



Nadara Limited

Millennium East Wind Farm

An extension to Millennium Wind Farm

Gatecheck Report

664052

FEBRUARY 2025





RSK GENERAL NOTES

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ABBREVIATIONS

AIL	Abnormal Indivisible Load
AOD	Above Ordnance Datum
BESS	Battery Energy Storage System
BT	British Telecommunications
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment Report
EMP	Environmental Management Plan
JRC	Joint Radio Company
km	Kilometre(s)
LVIA	Landscape and Visual Impact Assessment
m	Metre(s)
MW	Megawatts
RSK	RSK Environment Ltd
RSPB	Royal Society for the Protection of Birds
s36	Section 36
SoCC	Statement of Community Consultation
SEPA	Scottish Environment Protection Agency
The Council	The Highland Council
UKCP18	UK Climate Projections
ZTV	Zone of Theoretical Visibility

1 INTRODUCTION

1.1 Background to the Proposed Development

- 1.1.1 Nadara Limited (hereafter referred to as “the Applicant”) is proposing to construct and operate the Millennium East Wind Farm (hereafter referred to as “the Proposed Development”), as an extension to the existing Millennium Wind Farm.
- 1.1.2 The Proposed Development would involve the construction and operation of eight wind turbines (three with tip heights of up to 200 m, and five with tip heights of up to 180 m), a battery energy storage system (BESS) and associated infrastructure. Each turbine is likely to generate approximately 6.6 Megawatts (MW) of electricity. The approximate maximum generating capacity of the BESS would be up to 20 MW. The total installed capacity of the Proposed Development is expected to be greater than 50 MW.
- 1.1.3 The Applicant is seeking to secure approval for the Proposed Development by way of an application for consent under Section 36 (s36) of the Electricity Act 1989 and the Electricity Works (Environmental Impact Assessment) Scotland Regulations 2017 (hereafter referred to as “the EIA Regulations”) from the Scottish Ministers.
- 1.1.4 The location of the Proposed Development is shown in **Figure 1**. Additional information in relation to the Site and the Site Layout are detailed in **Section 2: Proposed Development**.

1.2 Purpose and Structure of the Gatecheck Report

- 1.2.1 RSK Environment Ltd (RSK) has been commissioned by the Applicant to undertake the Environmental Impact Assessment (EIA) for the Proposed Development. This Gatecheck Report has been prepared in accordance with the Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989 (2022), as established by the Scottish Government’s Energy Consents Unit (ECU).
- 1.2.2 This Gatecheck Report describes the design evolution of the Proposed Development since the feasibility and scoping stages, including, where relevant, changes that have been made in response to consultation and community engagement. The report also sets out the proposed final scope of the EIA in advance of submission of the application for consent.
- 1.2.3 The report is structured as follows:
 - **Section 2** presents the design of the Proposed Development – including a Site description and design iterations undertaken;
 - **Section 3** describes the scoping consultation;
 - **Section 4** describes community engagement strategy; and
 - **Section 5** presents the application details, along with the timeline for advertising and submission of the application.

1.2.4 The Gatecheck Report is accompanied by four appendices, as follows:

- **Appendix 1** comprises figures, showing the Site location, design iterations and proposed layout.
- **Appendix 2** is a consultation matrix summarising consultee responses and the Applicant's response to each issue raised.
- **Appendix 3** comprises confirmed viewpoints agreed with The Highland Council and NatureScot for visualisations and Landscape and Visual Impact Assessment (LVIA).
- **Appendix 4** outlines the cumulative baseline for the LVIA.

2 DESIGN OF THE PROPOSED DEVELOPMENT

2.1 Site Description

- 2.1.1 The Proposed Development is located entirely within the administrative area of the Highland Council (hereafter referred to as 'the Council') local authority. The Site¹ is located to the east of the existing Millennium Wind Farm, approximately 7.5 kilometres (km) west of Fort Augustus, 8 km north of Invergarry and 14 km south-west of Invermoriston. **Figure 1** shows the location of the Proposed Development. The Application Boundary of the Proposed Development is outlined on **Figure 2**.
- 2.1.2 The Site sits within broadly undulating upland moorland, gently sloping downwards from southwest to northeast. The elevations of the Site range from 670 m Above Ordnance Datum (AOD) at the mid-western section of the Site, to the Site access junction by A887 at 129 m AOD.
- 2.1.3 Site access is currently gained by an existing access track leading to the operational Millennium Wind Farm, running southwards from the A887.
- 2.1.4 As well as being used for the generation of renewable energy, the Site is currently used for livestock grazing and deer stalking. Surrounding land uses also include upland grazing and commercial forestry.

2.2 Key Design Principles

- 2.2.1 The overarching principles influencing the design of the Proposed Development include maximising the amount of new renewable energy generation from the Site, while:
- Permitting the continued operation and energy generation from the existing Millennium Wind Farm turbines;
 - Minimising land-take to construct infrastructure by utilising existing infrastructure as far as possible;
 - Minimising potential impacts on the natural environment through careful siting and design;
 - Siting and designing new infrastructure to avoid or minimise significant landscape and visual impacts;
 - Minimising the number of watercourse crossings required, as far as practicable; and
 - Identifying suitable opportunities for environmental and ecological enhancement.

¹ Refers to everything within the Site Boundary, which describes the red-line boundary.

- 2.2.2 A Design and Access Statement (DAS) will be submitted with the s36 application for the Proposed Development. The DAS will be prepared in accordance with guidelines set out in planning advice note (PAN) 68 'Design Statements', and will outline the design policies, sustainable design principles, and any other considerations that have led to the final design layout of the Proposed Development

2.3 Design Evolution

- 2.3.1 As part of an iterative design process, the Proposed Development has undergone several iterations in response to emerging environmental and engineering considerations, including:
- Environmental constraints information based on desktop studies, followed by ongoing detailed surveys;
 - Feedback received through the The Council's pre-application service, the pre-application consultation pack and EIA scoping responses from statutory and non-statutory consultees;
 - Detailed Zone of Theoretical Visibility (ZTV) analysis from key viewpoints;
 - Detailed feedback received from technical specialists assessing the anticipated effects of the Proposed Development;
 - Feedback received through the first round of public consultations undertaken in February 2024;
 - Engagement with Scottish Environment Protection Agency (SEPA) in relation to infrastructure layout amendments with the aim of minimising impacts on peat and hydrological receptors (spring and summer 2024); and
 - Technical design constraints relating to the infrastructure requirements for the Proposed Development.
- 2.3.2 The final layout design iteration of the Proposed Development, as shown in **Figure 3**, has been developed through four principal iterations of the layout as shown in **Figure 4**, while **Figure 5** provides more detailed environmental constraints information such as the Phase 1 and Phase 2 peat depth survey results, bog pools, watercourses and watercourse buffers, and demonstrates how new infrastructure placement has avoided these constraints.

Access Route

- 2.3.3 For the delivery of abnormal indivisible loads (AIL) components on Site, alternative ports of entry and delivery routes were considered by preliminary routing assessments.
- 2.3.4 The port of entry for turbine blades has been confirmed as the Port of Kyle of Lochalsh, while Corpach Harbour would be used for tower sections and other large project components. The routing of these components to the site will include sections of the A87, A887, A830, and A82.

Site Access

- 2.3.5 Access on Site, for both AIL deliveries and construction vehicles, would be from the A887, turning right on the existing Millennium Wind Farm access junction and stone surface track. To accommodate AIL truck and oversail requirements, based on the candidate turbine and swept path analysis, resurfacing works might be required along the A887 and at the existing junction. An indicative site access arrangement plan, indicating required junction modification works, will be submitted with the s36 application for consent.

Turbine Layout, BESS and Associated Infrastructure Design Evolution

Design Layout A: Pre-application Consultation and Scoping Layout

- 2.3.6 This pre-application consultation and scoping layout was developed prior to any detailed site-specific surveys being completed. The layout was based on information available at the time, including buffer distances from existing wind turbines on Site, and known technical and design constraints. The layout comprised eight turbines of 200 m to tip height, which represented the maximum physical capacity of the turbine area from a wind resource perspective prior to the confirmation of detailed on-site constraints. Design Layout A was submitted as the 'Scoping Layout' with the Scoping Report for the Proposed Development in January 2024. It was also used for the formal pre-application consultation with the Council, SEPA and NatureScot in February 2024.

Design Layout B: Preliminary Layout

- 2.3.7 Following the formal pre-application consultation meeting with statutory consultees and receipt of a Scoping Opinion from the Energy Consents Unit, feedback and advice received on Design Layout A was taken into consideration by the Applicant and design team. Supplemented by a landscape and visual appraisal and informed by early results of on-site surveys, Design Layout B evolved to mitigate design considerations of concern and associated potential effects where practicable.
- 2.3.8 Proposed turbine locations were moved closer to the operational Millennium Wind Farm turbines and its existing access track, presenting a more compact scheme, and minimising the length of new tracks required to gain access to proposed new turbines.
- 2.3.9 An alternative position for T7 (T07A as shown in **Figure 4: B**) was considered at that stage and assessed towards potential impacts on views from key viewpoints, and other key environmental and design considerations, including presence of peat, priority habitats, hydrological features, and other constraints.

Design Layout C: Chilled Layout

- 2.3.10 This layout was informed by a detailed engineering appraisal, further results of additional on-site surveys (including phase 2 peat and habitat condition surveys), as well as further landscape and visual appraisal. Preliminary locations for temporary and permanent ancillary

infrastructure, including access tracks, crane hardstandings, substation, and BESS compound, were incorporated in Design Layout C.

- 2.3.11 Based on Design Layout B, the Chilled Layout adjusted turbine positions to avoid key environmental and design constraints, including areas containing pockets of peat of greater than 1.0 m deep (based on Phase 1 and Phase 2 peat probing survey data), waterbody and watercourse buffers, steep slope gradients, and areas requiring excessive cut and fill.
- 2.3.12 The Phase 2 peat surveys established that the alternative position of T7 (T07A as shown in **Figure 4: B**) would result in significant volumes of excavated peat. Therefore, the position of T7, as shown in **Figure 4: C**, was preferred.
- 2.3.13 The turbine layout remained at eight turbines; however, following a revised landscape and visual appraisal and wind resource assessment, the tip heights of five turbines were reduced to 180 m. Changes to tip heights were made following landscape and visual impact advice, focusing on the topography of the Site, and anticipated effects on key viewpoints in the vicinity of the Proposed Development.
- 2.3.14 A location suitable for the deployment of substation and BESS compounds was identified east of T2 (as shown in **Figure 4: C**), on an existing hardstanding to minimise ground disturbance. However, given this would ultimately be permanent infrastructure and more widely visible to the surrounding area, this location was discounted in favour of a location that would be less visually prominent.

Design Layout D: Final Layout

- 2.3.15 Design Layout D, as shown in **Figure 4: D** and **Figure 3**, represents the final stage of the design layout iterations, which includes the final placement of turbine locations, substation compound, BESS compound, siting and design of ancillary infrastructure, and biodiversity enhancement areas.
- 2.3.16 Based on Design Layout C, and following additional survey work, including Phase 2 peat probing (gap-fill exercise) and detailed habitat condition survey, turbine positions, crane hardstandings, connecting access tracks and ancillary infrastructure, were amended and/or re-positioned to ensure that Proposed Development components would avoid key environmental and design constraints as far as practicable.
- 2.3.17 Following a site visit and subsequent consultations with the estate's manager and foresters, the following biodiversity enhancement measures were identified to form part of the Proposed Development:
 - Native woodland planting;
 - Peatland restoration;
 - Riparian woodland planting; and
 - Treatment of bracken.
- 2.3.18 The identified biodiversity enhancement measures would benefit both, the estate and wider local environment. Additional details, in relation to the identified areas and measures will be

included in the outline Biodiversity Enhancement Management Plan that will be submitted with the s36 Application for consent.

- 2.3.19 Individual assessment chapters in the forthcoming EIA Report will provide more detailed commentary on design inputs and respond to specific matters relating to that particular technical topic, in particular pertaining to the scale of the proposed turbines and the landscape fit of the scheme.

Turbines

- 2.3.20 The turbine locations on Design Layout D (Final Layout) remain the same as in Design Layout C, albeit with minor adjustments to the turbine positioning and crane pad orientations which were introduced following the additional Phase 2 peat probing surveys, to ensure that proposed infrastructure avoids deep peat as much as possible. Despite the minor adjustments, the revised and final positioning of proposed turbines has remained in line with the design objectives and considerations.

Battery and Substation Compounds

- 2.3.21 The Battery and Substation Compounds were moved to the southern existing borrow pit, co-located with the borrow pit and required borrow pit extension, as shown in **Figure 3**. The new location was preferred, as the borrow pit edges would screen the substation and BESS from key viewpoints. This location would also ensure the use of existing infrastructure is maximised, while minimising ground disturbance.

Access Tracks, Turning Points and Junctions

- 2.3.22 The Final Layout facilitates the use of existing Millennium Wind Farm access track as far as practicable. New access track sections, turning points and junctions were re-designed to ensure that pockets of deep peat are avoided. Track sections that could not avoid areas of peat deeper than 1 m, due to design or other environmental constraints, would be floated. The sections proposed for floating track are shown in **Figure 3**.

Temporary Mobilisation Compound

- 2.3.23 A temporary mobilisation compound is proposed by the existing Millennium Wind Farm access junction, south of A887, as shown in **Figure 3**.

Temporary Construction Compounds

- 2.3.24 The main temporary construction compound was placed adjacent to the existing wind farm track, on an existing hardstanding east of T2, as shown in **Figure 3**. The western section of the compound encroaches a 50 m watercourse buffer, as shown in **Figure 5**. Nevertheless, no excavation would be required at this section of the hardstanding to deploy the construction compound. In addition, no other construction activities that could impact the hydrological features of the Site would take place at this section of the compound (e.g., refuelling, storage of fuels and oils, etc.). Appropriate commitments will be included in the Schedule of

Environmental Commitments of the EIA Report, so that the hydrological features of the Site are safeguarded during the construction stage of the Proposed Development.

- 2.3.25 Two additional smaller temporary construction compounds are proposed on existing infrastructure on Site; one within the first and northern existing borrow pit at National Grid Reference (NGR) E336476, N810467, and the second on the existing turbine hardstanding of an operational Millennium Wind Farm turbine, located at NGR E228635, N808348.

3 SCOPING AND CONSULTATION

3.1 Introduction

- 3.1.1 Consultation has been integral to the design progression of the Proposed Development, identification of existing environmental constraints and sensitivities and consideration of the likely environmental effects of the Proposed Development.
- 3.1.2 Consultation with statutory and non-statutory organisations and the public commenced in February 2024 and has taken several forms, including:
- stakeholder liaison;
 - public information events; and
 - informal discussions.
- 3.1.3 A tabulated summary of the responses provided by each statutory and non-statutory consultee and the Applicant's response to each issue is provided in **Appendix 2**.
- 3.1.4 In addition, EIA topic-specific consultation will also be summarised the relevant EIA chapters of the EIA Report accompanying the s36 application for consent.

3.2 Scoping Consultation

- 3.2.1 A pre-scoping meeting was held with the ECU in November 2023, and a pre-application meeting was held with The Council in February 2024. The pre-application advice report was received from The Council on 13th March 2024.
- 3.2.2 An EIA Scoping Request was submitted by the Applicant in January 2024. Following receipt of the Scoping Request, the ECU undertook consultation with statutory and non-statutory consultees and other environmental bodies with knowledge of the Site and surrounding areas, comprising:
- 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

3.2.3 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.

