

## Appendix 3.3 Gatecheck Report

# BHLARAI DH WIND FARM EXTENSION EIA GATECHECK REPORT

November 2020





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# 1. Introduction

## 1.1 Introduction

SSE Renewables Wind Farms (UK Ltd) ('the Applicant') intends to apply to the Scottish Ministers for consent under Section 36 of the Electricity Act 1989 for the construction and operation of Bhlaraidh Wind Farm Extension ('the Proposed Development'), located on the Glenmoriston Estate, near Invermoriston, Highlands (refer to **Figure 1.1**). The application will be supported by an Environmental Impact Assessment (EIA) Report as required by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended (the EIA Regulations).

## 1.2 Background

The Applicant submitted an EIA Scoping Report for the Proposed Development in July 2019 to the Energy Consents Unit (ECU) at the Scottish Government. The Applicant received an EIA Scoping Opinion in September 2019.

This Section 36 Gatecheck Report provides the ECU with an update on the status of the Proposed Development and progress with the EIA Report. It summarises the design iteration process which the Applicant has undertaken to date and how the Applicant has engaged with consultees. It summarises the responses received within the EIA Scoping Opinion and details how the Applicant intends to respond to these.

The Applicant intends to submit the EIA Report for the Proposed Development to the ECU in Summer 2021.

# 2. Scoping Responses

Scoping responses were received from the following organisations (refer to **Table 2.1**).

*Table 2.1 - Scoping Responses Received*

Consultee	
British Horse Society	NATS Safeguarding
BT	NatureScot (formerly SNH)
Cairngorm National Park Authority (CNPA)	Ness District Salmon Fishery Board*
Crown Estate Scotland	Ness & Beaully Fisheries Trust*
Defence Infrastructure Organisation (Ministry of Defence (MoD))	RSPB Scotland
Fisheries Management Scotland	Scottish Forestry
Fort Augustus & Glenmoriston Community Council	Scottish Water
Glen Urquhart Community Council	ScotWays
Highlands and Islands Airports Limited	Scottish Environment Protection Agency (SEPA)
Historic Environment Scotland (HES)	Strathglass Community Council
Inverness Chamber of Commerce	The Coal Authority
John Muir Trust	The Highland Council (THC)
Joint Radio Company (JRC) Ltd	Transport Scotland
Marine Scotland	Visit Scotland



Consultee	
Met Office	

*\*did not respond to Scoping Request but has since responded via direct email consultation*

No responses to the scoping request were received from the following consultees (refer to **Table 2.2**).

**Table 2.2 - No Scoping Responses Received**

Consultee	
Beaully District Salmon Fishery Board	Scottish Canoe Association
Civil Aviation Authority (CAA)	Scottish Council for Development and Industry
Friends of the Earth (FOE)	Scottish Wild Land Group
Highlands & Islands Enterprise	Scottish Wildlife Trust
Mountaineering Scotland	WWF (Scotland)
Ofcom	

## 3. Design Iterations

### 3.1 Scoping Design

In July 2019, as part of the EIA Scoping Report, the Applicant submitted an indicative turbine layout for the Proposed Development of 20 turbines (refer to **Figure 3.1**).

### 3.2 EIA Scoping Opinion Comments on Design

**Table 3.1** lays out comments which were received from consultees on the design of the Proposed Development presented in the EIA Scoping Report.

**Table 3.1 - EIA Scoping Opinion - Design**

Consultee	Scoping Comment	Page No. <sup>1</sup>	Response to Consultee	Further EIA Consultation
Highlands & Islands Airports Limited (HIAL)	The turbines could possibly affect the performance of electronic aeronautical systems for the airport and is potentially line of sight from our radar.	A52	Turbines positioned outwith line of sight of radar.	N/A
ScotWays	In the context of paths and rights of way, ScotWays highlight guidance on set back distance from turbines to public highways.	A63	Noted.  Proposed turbines are positioned a significant distance from path HI71.	N/A
SEPA	Existing infrastructure should be re-used or upgraded where possible.	A23	Noted.	Further discussion with SEPA regarding

