed Development.

- **Introduction** introduces the assessment topic under consideration.
- **Scope and Methodology** identifies and describes the scope of the assessment, the methods and criteria adopted, relevant guidance followed, and any assessment limitations, assumptions or difficulties encountered.
- **Consultation Undertaken** summarises the stakeholder engagement including dialogue with statutory consultees and with other stakeholders and where relevant the influence on the EIA.
- **Statutory and Planning Context** outlines statutes, guidance, policies and plans relevant to the environmental interests forming the focus of the assessment.

- **Existing Environment** describes the features and characteristics associated with the baseline environment.
- **Predicted Impacts** reports the predicted impacts on the baseline environment during the construction and operational phases.
- **Mitigation** details all measures that have been incorporated into the design of the project and/or agreed as deliverable, including proposed monitoring where applicable.
- **Summary of Residual Effects** summarises the nature and significance of residual environmental effects that are predicted to remain, post-implementation of mitigation measures.

4.5 Assumptions, Uncertainties and Limitations

4.5.1 The EIA was undertaken, and the resulting EIA Report compiled, using the environmental information made available to the EIA team by the Applicant and members of its project team, together with other readily available and publicly accessible material including existing literature and studies, as well as personal communication with local experts. To the best of the EIA team's knowledge, the information used as a basis for the assessment is accurate and up to date. The team is not aware of any limitations of the underlying information or of any constraints that would materially affect the evaluations.

4.5.2 RSK have also carried out its own site visits, surveys and investigations at or in the vicinity of the Site to provide more information for the assessments and to fill data gaps. This has resulted in a more complete and up to date set of baseline data to use as the basis for the impact assessment. Although the data have been collected over a period of time, RSK is of the opinion that the data is relevant and valid at the time of reporting. It should be noted that the surveys and investigations are conducted on a sampling basis, and this places a limit on the certainty of the data set.

4.5.3 This EIA Report has been based on the best available information at the time of publication. However, further information may become available during the detailed design phase that would be used to inform the project if relevant.

4.5.4 Assumptions adopted in the evaluation of impacts are reported in each of the relevant sections. However, these assumptions are often implicit and rely on expert judgement. Any assumptions and known technical deficiencies have been documented.

4.5.5 The EIA has been undertaken during the initial design phase of the Proposed Development and therefore some of the technical aspects of the construction and operation have yet to be determined. Where an alternative option could cause additional impacts, these are discussed within the relevant sections. In addition, the EIA has taken a precautionary approach to adopt conservatism in the assumptions made and any scenarios assumed, so that a reasonable 'worst-case' scenario was assessed. Therefore, inherent uncertainties are accounted for and subsequent modifications to the project during the detailed design phase are less likely to fall outside of the assumed envelope of the assessment parameters.

4.6 References

IEMA (2017), 'Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice'.

IEMA (2016), 'Environmental Impact Assessment Guide to Shaping Quality Development'.

IEMA (2011), 'The State of Environmental Impact Assessment in the UK'.

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