- 3.2.4 Copies of the EIA Scoping Report and ECU'S Scoping Opinion are available on the ECU portal².

Scope of the EIA

- 3.2.5 Scoping concluded that the following aspects were relevant for investigation in the EIA Report:

- Landscape and Visual;
- Ecology;
- Ornithology;
- Hydrology, Hydrogeology, Geology and Peat;
- Archaeology and Cultural Heritage;
- Traffic and Movement;
- Noise and Vibration;
- Aviation and Radar;
- Climate Change; and
- Shadow Flicker.

- 3.2.6 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)³. 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)⁴ would affect the Proposed Development:

² Available at: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00005013>

³ An EMP is a guidance document to measure and achieve compliance with the environmental protection and mitigation requirements of a project.

⁴ 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>

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.

3.2.7 The consultation process also concluded 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 will prepare a standalone planning statement to accompany the s36 application for the Proposed Development. It will also reference climate change legislation and objectives and the contribution of the Proposed Development to both UK and Scottish Government climate change targets.

3.3 Pre-application Consultation

3.3.1 Consultation with statutory consultees and other organisations will continue throughout the EIA process to obtain environmental information and develop appropriate environmental mitigation measures and habitat and biodiversity enhancement measures that are suitable for the Site. All pre-application consultation to date has been summarised in **Appendix 2**.

4 COMMUNITY ENGAGEMENT

- 4.1.1 The Applicant is aware of the value of engaging with and seeking to involve local communities in the Proposed Development, both prior to and following the submission of the application. While not a statutory requirement for s36 applications, the Applicant is committed to undertaking meaningful public consultation.

4.2 Public Consultation

- 4.2.1 The Applicant has undertaken a multifaceted public consultation approach to date, including two in-person public consultation events, -providing an up to date project website and posting cards out to addresses within 10 km of the Proposed Development to inform local residents of the public consultation events.
- 4.2.2 The Applicant hosted a first public consultation event in March 2024, and a second public consultation event in September 2024.

1st Public Consultation Event (March 2024)

- 4.2.3 The first public exhibition event was held at the following times and locations:
- 26th March 2024, Caledonian Canal Centre, Fort Augustus, 2 – 8pm.
 - 27th March 2024, Glenmoriston Millennium Hall, Invermoriston 1:30 – 7:30pm.
- 4.2.4 The consultation period was open until 3 May 2024 to allow for feedback, comments and questions to the project team and to give residents time to review the material and ask questions after the in-person event.
- 4.2.5 The consultation was publicised in various ways, including in the Inverness Courier, Lochaber Times and in the Press and Journal giving advance notice of the consultation event and contact details. Invite postcards were distributed to approximately 974 homes and businesses within 10 km of the Site Boundary, as shown in **Figure 2**, and included a summary of the project and the event details. Event invitations were issued to local Community Councils, councillors, MP and MSP.
- 4.2.6 At the public event, A1 boards containing project information were set up for public display. The boards included information about the project, the EIA process, environmental surveys and studies being undertaken, and community benefits including community ownership potential and development contributions. Visualisations and ZTV plans based on the Scoping Layout were also on display to give an impression of the proposed turbines from several key viewpoints.

2nd Public Consultation Event (September 2024)

- 4.2.7 The second public exhibition events were held at the following times and locations:
- 10th September 2024, Caledonian Canal Centre, Fort Augustus, 2 – 7:30pm.

- 11th September 2024, Glenmoriston Millennium Hall, Invermoriston, 11am – 3pm.
- 11th September 2024, Dalchreichart, Glenmoriston, 4:30 – 7:30pm.

- 4.2.8 As with the first public exhibition, an advert was placed in the Inverness Courier, Lochaber Times and in the Press and Journal. The events were also advertised via invitation postcards, and by contacting the local Community Councils, Councillors, MP and MSP in advance, in the same manner as undertaken for the first round of public exhibitions.
- 4.2.9 At the second public consultation event, banners containing updated project information were set up for public display. These included photomontage and wireline visualisations with the turbine locations, as shown in **Figure 3**. Attendees were given the opportunity to observe how the proposed turbines would appear from any specific point around the area, through location-specific wireline visualisations created live, by generating viewpoints through ReSoft Software.
- 4.2.10 This event informed the public and other interested parties of how the design of the Proposed Development has evolved and responded to emerging findings since the first public consultation event, explain the EIA process, and to ask for comment and feedback on the Proposed Development.
- 4.2.11 Public consultation material was made available on the project-specific website for online view and download.

4.3 Public Consultation Feedback

- 4.3.1 A Statement of Community Consultation (SoCC) will be submitted with the s36 application and will describe the consultation requirements for the Proposed Development, the consultation measures undertaken by the Applicant, the feedback received and any resultant modifications to the Proposed Development.

5 APPLICATION DETAILS

5.1 Project Description

5.1.1 The Final (Design Freeze) Layout is shown on **Figure 3**. The Proposed Development infrastructure would include:

- Eight wind turbines of approximately 6.6 MW each, five with a maximum tip height of up to 180 m and three with a maximum tip height of up to 200 m;
- Foundations supporting each wind turbine;
- BESS technology with a generating capacity of up to 20 MW;
- Onsite distribution sub-station and control building;
- Temporary mobilisation and construction compounds;
- A network of new on-site access tracks and associated watercourse crossings;
- A network of underground cables to connect turbines to a distribution substation;
- Borrow pit extension; and
- Habitat and biodiversity enhancement measures.

5.1.2 Grid references, maximum heights to tip, and ground-level AOD values for the proposed wind turbine locations are identified in **Table 5.1**.

Table 5.1: Proposed Turbine Locations

Turbine Number	Easting	Northing	Maximum tip height (m)	Ground Level AOD (m)
T1	227255	808475	180	645
T2	227860	808387	180	590
T3	228080	808985	180	592
T4	228643	808991	200	557
T5	229184	808831	200	538
T6	229866	808652	200	511
T7	230180	808302	180	510
T8	228619	809443	180	533

5.2 Next Steps

5.2.1 The Applicant intends to lodge the s36 application in quarter 2 of 2025.

5.2.2 The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (2017) inform the publicity of the EIA Report and includes requirements to:

- make EIA reports and associated documents physically available for inspection by the public at a named place; and

- provide hard copies of EIA reports and associated documents at the point of application relating to such applications to the Scottish Ministers (i.e. copies which would normally be provided on application to the ECU and the Scottish Government Library).
- 5.2.3 The provision of copies of the EIA Report available for public viewing will be confirmed with the ECU and the Council as part of the Gatecheck 2 process.
- 5.2.4 The s36 application for consent will be advertised in the Gazette, another national newspaper, and a local newspaper, with dates of publication to be confirmed.

6 REFERENCES

Scottish Government, 2022. Electricity Act 1989 - sections 36 and 37: applications guidance. Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/>

Scottish Government, 2017. The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. Available at: <https://www.legislation.gov.uk/ssi/2017/101/contents>

UK Government, 1989. Electricity Act 1989. Available at: <https://www.legislation.gov.uk/ukpga/1989/29/contents>

APPENDIX 1: REPORT FIGURES

Figure 1: Site Location

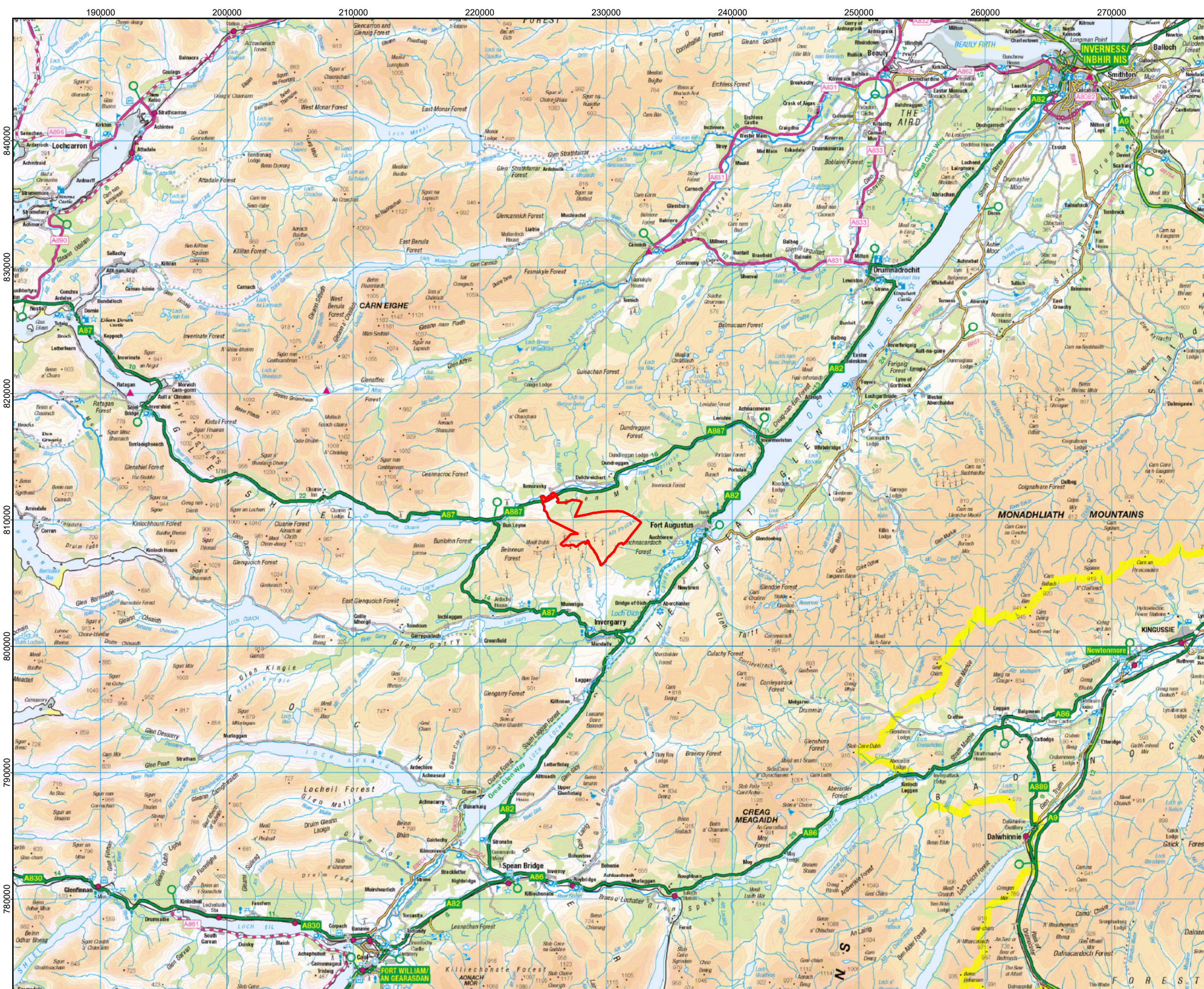
Figure 2: Site Boundary

Figure 3: Site Layout

Figure 4: Design Iterations

Figure 5: Site-specific Environmental and Design Constraints

Figure 1: Site Location



Legend:
 Application Boundary

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

00	04/02/2025	Location	DL	SA	JS
Rev	Date	Description	Drn	Chk	App

Millennium East Wind Farm

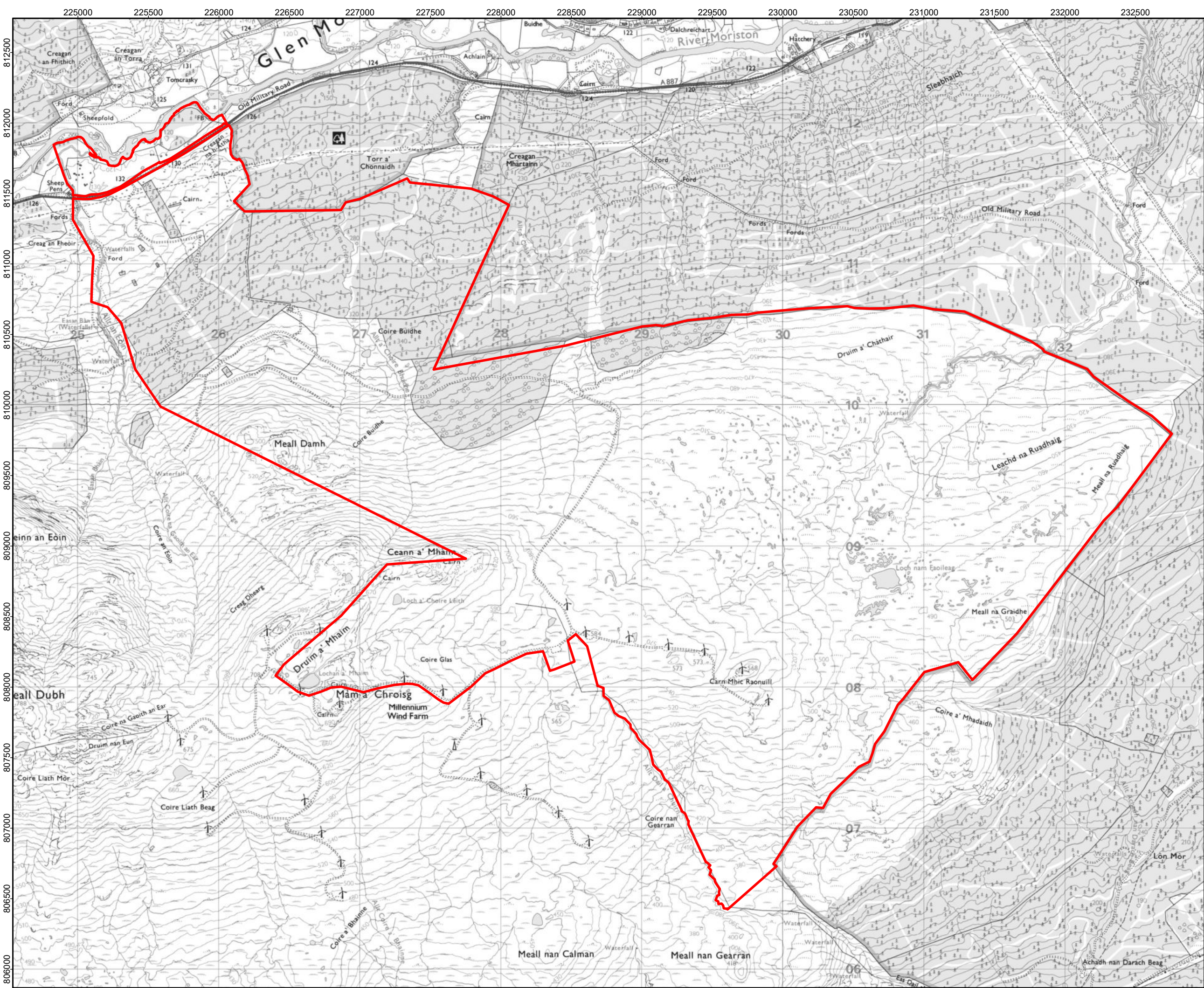
TITLE: Figure 1:
Site Location

ID:Site_Location

Scale: 1:280,000 @ A3

REV 00

Figure 2: Site Boundary



Legend:

Application Boundary

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

00	04/02/2025	RLB	DL	SA	JS
Rev	Date	Description	Drn	Chk	App

Millennium East Wind Farm

TITLE: Figure 2:
Site Boundary

ID:Site_Boundary

00.51

Kilometres

Scale: 1:25,000 @ A3

N

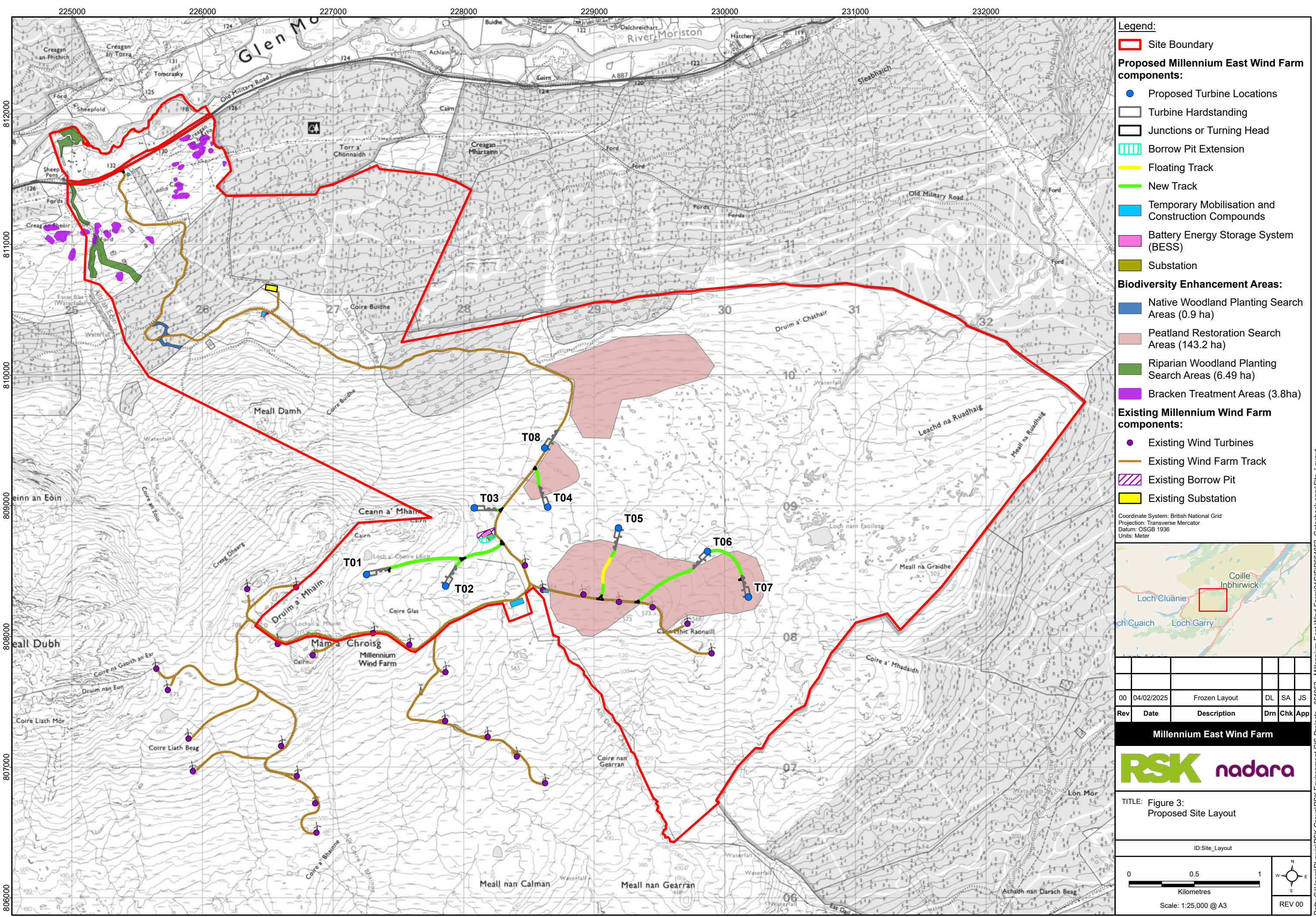
W

E

S

REV 00

Figure 3: Site Layout



- Legend:**
- Site Boundary
 - Proposed Turbine Locations
 - Turbine Hardstanding
 - Junctions or Turning Head
 - Borrow Pit Extension
 - Floating Track
 - New Track
 - Temporary Mobilisation and Construction Compounds
 - Battery Energy Storage System (BESS)
 - Substation
- Biodiversity Enhancement Areas:**
- Native Woodland Planting Search Areas (0.9 ha)
 - Peatland Restoration Search Areas (143.2 ha)
 - Riparian Woodland Planting Search Areas (6.49 ha)
 - Bracken Treatment Areas (3.8ha)
- Existing Millennium Wind Farm components:**
- Existing Wind Turbines
 - Existing Wind Farm Track
 - Existing Borrow Pit
 - Existing Substation

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter



00	04/02/2025	Frozen Layout	DL	SA	JS
Rev	Date	Description	Drn	Chk	App

Millennium East Wind Farm



TITLE: Figure 3:
Proposed Site Layout

ID:Site_Layout

00.51

Kilometres

Scale: 1:25,000 @ A3

N

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REV 00

Figure 4: Design Iterations

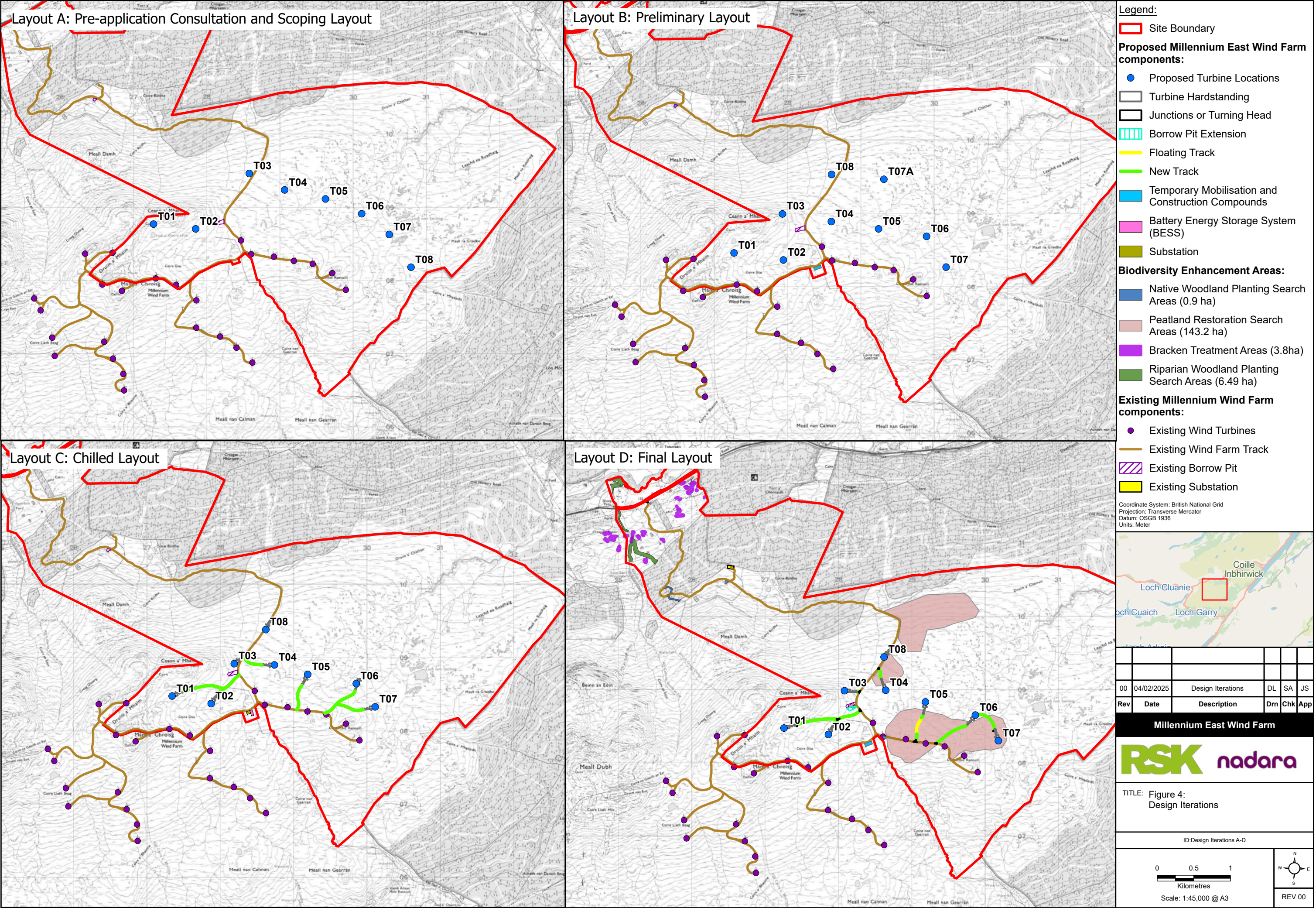
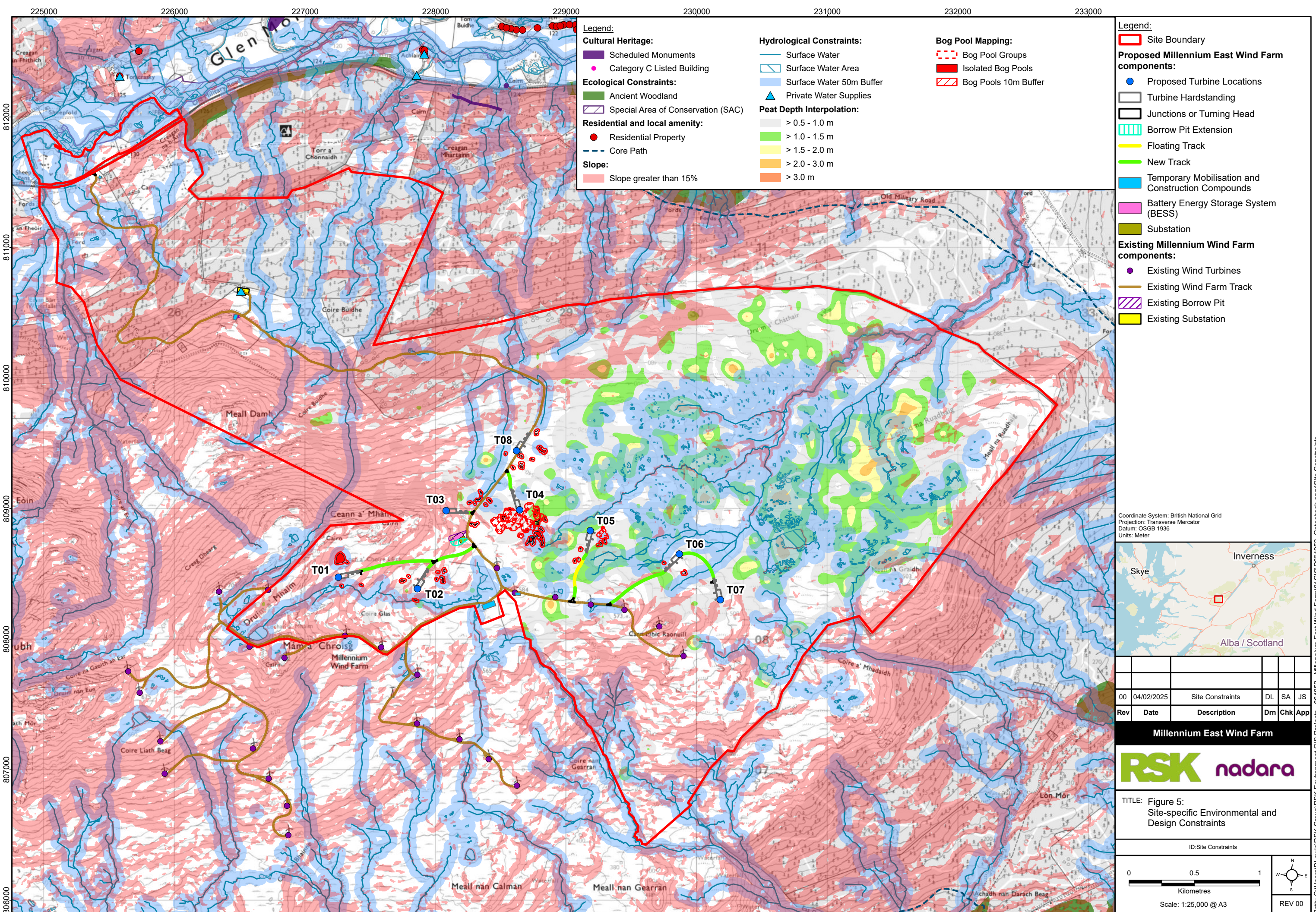


Figure 5: Site-specific Environmental and Design Constraints



Legend:
Cultural Heritage:

- Scheduled Monuments
- Category C Listed Building

Ecological Constraints:

- Ancient Woodland
- Special Area of Conservation (SAC)

Residential and local amenity:

- Residential Property
- Core Path

Slope:

- Slope greater than 15%

Hydrological Constraints:

- Surface Water
- Surface Water Area
- Surface Water 50m Buffer
- Private Water Supplies

Peat Depth Interpolation:

- > 0.5 - 1.0 m
- > 1.0 - 1.5 m
- > 1.5 - 2.0 m
- > 2.0 - 3.0 m
- > 3.0 m

Bog Pool Mapping:

- Bog Pool Groups
- Isolated Bog Pools
- Bog Pools 10m Buffer

Legend:

- Site Boundary

Proposed Millennium East Wind Farm components:

- Proposed Turbine Locations
- Turbine Hardstanding
- Junctions or Turning Head
- Borrow Pit Extension
- Floating Track
- New Track
- Temporary Mobilisation and Construction Compounds
- Battery Energy Storage System (BESS)
- Substation

Existing Millennium Wind Farm components:

- Existing Wind Turbines
- Existing Wind Farm Track
- Existing Borrow Pit
- Existing Substation

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

00	04/02/2025	Site Constraints	DL	SA	JS
Rev	Date	Description	Drn	Chk	App

Millennium East Wind Farm

TITLE: Figure 5:
Site-specific Environmental and
Design Constraints
ID: Site Constraints
0 0.5 1
Kilometres
Scale: 1:25,000 @ A3
REV 00