<sup>1</sup> Page Numbers throughout report refer to Scoping Opinion



Consultee	Scoping Comment	Page No. <sup>1</sup>	Response to Consultee	Further EIA Consultation
	<p>Cabling should be laid in ground already disturbed, e.g. verges.</p> <p>Welcome the fact a 50m buffer will be included around all water features.</p>		<p>Following SSER experience at Gordonbush Extension wind farm, further consultation will take place regarding cabling options to be included in EIA Report.</p>	<p>cabling options to be included in EIA Report.</p>
NatureScot	<p>A key design principle should be design coherence with the existing wind farm. Note that present scale and size is not compatible</p> <p>Advise that this visibility from the circular walk around Loch Affric should be designed out.</p>	A31	<p>Noted. This has been taken forward as a key design principle, considering the scale, size and location of proposed turbines in relation to existing turbines, landform and other landscape features.</p> <p>The turbine layout has been amended such that there is no longer visibility from the circular walk.</p>	N/A
THC	<p>Development should be designed to avoid crossing watercourses and to bridge these where this cannot be avoided.</p>	A8	<p>Noted. Design iteration has sought to minimise water crossings. Where unavoidable, water crossings will be designed and sized to maintain greenfield flow conditions.</p>	N/A

### 3.3 Design Iterations

Since the submission of the EIA Scoping Report and the receipt of the EIA Scoping Opinion, the Applicant has undertaken design iterations of the Proposed Development to minimise the environmental impacts. The main iterations are described below in **Table 3.2** and shown on **Figures 3.1** to **3.6**. These iterations have taken into consideration the operational wind farm and on site environmental and engineering constraints.

**Table 3.2 - Design Iterations to Date**

Design Iteration	Figure	No. Turbines	Date	Description
A	3.1	20	July 2019	Scoping layout.
B	3.2	20	December 2019	All environmental survey work carried out over the summer, plus engineering constraints, led to the creation of "No-Build" layer. Technical analysis undertaken to optimising a 20 turbine layout within the remaining areas.



Design Iteration	Figure	No. Turbines	Date	Description
C	3.3	20	December 2019	Engineering review of buildability and civil engineering suitability of turbine locations to produce track alignment. All turbine movement to reflect more buildable location for turbine and hardstanding and track alignment.
D	3.4	18	February 2020	LVIA review leads to an additional area being added to the "No Build" layer. The remaining area is "re-optimised", which effectively leads to 18 new turbine locations albeit with some in very close proximity to previous layout.
E	3.5	18	April 2020	Design Workshop with all environmental consultants and members of SSE project team to create a layout that maximises the generation capabilities of the site whilst taking into account environmental constraints.
F	3.6	18	September 2020	Refinement of the red line boundary following landownership review leads to relocation of Turbines 6 and 17. Substation location is refined following peat surveys.

### 3.4 Future Design Iterations

The Applicant has gathered environmental baseline information for the site across the various technical disciplines to identify a design layout that considers the environmental constraints identified and the consultee opinions received to date. Full details of the design iterations leading to a finalised design will be provided within Chapter 2 of the EIA Report. Notwithstanding some additional survey requirements, we do not anticipate any significant amendments to the design illustrated in Design Iteration F at this stage.

## 4. Planning & Policy

The following comments were received from consultees on planning and policy.

*Table 4.1 - EIA Scoping Opinion - Planning & Policy*

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
THC	EIA Report should regard The Highland Council's Development Plan inclusive of all statutorily adopted supplementary guidance.  Highlighted the Onshore Wind Energy Supplementary Guidance inclusive of the Landscape Sensitivity Appraisal for Loch Ness.	A3	Noted.	N/A

## 5. EIA Report Requirements

The following comments were received from consultees on the EIA Report.



**Table 5.1 - EIA Scoping Opinion – EIA Report**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
SEPA	<p>Maps to be based on an adequate scale for the information.</p> <p>Maps should detail all proposed upgraded, temporary and permanent site infrastructure.</p>	A23	Plans will be appropriately scaled and contain all relevant information.	N/A
THC	<p>EIA Report must include:</p> <ul style="list-style-type: none"> <li>- description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases.</li> <li>- main characteristics of the production process</li> <li>- risk of accidents</li> <li>- estimate of type and quantity of expected residues and emissions</li> <li>- cumulative impact.</li> <li>- alternatives considered and reasoning for Proposed Development.</li> </ul> <p>Visualisations should be prepared to both THC and NatureScot standards and should be provided in separate volumes.</p> <p>EIA Report should present a summary table of all mitigation measures proposed, entitled Schedule of Mitigation.</p> <p>Requests that effects are assessed on a four point scale: strong positive, positive, negative or strong negative.</p>	A2	<p>Chapter 2 of the EIA Report will provide a full description the Proposed Development, including details of the site selection process.</p> <p>Confirm that visualisations will be in accordance with both standards.</p> <p>Chapter 16 of the EIA Report will be a Schedule of Mitigation.</p> <p>Effects will be assessed on an 8 point scale as is industry standard. This is a well-tested and well-established methodology and means of describing the level of effects and is considered more comprehensive and</p>	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
			appropriate than the suggested 'four point scale'.	

## 6. Ecology & Nature Conservation

The following comments were received from consultees on the assessment of ecology and nature conservation.

*Table 6.1 - EIA Scoping Opinion – Ecology & Nature Conservation*

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Fisheries Management Scotland	<p>Advised that consultation should be undertaken with the Ness District Salmon Fishery Board (NDSF Board), and Ness and Beaully Fishery Trust.</p> <p>Provided links to guidance to be considered and contact detail documents:</p> <ul style="list-style-type: none"> <li>- Advice on Terrestrial Windfarms</li> <li>- District Salmon Fishery Board Contact Details</li> <li>- Fishery Trust Contact Details</li> </ul>	A51	Consultation with NSDF Board and Ness and Beaully Fisheries Trust detailed in Table 6.1 below.	N/A
Marine Scotland Science (MSS)	<p>Request the EIA assess the potential impacts on salmon and trout.</p> <p>Advise to consults with the NSDF Board and the Ness and Beaully Fisheries Trust.</p> <p>Highlight Marine Scotland scoping and monitoring guidelines.</p>	A74	Further consultation undertaken to agree the aquatic ecology methodology.	See below.
MSS	<p>Welcome proposal of fish monitoring programme which will be informed by electrofishing and habitat surveys.</p> <p>Recommend that fully quantitative surveys are conducted for monitoring.</p> <p>The results of the proposed surveys should be presented within the EIA Report along with</p>	Direct letter (refer to Appendix A).	Noted. Confirm that the EIA Report will include information on aquatic ecology assessment and mitigation.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	proposed mitigation and proposed monitoring programme.			
NDSF Board / Ness & Beaully Fisheries Trust	<p>Confirm they are happy with the comprehensive fish survey specification for the EIAR.</p> <p>Advise for post monitoring consent to include an additional survey site further down the Allt Saigh and on the River Moriston.</p>	Direct email (refer to Appendix A).	Noted	N/A
RSPB	Request a detailed Habitat Management Plan (HMP) is included with the EIA Report.	A62	Confirm that an outline HMP will be developed and included within the EIA Report, with final details to be agreed by condition.	N/A
NatureScot	Advise bat surveys should follow latest (2019) guidance.	A34	Consultation has been undertaken to agree approach to bat surveys.	See below.
NatureScot	Confirm that further bat surveys are not required due to low level of activity on site.	Direct email (refer to Appendix A).	Noted	N/A
THC	<p>EIA Report should provide a baseline survey of birds, animals, plants and trees on site.</p> <p>Should assess the impacts on:</p> <ul style="list-style-type: none"> <li>- the nature conservation interests of designated sites.</li> <li>- potential impact on deer.</li> <li>- aquatic interests within local watercourses including downstream interests that may be impacted.</li> <li>- Ground Water Dependent Terrestrial Ecosystems.</li> </ul>	A5	Confirm a detailed ecological and ornithological assessment will be undertaken as part of the EIA.	N/A



## 7. Ornithology

The following comments were received from consultees on the ornithology assessment.