APPENDIX 2: CONSULTATION MATRIX

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
STATUTORY CONSULTEEs					
Energy Consents Unit (ECU)	Nicola Ferguson and Carolyne Paton	Nicola.Ferguson@gov.scot & Carolyne.Paton@gov.scot	Scoping opinion letter dated 11/04/2024	<u>Consultation</u> Unless stated to the contrary in this scoping opinion, the Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisor. With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 36 consent is submitted subsequent to this EIA scoping opinion. The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met. <u>The Scoping Opinion</u> The Scottish Ministers are satisfied with the scope of the EIA set out in the scoping report. The proposed development set out in the Scoping Report refers to wind turbines, and other technologies including battery storage. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to: - the scale of the development (dimensions of the wind turbines, solar panels, battery storage). - components required for each generating station. - minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage. <i>Scottish Water</i> The Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm the Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided. <i>Private Water Supply</i> The Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided. <i>Marine Directorate- Science Evidence Data</i> Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for onshore wind farm and overhead line development which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process. In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas. MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the	The EIA Report (EIAR) will include a full description of the Proposed Development. Scottish Water were contacted, but did not respond. The investigation is complete, and details to be included in the Hydrology, Hydrogeology, Geology and Peat chapter of the EIAR. The investigation is complete, and details to be included in the Hydrology, Hydrogeology, Geology and Peat chapter of the EIAR. Noted and will be considered in the Ecology chapter and the Hydrology, Hydrogeology, Geology and Peat chapter of the EIAR. Noted and will be considered in the Ecology chapter and the Hydrology, Hydrogeology, Geology and Peat chapter of the EIAR. The MD-SEDD checklist will be submitted to the ECU as part of the s36 application.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				process. Developers are required to submit the completed checklist in advance of their application submission. <i>Peat landslide hazard and risk assessment</i> The Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide the Scottish Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required. <i>Viewpoints</i> The scoping report identified viewpoints in Section 5 (table 5.5) to be assessed within the landscape and visual impact assessment. Additional viewpoints were suggested by Mountaineering Scotland. <i>Noise</i> The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 5.7 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA “A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise. <i>Aviation</i> As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 5.1 of the scoping report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects. <i>Ornithology</i> It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot. <i>Borrow pits</i> Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in ‘PAN 50: Controlling the Environmental Effects of Surface Mineral Workings’. <u>Mitigation measures</u> The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular	A Peat Landslide Hazard and Risk Assessment (PLHRA) will be submitted as part of the s36 application, with the details to be included in the Hydrology, Hydrogeology, Geology and Peat chapter of the EIAR. Following further consultation with the Council and NatureScot, the final and agreed viewpoints are presented in Appendix 3 of this report. Noted – will be fully considered in the Noise and Vibration Chapter of the EIAR. Via further consultation with the Civil Aviation Authority and relevant consultees, the Applicant was able to agree a reduced lighting scheme for the Proposed Development (4 turbines would be lit out of 8) Night-time Viewpoints have been agreed, and assessment is underway – please refer to Appendix 3 for details. Early consultations with NatureScot and relevant guidance have informed the scope of surveys and assessment process and relevant information will be provided within the Ornithology Chapter of the EIAR. Indicative borrow pit dimensions will be included in the Borrow Pit Assessment (BPA) that will be submitted in Volume 3 of the EIAR, as a Technical Appendix. As exact volumes of material available for borrow pit restoration are not confirmed prior the detailed design stage (post-consent), indicative BP restoration profiles will be incorporated in the BPA. Each technical chapter of the EIAR will include a summary of significant effects and mitigation measures.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts. <u>Conclusion</u> When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed. The EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes.	The EIA report will be formatted accordingly.
Energy Consents Unit (ECU)	Carolyn Paton	Carolyn.Paton@gov.scot	Correspondence dated 04/10/2024	<u>Amended approach towards assessing the Socio-economic Effects and Planning and Energy Policy</u> In relation to the proposed approach towards socioeconomics, requested the following revised approach: <i>‘Given that evidence indicates adverse significant effects are unlikely to occur from the proposed development (due to the nature of the operational site and extension works required), it is proposed that socioeconomics, tourism, recreation, and land-use issues are scoped out of the EIA. Instead, a Socio-Economic Statement (SES) that fully considers the anticipated effects of the proposed development, including employment generation and other economic effect, will be prepared and submitted alongside the planning application for consent.’</i> In relation to Planning and Energy Policy, the following revised approach was proposed: <i>‘A Planning Statement that fully considers the Proposed Development in the context of planning and other policy objectives will be prepared and form part of the planning application documentation. Therefore, we appreciate that a Planning and Energy Policy Chapter will not be required as part of the EIAR.’</i> The ECU accepted the proposed approach for Socio-economics and Planning by stating: <i>‘ECU are content with your proposed approach that socio-economics, tourism, recreation, and land-use issues can be scoped out of the EIA, on the basis that the evidence indicates significant effects are unlikely to occur from the proposed Development and instead a SES being submitted alongside the application. Also a Planning Statement that fully considers the proposed Development in the context of planning and other policy objectives being prepared and forming part of the planning application documentation.’</i>	A Socioeconomics Statement and a Planning Statement will be submitted with the s36 application for consent.
The Highland Council	Mark Fitzpatrick	Mark.Fitzpatrick@highland.gov.uk Direct Dial: 01955 608261	Scoping response letter dated 13/03/2024	<u>Description of Development</u> EIA must include: - a description of the physical characteristics of the whole development and the full land use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e., connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied; - a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; - the risk of accidents, having regard in particular to substances or technologies used; - an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and, - an estimated cumulative impact of the project with other consented or operational developments.	The EIAR will include a full description of the Proposed Development. Detailed road improvements or mitigation measures would only be confirmed post-consent via the trial-run and will subsequently form part of the full CTMP that will be subject to review and approval by relevant consultees including The Highland Council and Transport Scotland. A Design and Access Statement will be submitted with the s36 application for consent.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				<u>Alternatives</u> A statement is required that outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following: - the design chapter should clearly set out the design evolution of the scheme including constraints to the delivering of that scheme; - the range of technologies that may have been considered; - locational criteria and economic parameters used in the initial site selection; - options for access; - design and locational options for all elements of the proposed development (including grid connection); and - the environmental effects of the different options examined. The assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.	The EIA Report will include a full description of alternatives considered, and the design evolution. Grid connection works require consent under Section 37 of the Electricity Act 1989, and as such; the grid connection will be subject to a separate planning application process, should the Proposed Development be granted planning consent. To be addressed in the Climate Change Chapter of the EIAR Chapter and Carbon Calculator tool.
				<u>Environmental Elements Affected</u> The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area that you are encouraged to use your understanding of these in assessing your development and the potential for cumulative effects to arise. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded. <u>Land-Use and Policy</u> The current Development Plan comprises the: - Fourth National Planning Framework (NPF4) adopted in 2023 - Highland-wide Local Development Plan (HwLDP) adopted in 2012 - Inner Moray Firth Local Development Plan (IMFDLP) adopted 2015 & West Highlands and Islands Local Development Plan (WestPlan) adopted September 2019 – the application site spans both LDPs - Associated Supplementary Guidance (SG), with particular regard to the Onshore Wind Energy Supplementary Guidance (OWESG) (2016) and Part 2b (2017) This response does not attempt to detail all which may be relevant, as such, it is recommended that the applicant/agent reviews all these plans and documents prior to submission to establish the planning policy context for the EIA. The scope of the EIA should, however, address all the relevant issues covered within NPF4, HwLDP, IMFDLP, WestPlan, IMFpLDP2 and Highland Council Supplementary Guidance. The Council's Scoping response to this proposal along with our response request for major pre-application advice, which highlights the most salient parts of NPF4 and Local Development Plan and associated Supplementary Guidance documents. IMFDLP and WestPlan will have limited relevance to this proposal, as their focus is mainly on regional and settlement strategies as well as identifying specific site allocations. IMFDLP and WestPlan do however establish boundaries (including any refinements) of the Special Landscape Areas (SLAs) across the plan area. Community benefit being a goodwill contribution voluntarily donated by a developer for the benefit of communities affected by developments where the development will have a longterm impact on local resources and the local environment. Whilst Community Benefit is a separate issue to planning, the Council wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. The Council's Community Benefit policy contains contacts for any further discussion on this and the Council would advocate early engagement. <u>Sustainability:</u>	To be addressed in the EIAR and supporting documentation included as part of the s36 application for consent. To be addressed in the Planning Statement that will be included as part of the s36 application for consent. To be addressed in the Socioeconomic Statement included as part of the s36 application for consent.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials, and minimising environmental impacts of development. A Sustainable Design Statement is required. Wind farms produce a sustainable form of energy; however, the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development in its entirety is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of sustainable development are fully assessed in the information which supports the application. The wind farm needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer needs to consider the impact of the installation and the prospective long-term use of the energy to accommodate the requirements of a decarbonised energy provision for Scotland and the Highlands. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies. <u>Landscape and Visual Impact Assessment</u> The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purpose of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35 mm format full frame sensor camera – not an 'equivalent'. The focal lengths required are 50 mm and 75 mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape; i.e., a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards and are subject an independent verification check upon receipt: https://www.highland.gov.uk/downloads/file/12880/visualisations_standard_for_wind_energy_developments All elements of a development are important to consider within any EIAR, including the visual impact of the tracks, substations, battery energy storage and on-sie borrow pits etc. Therefore, the assessment should include the expected impact of these elements, which should have their own site layout and elevation plans, notwithstanding that the principal structures will be a primary concern. All elements of the proposal are to be rendered into photomontages. There are a number of similar applications in this area that are yet to be determined / concluded in the vicinity of this application, many of these have been identified in the scoping report, which may or may not help clarify the weight towards particular policy elements in the final planning balance. Our interactive Wind Turbine map is up to date as of 01 January 2024 and can be accessed on the link below: http://highland.gov.uk/windmap The Energy Consents Unit may also be able to provide details of any other known nearby proposals that may be at Scoping Stage as these may have advanced at the same pace as your proposal. The finalised list of Viewpoints (VP) and wireframes for the assessment of effects of a proposed development must be agreed in advance of preparation of any visual with THC and NatureScot.	A Design and Access Statement will be included as part of the s36 application for consent. Compliant visualisations will be provided in Volume 2c of the EIAR. Likely effects from all elements of the Proposed Development, including borrow pits and access roads, will be included within Landscape and Visual Impact Assessment of the EIAR. The Council's Wind Turbine Map⁵ will be referred to when determining schemes for inclusion in the cumulative assessment. The updated cumulative baseline for the LVIA assessment is listed in Appendix 4. The final turbine locations (design freeze) of Beinneun 2, which is still at Scoping, were received from the Applicant for the Bennuin 2 scheme to be incorporated in the cumulative baseline and visualisations. Agreed via further correspondence between the Applicant, NatureScot and The Council.

⁵ Available in: https://www.highland.gov.uk/info/198/planning_-_long_term_and_area_policies/152/renewable_energy/4

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				We acknowledge that there will be some micro siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and who the receptors are when they are taking the photos it would be helpful. We have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography. Furthermore, the LVIA Chapter of the EIAR should clearly set out the methodology, including: - Definitions of each point on the scale of magnitude of change which is used by the applicant in reaching a conclusion on the magnitude of change. - Definitions of each point on the scale of sensitivity of receptor which is used by the applicant in reaching a conclusion on the sensitivity of receptor. - The threshold to which the applicant considers a significant effect is reached. For the avoidance of doubt the Council consider that Moderate impacts can be significant, and it is recommended that the EAIR takes this approach as well; We expect the Landscape Impact Assessment to refer to the Council's Onshore Wind Energy Supplementary Guidance and expect an assessment of the proposal against the criterion set out in the Council's OWESG at pages 19 and 20 to be included within the LVIA chapter of the EIAR. The Site is located within the Loch Ness Landscape Character Areas Study, being part of the Highland Strategic Capacity content of the suite: "Onshore Wind Energy Supplementary Guidance, November 2016 (with addendum, December 2017). We expect an assessment on the impact on all potentially effected WLAs to be included within the EIAR given the proximity to a number of WLAs and the theoretical visibility of the scheme from within WLAs. NatureScot will provide further assessment advice on WLAs. Gardens and Designed landscapes (GDL) are considered as assets due to their design and relationship to the wider landscape in addition to their historic nature. Therefore, it would be appropriate for any aspects relating to landscape setting, or relationship to the wider landscape to be considered in the LVIA chapter, if necessary in addition to appearing in the Cultural Heritage Chapter. The residential visual amenity impact should be assessed for all properties, settlements, housing groups within 2 km of the turbines within the LVIA. <u>Cultural Heritage</u> The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify: - The architectural heritage (Conservation Areas, Listed Buildings); - the archaeological heritage (Scheduled Monuments); - the landscape (including designations such as National Parks, National Scenic Areas, Special Landscape Areas, Gardens and Designated landscapes and general setting of the development; and - the inter-relationship between the above factors. We would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. Where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings should be provided. Visualisations illustrating both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.	Viewpoints have been micro-sited to avoid nearby screening features where possible. Prior to undertaking the photography the viewpoints have been identified as representative or specific and confirmed on site. Wirelines have been taken to the viewpoints to aid orientation and 360 degrees of photography taken at each viewpoint. The methodology will be explained in detail in a Technical Appendix. Judgements on magnitude, sensitivity and significance will be described clearly in the main LVIA text. An evaluation of the Proposed Development against OWESG criteria will be included in the LVIA Chapter of the EIAR. NatureScot has advised that a detailed assessment of impacts on WLA will not be required. The qualities of WLA will be considered in the assessment of impacts on landscape character. Where relevant the contribution of GDL to landscape character and sensitivity will be evaluated in the LVIA Chapter. There are no residential properties within 2km of the nearest proposed turbines. Cultural Heritage Scoping responses and subsequent consultations with the Council and Historic Environment Scotland will be considered in full in the Cultural Heritage chapter of the EIAR.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				Historic Environment Scotland (HES) are anticipated to provide comment on the assessment methodology for heritage assets within their remit including the scope of the assessment and their requirements for supporting information (including visualisations) and the potential impacts on heritage assets in their consultation response. THC's Historic Environment Team is generally satisfied that the information present in the Scoping Report will adequately address an impact assessment for the proposal. However, our Archaeologists note that there are two areas of cairns recorded on the HER, rather than the single noted in para 5.5.16. Upstanding remains should be identified by survey and the potential for buried features or deposits to be present should be stated in the report. The proposed assessment methodology, including proposed study areas, is acceptable and will allow an assessment of the predicted impacts to be made. The scoped-out effects presented in paras 5.5.46-48 are reasonable. Where impacts are unavoidable, HET expects methods to mitigate this impact to be discussed in detail. <u>Geology, Hydrology and Hydrogeology (Water Environment)</u> The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on the water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. The Council's Flood Risk Management Team had no comments to make at this stage. However, there are a number of watercourses and waterbodies on the site therefore the following applies: • A minimum of a 50 m buffer of all watercourses / bodies and turbines / crane hard-standings, which should be shown on a suitably scaled drawing. • All tracks should be kept a minimum of 10 m away from any waterbody except water crossings; • Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; • Natural flood management techniques should be applied to reduce the rate of runoff where possible, use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; • Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change; • Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and, • The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment SG. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	The EIAR chapter is supported with a comprehensive Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (Volume 3 Technical Appendix 9.1). This includes an up-to-date HER search which identifies both heritage assets mentioned in the scoping report (MHG53256 & MHG53757), as well as seven further known heritage assets. Water Environment and other relevant consultee scoping responses will be considered in the Geology, Hydrology and Peat Chapter of the EIAR. Aquatic fauna will be considered in the Ecology Chapter of the EIAR. Will be considered in the Hydrology, Hydrogeology, Geology and Peat Chapter of the EIAR.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies but it is not definitive. An on-site survey will be required. <u>Ecology</u> The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc.) interest on site. It needs to be categorically established what species are present on the site, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programmes (such as native- tree planting, stock exclusion, etc.) for the proposed site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans. The developer should undertake a specific peat assessment to inform the siting, design, or other mitigation in order to overcome significant effects on peatland and Carbon Rich Soils, Deep Peat, and Priority Peatland Habitat (CPP). Attention is drawn to paragraph 4.34 on page 24 of the OWESG, which discusses peat and CPP. We also expect an up to-date National vegetation Classification (NVC) survey and a commitment to undertake peatland restoration on an area of increased size to that of the application site. The Environmental Impact Assessment Report (EIAR) should provide details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site. The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. NatureScot can also provide specific advice in respect of the designated site boundaries for SACs and SPAs and on protected species and habitats within those sites. The potential impact of the development proposals on other designated areas such as SSSI's should be carefully and thoroughly considered and, where possible, appropriate mitigation measures outlined in the EIAR. NatureScot provide advice on the impact on designated sites. If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests. The EIAR needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant. The EIAR should include a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers, these habitats are easily damaged by insensitive drainage. NPF4's commitment to deliver positive effects for biodiversity through development. Policy 3 states that, 'Development proposals for national, major and of EIA development should only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.' A draft or outline Habitat Management Plan (HMP) and Species Protection Plan (SPP) should be produced as part of the EIA, including any proposals for mitigation and enhancement in relation to important habitats and species. Any	A hydrology site survey has been undertaken and details of private water supplies will be included in the Hydrology, Hydrogeology, Geology and Peat Chapter of the EIAR. Ecology and ornithology surveys carried out to inform the EIA baseline, including survey methods and results, will be detailed in the Ecology and Ornithology chapters of the EIAR and associated technical appendices. An Outline Biodiversity Enhancement Management Plan (OBEMP) detailing proposed habitat enhancement and mitigation measures and making reference to relevant Biodiversity Action Plans as appropriate will be provided as a technical appendix to the Ecology Chapter. Designated sites with relevant qualifying features will be considered in the Ecology and Ornithology chapters of the EIAR. A deer assessment and accompanying technical appendix will be included in the EIAR. Aquatic interests and associated consultation will be discussed as appropriate in the Ecology Chapter of the EIAR, in the context of the application of embedded and tertiary mitigation, in accordance with the principles of proportionate EIA. GWDTE will be considered in the Hydrology, Hydrogeology, Geology and Peat Chapter of the EIAR NPF4 Policy 3b will be considered throughout the assessment process and referenced where relevant in the Ecology and Ornithology EIAR chapters. The assessment of effects will include calculations of predicted direct and indirect habitat losses and impacts to important ecological and ornithological features including relevant protected species and