**Table 7.1 - EIA Scoping Opinion –Ornithology**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
RSPB	<p>Recommend scoping in effects on North Inverness Lochs SPA and Loch Knockie and nearby Lochs SPA.</p> <p>Advise that the Proposed Development has the potential to impact upon Slavonian grebe and welcome assessment of Slavonian grebe and golden eagle.</p> <p>Recommend survey work is undertaken for a second breeding season.</p> <p>EIA Report should include details on:</p> <ul style="list-style-type: none"> <li>- Full details of vantage point (VP) work undertaken</li> <li>- Maps showing VPs and viewsheds</li> <li>- Worked example of collision risk calculations</li> <li>- Provision of raw data</li> </ul>	A60	<p>Potential for links to SPA breeding pairs of Slavonian grebe to be assessed further and a full review of all available data and literature will be included in the EIA.</p> <p>Datasets on Slavonian grebe have been obtained from RSPB and the HRSG has been consulted regarding golden eagle. Confirm that both species will be scoped in to the assessment.</p> <p>Second breeding season of survey work was completed August 2020).</p> <p>The Ornithology chapter will be supported by a Technical Appendix that will include all weather (Annex C) and raw data gathered during baseline surveys (Annex D), and collision model outputs (Annex E). Confidential data will be included in a separate Technical Appendix (with separate supporting figures) with a limited distribution. A suite of figures will also support the chapter that will include detail of the</p>	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	Cumulative assessment impacts on species that are sensitive to wind energy developments should be assessed across the Natural Heritage Zone.		VPs and viewsheds utilised.  Cumulative assessments for any features scoped in to the assessment will be reviewed and undertaken where required. It is agreed that the NHZ is the appropriate study area for any cumulative assessments.	
NatureScot	Advise two full years of bird surveys required.	A34	Second year of survey work completed in August 2020.	N/A
	North Inverness Lochs SPA and Loch Knockie and nearby Lochs SPA should be assessed within EIA. Refer to the approach given on Druim Ba Wind Farm.		Noted regarding referring to the approach taken for Druim Ba Wind Far. Potential for connectivity to the North Inverness Lochs SPA and Loch Knockie and Nearby Lochs SPA breeding Slavonian grebe populations to be reviewed further following the conclusion of the 2020 scarce breeding bird surveys.	Further consultation regarding the scope of connectivity with respect to breeding SPA Slavonian grebe to be undertaken following the conclusion of the 2020 scarce breeding bird surveys.
	Advice given relating to confidential appendices.		Confidential data will be included in a separate Technical Appendix (with separate supporting figures) with a limited distribution.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
THC	An assessment of the impacts on birds through collision, disturbance and displacement from foraging / breeding / roosting habitat required for both the Proposed Development site and cumulatively with other proposals. The EIA Report should be clear on the survey methods and any deviations from guidance on ornithology matters.	A6	Confirm that the assessment will consider all potential affects to Important Ornithological Features (IOFs) and cumulative assessments for any IOFs scoped in to the assessment will be reviewed and undertaken where required. The Ornithology chapter will be supported by a Technical Appendix that will include details of all survey methodology and guidance followed (Annex B).	N/A

## 8. Archaeology & Cultural Heritage

The following comments were received from consultees on the archaeology and cultural heritage assessment.

**Table 8.1 - EIA Scoping Opinion –Archaeology & Cultural Heritage**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
HES	<p>Confirm the scope of assessment is appropriate.</p> <p>Provided pre-application advice, recommending the scheduled monuments Levishe Cottage, fort and earthwork, and Urquhart Castle are assessed in the EIA and include visualisations.</p> <p>A detailed ZTV should assist in identifying further assets likely to be impacted.</p> <p>Note that a new Historic Environment Policy for Scotland was adopted in May 2019.</p>	A21	Noted.	Further consultation to be undertaken to confirm viewpoint locations where photomontages may be required.



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
THC	<p>The EIAR needs to identify all designated sites which may be affected by the development either Directly or indirectly.</p> <p>If impacts on setting are likely, visualisations should be provided.</p> <p>Recommend consultation with THC Historic Environment Team (HET) on the scope of assessment.</p>	A8	<p>A detailed archaeological and cultural heritage assessment will be included within the EIA Report.</p> <p>Further consultation with HET.</p>	<p>See below.</p> <p>Further consultation to be undertaken with THC HET to confirm viewpoint locations where photomontages may be required.</p>
THC (HET)	Confirmed that direct impacts can be scoped out and that walkover surveys are not required.	Direct email (refer to Appendix A)	Noted	N/A

## 9. Landscape & Visual

The following comments were received from consultees on the landscape and visual impact assessment.

**Table 9.1 - EIA Scoping Opinion – Landscape & Visual**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Glen Urquhart Community Council	Raise concerns regarding the visibility of the turbines.	A39	The visual impacts of the Proposed Development have been a key consideration during the detailed design process and the impacts will be assessed within the EIA.	Consultation with community councils and local communities is ongoing. Details of all public consultation will be included within the Pre-Application Consultation Report.
NatureScot	<p>Proposed Development will be visible from Glen Affric National Scenic Area (NSA). Advise that this visibility from the circular walk around Loch Affric should be designed out.</p> <p>The proposed turbines are in excess of 150m tall and therefore may legally require to have visible aviation lights fitted. The introduction of lighting, which is likely to be visible over large distances,</p>	A31	<p>Views from the NSA are a key consideration and an assessment of effects on special qualities of the NSA will be conducted. Theoretical visibility from the circular walk around Glen Affric has been designed out.</p>	<p>Consultation is ongoing with NatureScot to confirm viewpoints to be assessed (refer to Appendix B).</p> <p>Further consultation to be undertaken with respect to cumulative, lighting and Wild Land Assessment.</p>



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	<p>could result in significant adverse impacts on the qualities of this wild land area. We advise that proximity activated lighting could mitigate these impacts to a large extent.</p> <p>A Wild Land Assessment should be included within the EIA Report.</p> <p>Design coherence with the existing wind farm should be a key design principle for the proposal. We note at present the proposed turbines do not appear to be compatible in terms of size and scale to those used at the existing wind farm.</p> <p>The EIA should include an assessment of aviation lighting which should include the following:</p> <ul style="list-style-type: none"> <li>- Position and intensity of lighting</li> <li>- ZTV map for nacelle and tower lights</li> <li>- Annotations of turbine lighting positions on all visualisations</li> <li>- A table listing how many lit turbines will be visible from each viewpoint</li> <li>- written assessment</li> <li>- Night-time visualisations from 2 or 3 representative viewpoints</li> </ul> <p>Suggestions for new/amended viewpoints provided.</p>		<p>An assessment of visible lighting effects will be conducted, including an assessment of effects on wild land. Mitigation of potential visible lighting effects will be explored.</p> <p>As noted in the Scoping Report, an assessment of effects on wild land will form part of the main LVIA chapter.</p> <p>Design coherence with the existing turbines has been taken forward as a key design principle.</p> <p>The scope of the lighting assessment will be discussed in future consultation, including viewpoints for low lighting visualisations.</p> <p>Viewpoint suggestions taken on board and consulted on further.</p>	
Strathglass Community Council	Concerned that the Proposed Development will have a substantial visual impact.	A40	The visual impacts of the Proposed Development have been a key consideration during the detailed	Consultation with community councils and local communities is ongoing. Details of all public