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				compensatory planting plans should be carefully considered and included in the HMP. The HMP should include a comprehensive monitoring programme for all habitat improvements, and breeding birds on the site. Remote sensing using radar or infra-red cameras should be considered, to help inform future development and decision making within the industry with regards to eagles. Lastly, the HMP (or other document) should also include a protocol for reporting collisions to NatureScot. <u>Ornithology</u> The presence of Schedule 1 Birds and qualifying interests of Special Protected Areas and other areas designated for aviary interests must be included and considered as part of the planning application process; not as an issue that can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to any comments from NatureScot and RSPB in this respect. An assessment of the impacts to birds through collision, disturbance, and displacement from foraging / breeding roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters. <u>Noise</u> <i>Operational Noise</i> The applicant must submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 “The Assessment and Rating of Noise from Wind Farms” and the associated Good Practice Guide published by the Institute of Acoustics. The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10 m/s or a composite standard of 35 dB LA90(daytime) and 38dB LA90 (nighttime) or up to 5 dB above background noise levels at up to 12 m/s. The nighttime lower limit of 43 dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development. <i>Cumulative Noise</i> The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted and consented levels from such developments. The good practice guide offers guidance on how to deal with cumulative issues. Where existing development has consented limits higher than suggested above, the applicant should agree appropriate limits with the Council’s Environmental Health Officer. The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement	designations, and will outline SPPs to prevent breaches of legislation pertaining to protected species. Any proposals for mitigation, compensation and enhancement, as appropriate, will be set out in the chapters and the OBEMP to be included as a Technical Appendix. The presence of and assessment of impacts to important ornithological features, including Schedule 1 Birds and SPAs and other areas designated for ornithological interests, will be included in the Ornithology Chapter of the EIAR. Survey methods, results, and any limitations to assessment will be detailed in the chapter and associated technical appendices. Appropriate mitigation and enhancement commitments will be included in an Outline Biodiversity Enhancement Management Plan (OBEMP) that will be submitted with the s36 application for consent. Ornithology Scoping responses will be considered in full in the Ornithology Chapter of the EIAR. Noise Scoping responses will be considered in full in the Noise and Vibration Chapter of the EIAR.

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				relaxation is being claimed. The assessment should also include a table of figures which includes the following: • The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12 m/s. • The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear. • The predicted levels from each existing or consented wind farm development at each NSL. • The cumulative levels based on consented and predicted levels at each NSL. The assessment should also include a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels. <i>Noise Exposure</i> When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite. <i>Background Noise Measurements</i> If background noise surveys are required, these should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer. Where a monitoring location is to be used as a proxy location for another property, particular care must be taken to ensure it is not affected by other noise sources such as boiler flues, wind chimes, etc. which are not present at that other property. Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys. It is recommended that the developer's noise consultant liaises with Environmental Health at an early stage to discuss any issues regarding the proposed methodology. <i>Construction Noise</i> Given the location, construction noise at the turbine sites is unlikely to be an issue at any noise sensitive properties, however, consideration will be needed to be given construction traffic. Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. Generally, people are tolerant of construction noise during typical working hours which are taken to be 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be carried out out-with these times. Regardless of whether a construction noise assessment is required, it is expected that the developer / contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented. Particular attention should be given to the use of tonal reversing alarms and ground compaction plant which are often the most intrusive noise generating elements of a large construction project. <i>Substations and Battery Energy Storage Systems</i>	

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				If the application includes a proposal for a sub-station or battery storage site, a separate noise assessment may be required to demonstrate that noise will meet the following standards: - Noise arising from within the operational land of the sub-station, when measured and/or calculated as an LZeq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at noise sensitive premises - The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated within the operational land of the sub-station, must not exceed the current background noise levels at noise sensitive premises. The Rating Level should be calculated in accordance with BS 4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound. <u>Traffic and Transport</u> A Transport Assessment (TA), Construction Traffic Management Plan (CTMP) and an Abnormal Load Assessment will be required within the EIAR. The Transport Assessment Methodology below sets out what the council requires, and further information is provided in our published Roads and Transport Guidelines for New Developments. When establishing a scope for the assessment consideration should be given to the use of the public roads in this area can be influences significantly by tourist traffic. Transport Planning would expect a Transport Assessment to be submitted with any future planning application and a High National Traffic Forecast be applied. The information below is not exhaustive and should be used as a guide to submitting all relevant information in relation to roads, traffic and transportation matters arising from the development proposals. - Identify all public roads affected by the development. In addition to transportation of all abnormal loads & vehicles (delivery of components) this should also include routes to be used by local suppliers and staff. It is expected that the developer submits a preferred access route for the development. All other access route options should be provided, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process to arrive at a preferred route. - Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following: - assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required; - road surface condition and profile; - assessment of structures and any weight restrictions; - road widths, vertical and horizontal alignment and provision of passing places; and - details of adjacent communities. Details of any new site access should be clearly set out on dimensioned drawings related to OS data and include confirmation of geometry, construction form, drainage details to prevent water running out onto the public road and evidence that appropriate visibility splays can be achieved. Vehicle swept paths should also be provided to evidence that the proposed junction form will be suitable for its intended use. Details of reinstatement of any temporary site access at its junction with the public road, post construction is also required. Appropriate junction arrangements and visibility splay information can be found in THC's published Roads and Transport Guidelines for New Developments.	The Traffic and Transport Scoping response will be considered in full in the relevant Chapter of the EIAR. The Abnormal Load Route Assessment that will accompany the planning application will indicate areas along the proposed delivery route that may require road improvements or mitigation measures, including that of landtake to road verges, removal and replacement of any street furniture and consideration of works that may be required to bridge crossings for example. However, at this stage this information will be preliminary as it is expected that any measures would be identified through further detailed design and confirmed once a test/trial run has been undertaken at the exact locations identified. Preliminary information on mitigation and actions to be taken will be included an outline CTMP that will be submitted with the planning application. Nevertheless, detailed road improvements or mitigation measures would only be confirmed post-consent via the trial-run and will subsequently form part of the full CTMP that will be subject to review and approval by relevant consultees including The Highland Council and Transport Scotland. An indicative existing junction modification plan, including anticipated bellmouth extension works to accommodate the delivery of turbine blades, will be submitted with the s36 application for consent.

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				<u>Socio-Economic, Tourism and Recreation</u> We consider that Socio-Economic, Tourism and Recreational impacts should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy. <u>Public Access</u> The potential impact on and mitigation for public access should be assessed incorporating core paths, public rights of way, long distance routes, other paths and wider access rights across the site. Those impacts, along with mitigation measures, will inform an Access Management Plan which is required to be submitted as part of the EIAR and an assessment of the developer's impact on public access included within this Socio-Economic section of the EIAR as per the requirements of HwLDP Policy 77 Outdoor Access. As a point to note, any retained or planned gates should have a pass gate installed by them to accommodate walkers, cyclists and horse riders with an internal width of at least 1.5m – kissing gates are unacceptable. <u>Aviation, Radar and Telecoms</u> When the applicant is submitting a future application, they will need to demonstrate what interests they have identified and the outcomes of any consultation with relevant authority's such as Ofcom, NATS, BAA, CAA, MOD Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. There should be continued dialogue with HIAL over the impact on the radar at airports in the area. <u>Miscellaneous: Health and Safety and Shadow Flicker</u> The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting rainfall, unlight, prevailing wind direction etc. The expected impacts of issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can be highlighted. Consideration must also be given to the potential health	In agreement with the ECU, Socio-Economic, Recreation and Tourism have been scoped out of the EIAR. However, Socioeconomic effects will be considered in a Socio-Economic Statement (SES) to accompany the s36 application. No forestry felling is currently anticipated. This will be confirmed in the EIAR and an appropriate level of information included therein. Potential impacts will be addressed in the Design and Access Statement that will be submitted with the s36 application for consent. An Access Management Plan (AMP) that accords with NPF4 Policies 11 (Energy), 20 (Blue and Green Infrastructure), and HwLDP Policy 77 for Outdoor Access, will be prepared following the completion of the detailed design (post-consent). It is anticipated that the AMP would be required from an appropriately worded planning condition on a prospective planning consent. The AMP will be subject to review and approval from key stakeholders, including THC's Access Officer and Local Community Councils, and will be implemented in advance of construction commencing. Telecommunications have been scoped out via the Scoping Exercise (Preliminary Impact Assessment and Consultation) and subsequent Scoping Report. Relevant consultees will be consulted at Gatecheck and Planning Application submission to re-evaluate Final Layout (Design Freeze). Ongoing consultations with relevant consultees are in progress. To be fully considered and addressed in the Aviation Chapter of the EIAR. Topics will be addressed in the relevant Chapters of the EIAR.

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				and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the site. The assessment should address impact during each phase of the development. A number of aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application. Given the reported separation distance from any nearby residential properties, it is accepted that a shadow flicker assessment is not required to be undertaken. <u>Forestry</u> As it stands, a specific chapter on Forestry would not be required. However, if there is any change to the layout of the access road, turbine or associated ancillary infrastructure that may impact on woodland then a Forestry chapter will be required. The EIAR should indicate areas of woodland / forestry plantation which may be felled to accommodate new development (including the access), including any off-site works / mitigation. Compensatory planting of new woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. <u>Significant Effects on the Environment</u> Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, positive and temporary, positive and negative effects of the development. Positive and negative effects must be measured using a four-point scale: strong positive, positive, negative, strong negative. <u>Mitigation</u> The EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation.	An outline Construction Environmental Management Plan (CEMP) will be provided as an appendix to the EIAR. Before the end of the operational period of the Proposed Development, a Decommissioning and Reinstatement Plan would be established and agreed with relevant authorities prior to commencement of decommissioning activities. These activities would comply with policies and follow guidance available at the time. To be considered/confirmed in the Shadow Flicker Chapter of the EIAR. Noted – to be address in the introductory chapters of the EIAR. Noted. A summary of committed mitigation will be provided in the Environmental Commitments Appendix of the of the EIAR.
The Highland Council	Mark Fitzpatrick	Mark.Fitzpatrick@highland.gov.uk Direct Dial: 01955 608261	Email response to request to agree final viewpoint list for the LVIA 19/06/2024	The Highland Council's landscape adviser, Anne Cowling, added an additional viewpoint in Glen Moriston at a lay-by opposite the existing site entrance to operational Millennium wind farm. This would be representative of views from the A887: "...although there are roadside trees in this area, they are mostly birch and don't necessarily block the view much during late Autumn through to Spring. It would be useful to have at least a wireline from an appropriate location in this vicinity to aid understanding of visibility from this key route throughout the year."	A photomontage will be prepared from the requested location. In addition a series of wirelines from points along the A887 coinciding with the bare Earth tip ZTV will be provided to show sequential visibility along the A887.
Historic Environment Scotland (HES)	Kevin Mooney	kevin.mooney@hes.scot	Case ID 300070840 Scoping Response letter dated 04/03/2024 / Visualisations	<u>Scope of Assessment</u> We welcome that the potential cultural heritage effects are scoped into the assessment within the scoping report in Chapter 5.5 and are broadly content with the proposed study areas proposed by the applicant. We can confirm that there are no World Heritage Sites, scheduled monuments, category A listed buildings, inventory battlefields, or inventory garden and designed landscapes within the proposed development boundary.	HES was consulted on the heritage assets proposed for detailed assessment in the EIAR through submission of Volume 3 Technical Appendix 9.1: Cultural Heritage Baseline Desk-based Assessment and Stage 1 Setting Assessment (23 October 2024) in which only

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			Consultation dated 27 November 2024 / Consultation regarding SM11484 19 December 2024	Careful consideration should be given to reducing and avoiding impacts on the setting of heritage assets during the design process. There are a number of heritage assets within our remit whose settings have the potential to be adversely impacted by the current proposals. This list should not be treated as exhaustive and is only intended as a reference: - Fort Augustus-Bernera military road, 1890m W of Ceannacroc Lodge (SM11484) - Dundreggan Farm, motte 35m SW of (SM11875) The Zone of Theoretical Visibility (ZTV) suggests all turbines would be at least partly visible from these assets. No visualisations have been provided for any of these assets; however, the ZTV, in combination with the supplied LVIA wireframes, suggests the impact on the setting of these assets would be relative minor. Parts of turbines may appear in the distance on the skyline, particularly from stretches of the Fort Augustus Bernera military road. However, the turbines would not be in any key views for either monument, and would be at such a distance that the integrity of setting for each asset would not be affected. The applicant states that assets to be included within the EIA assessment will be agreed with consultees after their “Stage 1 Setting Assessment”. We welcome that this assessment will follow the three stage approach within our Managing Change in the Historic Environment: Setting guidance (paragraph 5.5.28). We note that viewpoints are discussed (paragraph 5.5.30), however this text is unclear and may be a repeat of text elsewhere in the document. We note clarification (paragraph 5.5.33) that visualisations will be agreed in advance with HES for inclusion within the EIA report. The applicant proposes to scope out detailed assessment of listed buildings within towns and villages (paragraph 5.5.47) which includes Fort Augustus Abbey, Monastery and School (LB1861) and Fort Augustus Abbey Church (LB1862). We are content that these assets can be scoped out in this instance, following our own initial appraisal, as there are unlikely to be significant impacts on the setting of these assets. We do however disagree with the applicants reasoning that the proposed development ‘would not appreciably alter the features of their settings that contribute to their cultural significance’(paragraph 5.5.47). <u>Further Information</u> Guidance about national policy can be found in our ‘Managing Change in the Historic Environment’ series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at https://www.engineshed.scot/.	Scheduled Monument SM794 Torr Dhuin, fort, Fort Augustus was proposed for detailed assessment in this chapter. They were also consulted regarding the suitability of proposals for supporting visualisations. HES confirmed they are content that the following assets can be scoped out of further detailed assessment: - Tir nan Og, cairn 445m SSW of (SM1149) - Torgyle Bridge (LB14996) - Fort Augustus Monastery, Abbey and School (LB1861) - Fort Augustus Abbey Church (LB1862) - Dundreggan Farm, motte 35m SW of (SM11875) Clarification was sought in relation to SM11484 Fort Augustus-Bernera Military Road, 1890m W of Ceannacroc Lodge. Sequential wirelines and draft photomontages were provided to HES to support their response. HES confirmed that detailed assessment of SM11484 is required in the EIA, to be supported with a set of sequential visualisations. See Part 9.6 of the Cultural Heritage chapter for detailed assessment of SM11484; supporting visualisations are provided at Volume 2b: LVIA Viewpoints 12 & 17 and Volume 2d: CHVP03 Figure 9.5.
NatureScot		The Links, Golspie Business Park, Golspie KW10 6UB NatureScot Tel: 01463 701608	Scoping response dated letter 05/03/2024	<u>General Concerns</u> - The proposed development is located adjacent to Beinneun and Millenium Wind Farms. In addition to the data associated with these earlier proposals, consultation responses and correspondence relating to other recent applications in the surrounding area may provide useful background information to the applicants. <u>Key Issues</u> - Potential impacts to European sites including the River Moriston Special Area of Conservation and the West Inverness-shire Lochs Special Protection Area. - Impacts to priority peatland and blanket bog. - Potential for impacts, including cumulative impacts, to wider countryside birds such as golden eagle and upland waders. The assessment of these issues and the resultant impacts will determine our position on any application which comes forward. Any substantial changes to the proposal, such as a significant increase in turbine numbers, we may wish to revisit this position.	To be addressed in the relevant Chapters and Technical Appendices of the EIAR.

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				<u>Protected Areas</u> Further information on the protected areas below can be found on SiteLink at: https://sitelink.nature.scot/home. Based on the initial information provided in the scoping report it seems unlikely that this proposal would affect any other protected areas, but we would expect the EIAR to demonstrate this. <i>European sites</i> The status of the following sites mean that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Further information on the legislative requirements of European sites can be found at: https://www.nature.scot/doc/legislative-requirements-european-sites. A Habitats Regulations Appraisal (HRA) would be required to assess potential impacts to these sites, and any future application would need to demonstrate there was no adverse impact on site integrity. <i>River Moriston Special Area of Conservation (SAC)</i> We are pleased to note that fish habitat surveys have been carried out, and recommend that these also cover the site access and any modifications to the site boundary. We recommend that the need for a freshwater pearl mussel survey is also considered, and that survey and assessment for salmon and freshwater pearl mussels follow the guidance at "NatureScot pre-application guidance for onshore wind farms" (see above link). We note that the Ness District Salmon Fishery Board will be consulted and recommend the applicants request any relevant desk study information they may hold, in addition to seeking comments on the proposed scope of survey and assessment. Both salmon and freshwater pearl mussels are highly sensitive to adverse changes in water quality. Any future application should clearly demonstrate how water quality within the SAC and its tributaries would be protected during the construction, operation and decommissioning of the wind farm, including any proposed habitat management works. particular attention to the period during and immediately after construction. Advice on Good practice during Wind Farm construction can be found at: https://www.nature.scot/doc/guidance-good-practiceduring-wind-farm-construction. <i>West Inverness-shire Lochs Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI)</i> The proposed wind farm is close to the SPA which is protected for breeding common scoter and blackthroated divers. We recommend that assessment of impacts to this SPA is scoped in. There is potential for significant cumulative impacts from this proposal in combination with other developments in proximity to this SPA. We would therefore require all potential impacts to be fully assessed. Based on the current site boundary and access proposals there is unlikely to be disturbance to birds breeding within the SPA. In terms of disturbance and displacement, survey and assessment should therefore focus on the potential for both species to use waterbodies outside the SPA and closer to the wind farm. The EIAR should include full details of waterbody surveys within the proposed development site and a 1km buffer, including an assessment of their suitability for both species. A comprehensive desk study should also be included. We recommend the applicants request any scoter and diver records (for birds using waterbodies close to the wind farm as well as records from within the SPA) by contacting Alison MacLennan at the RSPB (Alison.MacLennan@rspb.org.uk). Results from previous proposals in this area should also be reviewed where available. An assessment of collision risk will also be required. For divers methods should follow our bird survey guidance. For scoters we recommend a theoretical assessment of the potential flight lines used by scoters if they were to move between the SPA lochs (and any other lochs or lochans they may use),	To be addressed in the relevant Chapters and Technical Appendices of the EIAR Information to inform Habitat Regulations Appraisal (HRA) will be provided for relevant European sites as identified below. To be addressed in the relevant Chapters (Ecology and Hydrology, Hydrogeology, Geology and Peat) and Technical Appendices of the EIAR. Consideration of the West Inverness-shire Lochs SPA and SSSI, including desk study and review of appropriate available data sources, will be included in the Ornithology Chapter and Technical Appendices of the EIAR.

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				and into and out of the SPA at the start and end of the breeding season; and the potential for these to cross the proposed turbine array. This assessment should include an updated review of desk study information (see above) and consideration of the surrounding topography. We recommend this assessment is supplemented by current expert opinion from scientists with a knowledge of common scoter breeding ecology on the probable flight lines of, and collision risk to, common scoters. The applicants are welcome to contact us directly to discuss the scope of survey and assessment further We note that the future grid connection would be the subject of a separate application. At this stage we wish to highlight the potential proximity to West Inverness-shire Lochs SPA (including Loch Lundie) and the need for any overhead line connection to consider the potential for collision risk, including cumulative impacts with other proposals in this area. <u>Habitats</u> We advise that habitat surveys are undertaken across the whole development site to assess impacts from the development, to help inform potential redesign or micro-siting, and to identify potential areas for habitat restoration and enhancement. Surveys should cover an appropriate buffer to account for hydrological changes as well as any areas where access tracks/track upgrades and borrow pits may be proposed. Where Annex 1 or UKBAP Priority Habitats occur we recommend surveys to NVC level. Target notes should be used to identify the presence of any notable plants including any nationally rare/scarce species, and an assessment of habitat condition is also recommended. We recommend that survey results are used to inform the design and layout process, so that the development avoids, where possible, sensitive habitats such as blanket bog and montane heath. Where this is not possible, impacts should be minimised and suitable mitigation, restoration and/or compensation measures be proposed. We note that the applicants intend to make use of existing infrastructure as far as possible. Assessment should consider the extent of habitat loss and damage, both direct and indirect, temporary and permanent, and suitable mitigation and/or restoration measures be presented in an Outline Habitat Management Plan and Peat Management Plan. <u>Priority Peatland Habitats</u> The scoping report helpfully references our updated peatland guidance at: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitatsdevelopment-management. We recommend that the applicants follow this guidance which includes advice on the mitigation hierarchy; survey and assessment; and mitigation and enhancement, including peatland restoration techniques, Habitat Management Plans and the level of information which would be expected for a future application. In line with our guidance an assessment of peatland condition should be provided in the EIAR, and we recommend this is guided by the template provided in Annex 1 of the guidance. NPF4 Policy 5 (Soils) provides protection for carbon-rich soils and peatlands. NPF4 Policy 5d requires that 'where development on peatland, carbon-rich soils or priority peatland is proposed, a detailed site specific assessment will be required'. Development proposals on peat should be supported by a site-specific and detailed peat survey, a Peat Management Plan and a Peat Landslide Hazard Risk Assessment (PLHRA)2 . We advise that site-specific assessments and surveys inform the project design and siting to ensure compliance with the mitigation hierarchy. Where impacts cannot be avoided, they should be minimised, and our current recommendation is that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) should be in the order of 1:10 (lost:restored), i.e. 1ha loss of peatland should result in measures to restore 10ha of peatland. Policy 3 (Biodiversity) also applies to all development proposals, so any proposal affecting carbon-rich soils and peatlands must take into account the requirements to conserve, restore and enhance biodiversity, including priority peatland habitats. Six of the proposed turbine locations are within an area mapped as Class 1 peatland. Aerial imagery suggest the presence of lochans indicating potentially sensitive peatland habitats. Some of the site is	Detailed habitat surveys have been carried out and used to inform an iterative approach to Site design. Methods and results of baseline habitat surveys, including Phase 1, National Vegetation Classification and Peatland Condition surveys will be presented in the Ecology Chapter of the EIAR and associated figures and technical appendices. Any data gaps and limitations to assessment will be discussed. Assessment will consider direct and indirect, permanent and temporary effects. Any proposals for mitigation, compensation and enhancement, as appropriate, will be set out in the chapter and the OBEMP to be included as a Technical Appendix. NPF4 Policy 3b will be considered throughout the assessment process and referenced where relevant in the Ecology and Ornithology EIAR chapters. A detailed peat survey, peat management plan and PLHRA will be provided as Technical Appendices to the Hydrology, hydrogeology, geology and peat chapter of the EIA. The design layout of the Proposed Development has been updated to avoid sensitive habitats.

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				above 600m and montane bog could also be present. We note that NVC surveys will be carried out across the development site. We would be pleased to discuss the proposal further with the applicants, in relation to the mitigation hierarchy and impacts on priority peatland, once results of NVC surveys are available. Our updated guidance includes further information on where impacts to peatland habitats could raise issues of national interest and the implications of this for our advice. If the proposal raises issues of national interest we may object to the application (see: https://www.nature.scot/doc/guidance-notice-no-019-identifying-natural-heritage-issues-national-interest-development-proposals). <u>Ornithology</u> We note that two years of survey work have been carried out, with additional surveys proposed to accommodate site boundary changes and the proposed access route to the north-west of the wind farm. Prior to submission of any future application we advise that the applicants ensure that all survey methods have followed the guidance at: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-on-shore-wind-farms. We have the following initial comments on the survey methods: - We are pleased to note proposals to use existing access tracks as far as possible for the wind farm construction. We recommend that the desk study and survey work also cover the proposed access plus relevant buffers. This is to allow the potential for disturbance and displacement to be assessed, especially for Schedule 1 species or black grouse, and any mitigation requirements to be identified. Similarly, we recommend that any areas proposed for habitat restoration or enhancement are covered by appropriate survey and assessment. - In accordance with our guidance, the EIAR should demonstrate that vantage point locations have provided sufficient coverage of the site, particularly at turbines T01, T03 and T08. - If coverage to recommended buffers has been affected by access limitations the EIAR should explain any areas which could not be covered and how these were assessed. Once survey work is complete an assessment of potential impacts through habitat loss/change, disturbance and/or displacement, and collision risk to SPA and wider countryside bird populations will be required, both for the proposal on its own and in combination with other projects. We advise that a cumulative assessment is carried out at the level of the relevant Natural Heritage Zone (NHZ7 for this proposal) or SPA population (see: https://www.nature.scot/doc/guidance-assessing-cumulative-impacts-on-shore-wind-farms-birds). Depending on submission timescales we may be able to provide additional data to assist with the cumulative assessments, on request from the applicants. Mitigation options should be considered as part of the assessment process, and we recommend these details are included as part of any future application. <u>Wider Countryside Birds</u> In addition to SPA protected species, legally protected birds in the wider countryside such as golden eagle, black grouse and upland waders could be affected by the proposal, either as an individual scheme or in combination with other developments in the area. Assessments of impacts to wider countryside birds should be in the context of their NHZ7 populations in accordance with our guidance at: https://www.nature.scot/doc/guidance-assessing-significance-impacts-bird-populations-on-shore-wind-farms-do-not-affect-protected. This proposal has the potential to impact on the NHZ7 golden eagle population, both as an individual scheme and in combination with other developments in the area, through the potential for collision risk and displacement from foraging habitat. An assessment of potential impacts will be required. We are pleased to note that a GET (Golden Eagle Topographical) model assessment is to be carried out. We refer the applicants to our website for further advice at: https://www.nature.scot/doc/naturescot-statement-modelling-support-assessment-forestry-and-wind-farm-impacts-golden-eagles. If black grouse could be affected we would expect the EIAR to include information on the importance of any lek(s) in the local context, and to consider the potential for indirect effects due to changes to foraging and roosting habitat. We advise that a buffer of at least 500m is incorporated between any lek	Please refer to the design evolution section of the Gatecheck Report for further details. Details will also be included in chapter 2 of the EIAR. Methods and results of baseline ornithology surveys will be presented in the Ornithology Chapter of the EIAR and associated figures and technical appendices. Any data gaps and limitations to assessment will be discussed. Assessment will consider potential impacts through habitat loss/change, disturbance and/or displacement, and collision risk to SPA and wider countryside bird populations, including consideration of cumulative effects, and outline proposed mitigation where relevant.

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				site and turbines to minimise the risk of displacement during operation. Additional mitigation would be required during construction to avoid causing disturbance to lekking birds during the sensitive breeding season. Where the applicants propose to scope out detailed assessment of certain ornithological interests we recommend a brief appraisal to justify why they have been scoped out of detailed impact assessment is included in the EIAR, along with details of survey methods, results and any mitigation. We recommend that potential impacts from habitat loss and modification should be considered, particularly in the context of upland breeding waders. If wood sandpipers could be affected by this proposal we would expect all potential impacts to be assessed, and would recommend the applicants contact us to discuss this. On request we can provide guidance on the NHZ population size for this species, which is likely to be very small. Further information and advice on assessment of impacts to birds from wind farms (including collision risk modelling, SPA connectivity, effects of aviation lighting, etc) is available on our website, see: https://www.nature.scot/professional-advice/planning-and-development/planning-and-developmentadvice/renewable-energy/onshore-wind-energy/wind-farm-impacts-birds. In relation to question 5.3.6 of the scoping report, as set out for example in the Scottish Government Draft Planning Guidance on Biodiversity, where possible measures to compensate for biodiversity loss and to provide enhancement should happen within the development site. However, off-site delivery may be justified where there is not adequate opportunity on-site, or significantly better outcomes can be achieved elsewhere. Even where this is the case, we advise that effort should still be made to explore and provide on-site actions too. For further advice see: https://www.nature.scot/professional-advice/planning-anddevelopment/planning-and-development-advice/planning-and-development-enhancing-biodiversity. <u>Landscape and Visual Impacts</u> Whilst we anticipate that there are likely to be a range of significant landscape and visual impacts as a result of this proposal, based on the initial scoping layout we do not anticipate the effects of this proposal to raise issues of national interest. We therefore will not be providing the Energy Consents Unit with detailed landscape advice at this stage. If the proposal substantially changes we may review this at application stage. We refer the applicants to our website for further advice at: https://www.nature.scot/professionaladvice/planning-and-development/planning-and-development-advice/renewable-energy/onshore-windenergy/wind-farm-impacts-landscape. Advice on lighting assessment methods and mitigation options can be found in Annex 1 of our pre-application advice document, see: https://www.nature.scot/doc/naturescot-pre-application-guidance-onshore-wind-farms. Given the intervening distance between the proposed development our current view is that Assessments of Effects on the SLQs of the Glen Affric National Scenic Area (NSA) and the Cairngorms National Park are unlikely to be deemed necessary, although we support the applicant's proposal to undertake an initial assessment so that reasoning can be provided in the EIAR. Our current view is also that detailed Wild Land Assessments are unlikely to be required for this proposal. The Highland Council are best placed to advise on Special Landscape Areas (SLAs) and other landscape and visual impacts, and on which wind farm developments should be included within the cumulative assessment. For further advice on cumulative assessments see: https://www.nature.scot/doc/guidanceassessing-cumulative-landscape-and-visual-impact-onshore-wind-energy-developments. We are content for the proposed viewpoint locations to be agreed with the Highland Council. <u>Protected Species</u>	To be addressed in the relevant Chapters and Technical Appendices of the EIAR. The potential impacts of lighting will be assessed in the LVIA Chapter of the EIAR and mitigation identified. An initial assessment of effects on SLQ of Glen Affric NSA and the Cairngorms National Park will be provided in the LVIA Chapter of the EIAR. Viewpoint locations have been agreed with the Highland Council.

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				We recommend that all survey, assessment and mitigation follows our standing advice at: https://www.nature.scot/professional-advice/planning-and-development/planning-and-developmentadvice/planning-and-development-standing-advice-and-guidance-documents. In relation to mountain hares we advise the applicants follow our guidance at: https://www.nature.scot/doc/standing-advice-planning-consultations-mountain-hare. We recommend that, in accordance with our guidance, protected species also cover the access route to the north-west of the wind farm as well as any areas proposed for habitat restoration. We advise that NBN gateway records are also reviewed as part of the desk study. As noted in Section 1 above, as a qualifying interest of the River Moriston SAC, we recommend that the need for freshwater pearl mussels are considered in line with our guidance at: https://www.nature.scot/doc/standing-advice-planning-consultations-freshwater-pearl-mussels. We note the applicant's intention to scope out a number of protected species from impact assessment. We would however still recommend a brief appraisal is included in the EIAR to justify why they have been scoped out of detailed impact assessment, along with details of survey methods, results and any mitigation and/or Species Protection Plans. Impacts to salmon and freshwater pearl mussel will still require full consideration in the context of the River Moriston SAC (see above). <u>Bats</u> At this stage we have not seen details of the bat detector layout in relation to the development. We advise users to check the Mammal Society's Ecobat website for further updates on availability. In the interim, we suggest that EIA reports might explain the unavailability of EcoBat and that alternative analysis should attempt to infer the level of relative bat activity, for example by comparing target site activity data with that from similar surveys in comparable geographic locations and habitat types. Regardless of the analytical approach, we advise that data is still presented in the format suggested at Appendix 1 of the bat guidance at https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-andmitigation (see also "NatureScot pre-application guidance for onshore wind farms" via previous link). <u>Deer Management</u> If wild deer are present on or use the development site, the EIAR should include an assessment of the potential impacts of the development on deer welfare, habitats, road safety, neighbouring and other interests such as nearby protected areas. Where significant impacts may result, a deer management statement should be provided to address the impacts, either as part of a Habitat Management Plan, a stand-alone document or modification of an existing Deer Management Plan. For further advice see: https://www.nature.scot/doc/guidance-planning-and-development-what-consider-and-include-deerassessment-and-management.	Approach to desk study, survey, assessment and mitigation for protected species will be provided in the Ecology Chapter of the EIAR and associated technical appendices and figures. Where features are proposed to be scoped out of detailed assessment, justification will be provided. Approach to survey, assessment and mitigation for bats will be provided in the Ecology Chapter of the EIAR and associated technical appendices and figures. It is noted that Ecobat is confirmed as being available for use again (as at end 2024) and so it is intended that Ecobat will be used for the analysis, in accordance with the bat guidance. A deer assessment and accompanying technical appendix will be included in the Ecology Chapter of the EIAR.
SEPA	Jonathan Werritty	Planning.north@sepa.org.uk	Scoping response letter dated 21/02/2024	<u>Site specific comments</u> The NatureScot Carbon and Peatland Map (2016) indicates that most of the site is Class 1 Peat soil / Peatland. The applicant will need to demonstrate that this finalised layout / proposal accords with the mitigation hierarchy as set out in NPF4 Policy 5.	The design evolution of the Proposed Development has been sensitive to habitats of ecological value, with avoidance a key consideration as much as practicably possible. Bog pools and their established buffers have been largely avoided through design, and peatland which is considered of priority peatland in accordance with NS guidance has been avoided as far as practicable. Any losses of peatland habitats (including mosaics with a high proportion of peatland NVC communities), will

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				We note the intention to undertake an additional Phase 2 peatland probing survey and submit a Peat Management Plan once an infrastructure layout plan is available. Given that T1 and T3 are located on a section of the site where there is no peat survey data, we welcome the commitment to undertake a further Phase 1 survey (at a 100m grid resolution) to inform the infrastructure layout plan. Potential GWDTE have been identified in similar habitats on other sites. There is therefore the potential that they are present on this site. We welcome the commitment to undertake an National Vegetation Classification (NVC) survey. Whilst existing tracks will be used the size of the proposed turbines will necessitate modifications to the existing track network. Modifications and environmental impacts should be kept to a minimum. We will require the submission of plans that show where modifications will be required. We will need confirmation of the location of the proposed BESS and any borrow pits that are required. Based on the information provided at this stage it seems unlikely that any development will take place within 250m of a groundwater supply source; only one Private Water Supply is shown to be present on site. Provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses we do not foresee from current information a need for detailed information on flood risk. <u>Site Layout</u> All maps must be based on an adequate scale with which to assess the information. This could range from OS 1:10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded where possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required	however, be fully considered in the relevant chapter of the EIAR, and appropriate mitigation and enhancement will be considered in line with relevant guidance that will be in place during the time of planning application submission. The design of proposed infrastructure elements is minimising ground disturbance as far as practicable, by utilising existing infrastructure (existing tracks) and co-locating proposed infrastructure components as far as practicable e.g., existing borrow pit and proposed extension with substation and battery energy storage compound. Several peat depth surveys were conducted, in accordance with the relevant NatureScot and Ironside Farrar requirements, to ensure areas with deep peat are avoided as much as possible. To be addressed in the relevant Chapters and Technical Appendices of the EIAR. Noted. A swept path analysis along the existing track confirmed that only minor modifications may be required along the existing track to accommodate the delivery of turbine blades to the turbine locations. The EIAR will include a full description of the Proposed Development, including details on the BESS and borrow pits. To be addressed in the relevant Chapters and Technical Appendices of the EIAR. To be addressed in the relevant Chapters and Technical Appendices of the EIAR. The EIAR will include maps based on an adequate scale, showing proposed infrastructure as requested, as well as relevant constraints that were avoided during the iterative design stage (i.e., watercourse and associated buffers, private water supplies, etc.)

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				<u>Engineering activities</u> The site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. The submission must include a map showing: - All proposed temporary or permanent infrastructure overlain with all lochs and watercourses - A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability Flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment (FRA) must be submitted. <u>Disturbance and re-use of excavated peat and other carbon rich soils</u> Where proposals are on peatland or carbon rich soils the following should be submitted to address the requirements of NPF4 Policy 5: - layout plans showing all permanent and temporary infrastructure, with extent of excavation required, which clearly demonstrates how the mitigation hierarchy outlined in NPF4 has been applied. These plans should be overlaid on: - peat depth survey showing interpolated peat depths; - peatland condition mapping; - National Vegetation Classification (NVC) survey habitat mapping - An Outline Peat Management Plan; and - An Outline Habitat Management Plan. In order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals: - Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories; - Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth; - Minimise impact on local hydrology; and - Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of the Peatland Survey – Guidance on Developments on Peatland (2017). In line with the requirements of Policy 5d of NPF4, the development proposal should include plans to restore and/or enhance the site into a functioning peatland system capable of achieving carbon sequestration. The outline Peat Management Plan should also include - Information on peatland condition; - Information demonstrating avoidance and minimisation of peat disturbance; - Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; - Proposals for temporary storage and handling; and - Reuse volumes in different elements of site reinstatement and restoration. Handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not	All considerations raised during the scoping process have been addressed through the iterative design process of the Proposed Development. Addressed through the iterative design stage of the Proposed Development. A detailed peat survey has been undertaken and peat management plan will be provided as technical appendix to the Hydrology, hydrogeology, geology and peat chapter. An OBEMP will be provided as a technical appendix to the Ecology Chapter. Addressed through the iterative design stage of the Proposed Development. To be addressed in Outline Peat Management Plan of the EIAR.

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				suitable for use in verge reinstatement, re-profiling/ landscaping, spreading, mixing with mineral soils or use in bunds. Disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations outwith the development boundary). The faces of cut batters, especially in peat over 1m, should be sealed to reduce water loss of the surrounding peat habitats, which will lead to indirect loss of habitat and release of greenhouse gases. This may be achieved by compression of the peat to create an impermeable subsurface barrier, or where slope angle is sufficiently low, by revegetation of the cut surface. The outline Habitat Management Plan should include: - Proposals for reuse of disturbed peat in habitat restoration, if relevant; - Details of restoration to compensate for the area of peatland habitat directly and indirectly impacted by the development; - Outline proposals for peatland enhancement in other areas of the site; and - Monitoring proposals. <i>Disruption to GWDTE and existing groundwater abstractions</i> Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification survey which includes the following information should be submitted: - A map demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it. - If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. <u>Forest removal and forest waste</u> If forestry is present on the site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber <u>Borrow pits</u> The following information should also be submitted for each borrow pit: - A map showing the location, size, depths and dimensions; - A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks; and - Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. <u>Pollution prevention and environmental management</u>	The EIAR and OBEMP will outline enhancement measures, and these will include peat restoration and riparian planting. Impacts on hydrology, hydrogeology, geology and peat will be fully assessed within the relevant chapter of the EIAR. NVC surveys have been undertaken to inform the presence of habitats indicative of groundwater dependence. Results will be presented in the EIAR, along with further hydrological assessment into the likelihood of 'true' groundwater dependence, and any mitigation, if required. No forestry felling is required for the Proposed Development. Indicative borrow pit dimensions will be included in the Borrow Pit Assessment (BPA) that will be submitted in Volume 3 of the EIAR, as a Technical Appendix. As exact volumes of material available for borrow pit restoration are not confirmed prior the detailed design stage (post-consent), indicative BP restoration profiles will be incorporated in the BPA.

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				A schedule of mitigation supported by the above site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.	A schedule of mitigation will be prepared for the EIAR and included as a Schedule of Environmental Commitments.
Defence Infrastructure Organisation	Teena Oulaghan Safeguarding Manager	Teena.oulaghann100@mod.gov.uk Tel: 07970 170934	Scoping response dated 27/02/2024	MOD has concerns with the proposal for the potential to create a physical obstruction to low flying aircraft as the site falls within Low Flying Area 14. To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. The development proposed includes wind turbine generators and/or meteorological mast(s) that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.	The MOD was sent an aviation lighting design document for review in November 24, which was approved. Further details will be included in the Aviation and Radar Chapter of the EIAR.
Aberdeen Airport	ABZ Safeguarding	abzsafeguarding@aiairport.com	Scoping response dated 21/02/2024	This proposal is located outwith the consultation area for Aberdeen Airport. As such, we have no comment to make and need not be consulted further.	No action required.
Crown Estate Scotland	Olivia Morrad Assistant Portfolio Co-ordinator Crown State Scotland	Olivia.morrad@crownestatescotland.com Tel: 0131 376 1506 / 07407 378899	Scoping response dated 25/03/2024	The assets of Crown Estate Scotland are not affected by this proposal and we therefore have no comments to make	No action required.
Glasgow Airport	GLA Safeguarding	glasafeguarding@glasgowairport.com	Scoping response dated 19/02/2024	The proposal is located outwith our consultation	No action required.
Highlands and Islands Airports HIAL	Nyree Millar-Bell Aerodrome Safeguarding and Operations Support Officer	NBell@hial.co.uk	Scoping response dated	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objection to the proposal.	No action required.
NATS	NATS Safeguarding	natssafeguarding@nats.co.uk	Scoping response dated 06/02/2024	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NAT (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	NATS to be consulted at Gatecheck to re-evaluate the finalised design of the Proposed Development.
ONR	ONR Land Use Planning	ONR-Land.Use-	Scoping response dated 05/02/2024	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	No action required.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
		planning@onr.gov.uk			
RSPB	Allison Phillip Conservation Officer	Tel: 0131 317 4100	Scoping response dated 07/03/2024	<u>West Inverness-shire Lochs Special Protection Area and Site of Special Scientific Interest</u> The small numbers of common scoter in West Inverness-shire Lochs SPA comprise a large proportion of the entire UK breeding population. The SPA status for this designated feature is already unfavourable and declining. Knowledge of aspects of the ecology and migratory behaviour of the West-Inverness-shire Lochs common scoter and black-throated diver populations and their interaction with onshore turbines is uncertain, and since data on flights through the site are not available, the impacts of collision risk, disturbance, displacement and barrier effects on these species at this site cannot be fully understood and thereby assessed. We therefore disagree that Common Scoter should be scoped out of detailed assessment within the EIA. We do not have access to the Beinneun Wind Farm (EC00003137) documents which have been referred to in the (5.3.34), which seems to be relevant to this designated site and common scoter. However, we note that this report is over 10 years old and likely to be out of date. We are not aware of any detailed post-construction monitoring for Common Scoter at any onshore wind farm sites, and therefore, there is still uncertainty regarding collision risk for this species. As the population is so small, even a low number of collisions could have a severely detrimental population level effect. Indeed, due to the lack of research, we do not know how breeding scoter interact with infrastructure and onshore turbines or how they move around the landscape of the West-Inverness-shire Lochs or the routes they use to access this important breeding site, before and after the breeding season. The species is notoriously difficult to study. This means that the impacts of collision risk, disturbance, displacement and barrier effects on this species at this site are not fully understood. Due to the location of the proposal and the nature of the development, we believe that there would be likely significant effects on Common Scoter as a qualifying interests of West-Inverness-shire Lochs SPA European site, from the proposed wind farm alone and in combination with other projects. Consequently, the determining authority is required by the Conservation of Habitats and Species Regulations 2017 to undertake an Appropriate Assessment of the effects of the proposal on the SPA and their species in light of the site's conservation objectives. The EIA Report must include sufficient information to inform the Appropriate Assessment. If the potential impacts of the proposal cannot be sufficiently mitigated and there could be adverse impacts on the integrity of these sites, then it is unlikely that the determining authority would be able to grant consent in accordance with the Habitat Regulations requirements. <u>Biodiversity Enhancement</u> We welcome that the Scoping Report states that NPF4 Policy 3 will be fully considered in relevant chapters of the EIAR, and that mitigation, compensation and enhancement proposals will be provided in an Outline Biodiversity Enhancement Management Plan (OBEMP). Any mitigation, compensation and enhancement measures must be clearly and separately identified within the EIA and other accompanying documents. It is RSPB Scotland's current view that biodiversity enhancement measures should not be delivered on designated sites for nature, apart from in a small number of exceptional circumstances, and enhancement measures must be truly additional. In addition to NPF4 policies, Scottish Government planning guidance on biodiversity, focusing on the implementation of Policy 3 for EIA and major development was published in November 2023. Despite the fact that the document is labelled 'Draft Planning Guidance', it is the up-to-date expression of the Government's position on the implementation of Policy 3. The term 'draft' does not indicate a consultation document but is understood to reflect that it is "a 'living document'... that will be updated as practice beds in" (paragraph 5.1). The document should therefore be given significant material weight. We note that proposed habitat and biodiversity enhancement measures will likely incorporate peatland restoration and native woodland planting. New NatureScot guidance is now available on development on peatland and outlines recommendations for compensation and enhancement in line	Consideration of the West Inverness-shire Lochs SPA and SSSI, including desk study and review of appropriate available data sources, and justification of approach in relation to common scoter and black-throated diver, will be included in the Ornithology Chapter and Technical Appendices of the EIAR. Appropriate mitigation and enhancement measures will be incorporated in the OBEMP, in line with relevant guidance that will be in place during the time of planning application.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				with Policy 3 of NPF4. This should be taken account in relation to any proposed mitigation, compensation proposals and enhancement. The NatureScot guidance states 'that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) would be in the order of 1:10 (lost:restored)' plus 'an additional 10% of the baseline assessment of the extent of priority peatland habitat for biodiversity enhancement'.	
ScotWays	Lydia Grant Access Officer	Tel: 0131 558 1222	Scoping response dated 20/02/2024	<u>Other Access to Land</u> You should be aware that other forms of public access to land may affect the proposed application site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes. <u>Wind Farms and public access</u> It is our understanding that there is very little guidance regarding the siting of turbines in relation to established paths and rights of way, so we use the following starting principle in considering what could be reasonable: <i>"a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line."</i> ScotWays considers the above sets out a reasonable principle for a recommended minimum separation distance. There could also be site specific factors which would lead us to prefer a larger minimum separation distance; these could include the affected route being one of Scotland's Great Trails or it being known for equestrian use, for example. ScotWays is likely to object to any proposal where the above principle is not followed, including where a micro-siting allowance could lead to turbine encroachment upon a route because it has been insufficiently buffered. Figure 2.2 <i>Site Layout</i> shows the proposed turbine locations: it appears that the proposed T01 and T02 sit in close proximity to the recorded line of HL31/HI103. We ask for confirmation from the applicant of the separation distances for each of these turbines. <u>Recreational amenity</u> As well as direct impacts of development upon public access, ScotWays has an interest in impacts on recreational amenity, so this includes the impact of wind farm development on the wider landscape. We anticipate that the applicant will take into account both recreational amenity and landscape impacts in developing their proposals for this site. We will consider these issues further should this scoping stage lead to a planning application. <u>Cumulative Impact</u> As ScotWays is aware of a number of wind turbine proposed in this general area, we are particularly concerned that the cumulative impact of these proposed developments is taken into account. <u>Comment</u> At this stage it appears that the recreational baseline is incomplete and public recreational access not been fully considered. ScotWays can find no information on any recreational routes that cross the site: although mention is made of core paths there is nothing to indicate that the applicant has considered the above noted recorded rights of way which are directly affected by the application site. Whilst the proposed turbine locations are shown on Figure 2.2 <i>Site Layout</i> there is nothing to indicate the associated internal site access track routes: the above noted routes are likely to be affected by any new access tracks. The effects that the proposed development will have on the above noted routes need to be considered.	To be addressed in the Design and Access Statement that will be submitted with the s36 application for consent. Impacts on baseline landscape and visual amenity resulting from the Proposed Development alone and cumulatively with other wind farm sites (consented, in planning and at scoping) will be assessed in the LVIA Chapter of the EIAR.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
				Under section 3 of the Land Reform (Scotland) Act 2003, there is a duty upon landowners to use and manage land responsibly in a way which respects public access rights. Under section 14 of the same Act, access authorities have a duty to uphold access rights. Accordingly, we suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.	
Fisheries Management Scotland	Brian Davidson Director – Communications and Administration	Tel: 0131 221 6567 / 07584 484602	Scoping response dated 31/01/2024	The proposed development falls within the district of the Ness District Salmon Fishery Board. It is important that the proposals are conducted in full consultation with the Board. Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development: https://fms.scot/wp-content/uploads/2017/04/170412-Guidance-Terrestrial-windfarms.pdf https://fms.scot/about-us-2/our-members/dsfb-trust-map/	To be consulted when s36 application is submitted. Noted.
Glasgow Prestwick Airport	Ian Hutchinson Aerodrome Safeguarding Manager	ihutchinson@glasgowprestwick.com Tel: (+44) 01292 511038	Scoping response dated 31/01/2024	The proposed development lies outwith the GPA safeguarding area and consequently we would have no comment or valid objection to make.	No action required.
Joint Radio Company		windfarms@jrc.co.uk Office tel: 02476 932 185 Friar's House Manor House Drive Coventry, CV1 2TE United Kingdom	Scoping response dated 06/02/2024	The proposal is "cleared" with respect to radio link infrastructure operated by the local energy networks. In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above). It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project	JRC to be consulted at Gatecheck to re-evaluate finalised design of Proposed Development.
The MET Office	Tim Allot Upper Air Observations	metofficesafeguarding@metoffice.gov.uk	Scoping response dated 02/02/2024	The proposed development is at least 130km from any of our meteorological radars and beyond the 20km radius consultation zones. Therefore, we have no comments on the proposal and do not need to be consulted further.	No action required.
The Coal Authority	The Coal Authority Planning Team	Planningconsultations@coal.gov.uk	Scoping response dated 01/02/2024	The site to which this submission relates is not located within the defined coalfield. On this basis we have no specific comment to make.	No action required.
Transport Scotland	Gerard McPhillips Transport Scotland Roads Directorate	Gerard.mcphillips@transport.scot.nhs.uk Direct Line: 0141 272 7350 Fax: 0141 272 7350 George Houe 36 North	Scoping response dated 19/02/2024	For the avoidance of doubt, Transport Scotland would request that the thresholds as indicated within the current 2023 Guidelines be used as a screening process for the assessment. These specify that road links should be taken forward for further assessment where the following two rules are breached: Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%). Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.	To be addressed in the Traffic and Transport Chapter of the EIAR.

Consultee	Contact Name (including title if available)	Reference and Contact Details	Method and Date of Consultation	Comments received / issues raised	Action Required / Taken
		Hanover Street Glasgow G1 2AD		For any trunk road links where the thresholds are breached, Transport Scotland would seek the following list of impacts be assessed: • Severance of communities • Road vehicle driver and passenger delay • Non-motorised user delay • Non-motorised amenity • Fear and intimidation on and by road users • Road user and pedestrian safety • Hazardous/large loads It is noted that “road user and pedestrian safety” and “driver delay” effects require further consideration even if the rules are not exceeded. With regard to base traffic data, the SR indicates that 24-hour Automatic Traffic Count (ATC) data will be obtained from the Department for Transport (DfT), Transport Scotland (TS) or the Highland Council (THC) and where not available / suitable, ATC surveys will be undertaken. Transport Scotland is satisfied with this approach and would add that traffic data is available from Traffic Scotland’s National Traffic Data System. The SR states that the count points identified have either data from 2019 (pre COVID-19) or 2022 (or both). Given that 2019 data is now 5 years old, Transport Scotland would request that, where possible, 2022 data and beyond be utilised. We would also state that base traffic data will require to be factored to the peak construction year using National Road Traffic Forecasts (NRTF) Low Growth. It is noted that any impacts associated with the operational and decommissioning phases of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance. <u>Site Access</u> We note that the existing junction is to be utilised to access the development. If this is to be modified in any way then Transport Scotland would request that 1:500 scale plans are submitted with the application showing the new layout. It is noted that a road safety audit will also be required to accompany any proposal. <u>Abnormal Loads Assessment</u> We note that preliminary routeing assessments of the turbine components have been carried out. The Port of Entry (PoE) has been identified as the Port of Kyle of Lochalsh for turbine blades and Corpach Harbour for tower sections and other large components. Routeing of the components to the site will include sections of the A87(T), A887(T), A830(T) and A82(T). Transport Scotland will require to be satisfied that the size of Abnormal Indivisible Loads (AIL) used during the transportation of development components can negotiate the selected routes and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report will be required which identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	An indicative existing junction modification plan, including anticipated bellmouth extension works to accommodate the delivery of turbine blades, will be submitted with the s36 application for consent. To be addressed in the Traffic and Transport Chapter of the EIAR.

APPENDIX 3: FINAL VIEWPOINT LOCATIONS

VP No.	Name	Grid ref		Approx. Distance from nearest proposed turbine (km)	Visualisation Type ⁶	Reason for Selection
1	Core Path Allt Phocaichain	232536	810887	3.5 km	Day-time PHM (THC and NatureScot)	Represents views from core path IN16.16.
2	Dalchreichart	227903	812981	3.6 km	Day-time and Night-time PHMs (THC and NatureScot)	Represents views from nearest community.
3	A887 Layby near site entrance	225400	811603	3.6 km	Day-time PHM (THC and NatureScot)	Represents views from A887.
4	Core Path Loch Lundie	229685	803163	5.2 km	Day-time PHM (THC and NatureScot)	Represents views from core path LO11.02
5	Caledonian Canal/Great Glen Way	234109	804705	5.3 km	Day-time PHM (THC and NatureScot)	Represents views from Great Glen Way, NCR 78, water-based receptors using the canal
6	A887 at Dundregan	231979	814136	5.8 km	Day-time and Night-time PHMs (THC and NatureScot)	Represents views from Dundregan community and A887.

⁶ the solar PV will be included in the photomontage and wireline visualisations where visible.

VP No.	Name	Grid ref		Approx. Distance from nearest proposed turbine (km)	Visualisation Type ⁶	Reason for Selection
7	A82 near Newtown, Aberchalder	235458	805131	6.1 km	Day-time and Night-time PHMs (THC and NatureScot)	Represents views from Aberchalder community and A82
8	Core path Creag an Larlain	236112	810316	6.3 km	Day-time PHM (THC and NatureScot)	Represents views from core path IN16.03
9	A82 Fort Augustus	237470	808694	7.3 km	Day-time PHM (THC and NatureScot)	Represents views from Fort Augustus and A82
10	Loch Oich Great Glen Way	232558	801315	7.4 km	Day-time PHM (THC and NatureScot)	Represents views from Great Glen Way and water-based receptors using Loch ich
11	Caledonian Canal Boat Lift	237604	809159	7.5 km	Day-time PHM (THC and NatureScot)	Represents views from Great Glen Way and Fort Augustus.
12	Old Military Road north of the A87	220288	811323	7.5 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers on the military road footpath.
13	Core Path Meall Ruigh Uisdein	228986	817411	8 km	Day-time PHM (THC and NatureScot)	Represents views from core path IN05.03

VP No.	Name	Grid ref		Approx. Distance from nearest proposed turbine (km)	Visualisation Type ⁶	Reason for Selection
14	South Loch Ness Trail	239657	808903	9.5 km	Day-time PHM (THC and NatureScot)	Represents views from South Loch Ness Trail, Loch Ness and Fort Augustus Viewpoint and B862.
15	Meallan Odhar	221170	817284	10.7 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
16	Beinn Loinne	213096	807694	14.2 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
17	A887 Loch Cluanie	214488	810306	12.9 km	Day-time PHM (THC and NatureScot)	Represents views from A887
18	Corrieyairack Pass	240379	799414	13.5 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
19	Meall Coire nan Saobhaidh	217464	795126	16.5 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
20	Toll Creagach	219454	828273	20.9 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
21	Core Path West Aberchalder	255035	819818	27.4 km	Day-time PHM (THC and NatureScot)	Represents views from core path IN25.02



VP No.	Name	Grid ref		Approx. Distance from nearest proposed turbine (km)	Visualisation Type ⁶	Reason for Selection
22	Creag Meagaidh	241842	787552	23.8 km	Day-time PHM (THC and NatureScot)	Represents views experienced by hill walkers
23	Old Military Road at Tomchrasky	225681	812424	4.2 km	NatureScot wireline only	Represents views experienced by walkers using the old military road footpath
24	Ben Tee	224049	797215	11.7 km	NatureScot wireline only	Represents views experienced by hill walkers
25	Carn Ghlusaid	214645	812536	13.2 km	NatureScot wireline only	Represents views experienced by hill walkers.

APPENDIX 4: CUMULATIVE BASELINE FOR THE LVIA



ID	Wind Farm Name	Status	Blade tip height (m)	Number of Turbines	Distance (km) ⁷
1	Millennium	Operational	115 m (20) + 125 m (6)	26	0 km
2	Beinneun + Extension	Operational	133.5 m (25) + 136.5 m (7)	25 + 7	3.2 km
3	Bhlaraidh	Operational	125 m (2) + 135 m (30)	32	11.5 km
4	Corrimony	Operational	100 m	5	15.9 km
5	Stronelaig	Operational	125 m (13) + 132.5 m (53)	66	18.7 km
6	Corriegarth	Operational	119.3 m	23	27.2 km
7	Dunmaglass	Operational	119 m	33	34 km
8	Fairburn	Operational	100 m	20	44.6 km
9	Bunloinn	Consented	200 m (4) + 230 m (6)	10	9.5 km
10	Bhlaraidh Extension	Consented	180 m	22	14.7 km

⁷ Distance between nearest turbine of scheme to nearest turbine of Proposed Development.



ID	Wind Farm Name	Status	Blade tip height (m)	Number of Turbines	Distance (km) ⁷
11	Cloiche	Consented	149.9 m	36	17.1 km
12	Dell	Consented	130.5 m	14	18.8 km
13	Corriegarth 2	Consented	149.9 m	16	25.1 km
14	Aberarder	Consented	129.35 m	12	35.8 km
15	Tomchrasky	In Planning	185 m	14	5.8 km
16	Culachy	In Planning	200 m	8	10 km
17	Chrathaich	In Planning	149.9 m	14	13.1 km
18	Loch Laith	In Planning	180 m (2) + 200 m (11)	13	16.4 km
19	Dell 2	In Planning	180 m (4) +200 m (5)	9	18.8 km
20	Beinneun 2	Scoping	200 m	20	2.1 km



ID	Wind Farm Name	Status	Blade tip height (m)	Number of Turbines	Distance (km) ⁷
21	Fiodhag	Scoping	149.9 m	20	11.0 km
22	Beinn Bheag	Scoping	230 m	28	19.1 km
23	Carn na Saobhaid	Scoping	200 m	29	38.8 km
24	Fairburn Extension	Scoping	200 m	14	39.6 km
	Highland	Scoping	200 m (17) + 230 m (7)	24	44.5 km