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	Request all neighbouring community councils are included as consultees.		design process and the impacts will be assessed within the EIA.  All identified community councils will be consulted.	consultation will be included within the Pre-Application Consultation Report.
THC	<p>Photomontages should be produced to both THC and NatureScot visualisation standards.</p> <p>Request images for presentation within THC Panoramic Digital Viewer.</p> <p>LVIA should include assessment of borrow pits and access tracks.</p> <p>With regards to cumulative wind developments, consultation should also be undertaken with ECU as to scheme which are currently at Scoping Stage as these may have advanced at the same pace as your proposal.</p> <p>Viewpoints should be agreed with THC and micrositied to avoid intervening screening by vegetation.</p> <p>Request specific viewpoints and advise that viewpoints should correspond with those used for cumulative schemes.</p> <p>Request recreational routes are assessed.</p> <p>Noted that cumulative impact will be a significant material consideration.</p> <p>Request a Wild Land Assessment and an Aviation Lighting Impact Assessment.</p>	A4	<p>Visualisations will be produced to NatureScot and THC standards and will be presented in the Panoramic Digital Viewer.</p> <p>All permanent elements of the Proposed Development will be considered in the LVIA, including borrow pits and access tracks.</p> <p>Consultation regarding cumulative sites will include ECU.</p> <p>Viewpoint locations are being agreed with THC and will be micrositied on site to avoid intervening screening by vegetation or other objects, as appropriate.</p> <p>The recreational routes noted by THC have been noted and will be considered in the LVIA.</p> <p>An assessment of visible lighting effects will be conducted,</p>	<p>Further consultation has been undertaken to agree viewpoints with THC and NatureScot (see below and refer to Appendix B).</p> <p>Further consultation to be undertaken with respect to cumulative, lighting and Wild Land Assessment.</p> <p>Cumulative baseline and cut- off date will be agreed with the THC and NatureScot</p>



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	Request proposal should assess the impacts on landscapes designated at a national and local scale.		<p>including an assessment of effects on wild land. Mitigation of potential visible lighting effects will be explored.</p> <p>As noted in the Scoping Report, an assessment of effects on wild land will form part of the main LVIA chapter.</p> <p>The LVIA will assess effects on national and local level designated and protected landscapes.</p>	
THC	Confirmed generally content with the updated list of viewpoints proposed.	Direct email (refer to Appendix B).	Noted.	N/A

## 10. Hydrology & Hydrogeology

The following comments were received from consultees on the hydrology and hydrogeology assessment.

**Table 10.1 - EIA Scoping Opinion – Hydrology & Hydrogeology**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Scottish Water	<p>Note the following:</p> <ul style="list-style-type: none"> <li>- The proposal is within a drinking water catchment where a Scottish Water abstraction is located. It is a relatively large catchment and the activity is sufficient distance from the intake that it is likely to be low risk.</li> <li>- Will not accept any surface water connections into combined sewer system.</li> <li>- The Applicant should identify any potential conflicts with Scottish</li> </ul>	A66	<p>Potential impacts within the drinking water protected area will be assessed within the EIA.</p> <p>Noted.</p> <p>If any potential impacts on Scottish Water assets are identified then the</p>	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	Water assets and contact Asset Impact team directly.		Asset Impact Team will be contacted.	
SEPA	<p>Ask for copy of NVC results to provide detailed advice.</p> <p>Where impacts on the water environment cannot be avoided then justification must be provided.</p> <p>Request plan(s) showing the following:</p> <ul style="list-style-type: none"> <li>- All proposed temporary or permanent infrastructure overlain with all watercourses and lochs.</li> <li>- 50m buffer around all water features.</li> <li>- Detailed layout of proposed mitigation including cut off drains and settlement ponds.</li> <li>- GWDTE locations and distance from excavations.</li> <li>- Location of existing and/or any proposed water abstractions.</li> </ul> <p>Provided reference to relevant regulatory requirements and good practice guidance.</p>	A23	<p>SEPA have been consulted and the NVC data has been shared.</p> <p>A full assessment of all identified hydrological and hydrogeological receptors will be included within the EIA and impacts on these minimised where possible.</p> <p>The assessment will follow all relevant SEPA guidance. Outline drainage strategy/ design information will be provided within the EIA Report, with detailed design to be agreed by condition.</p> <p>Plans and data with the requested detail relating to watercourses, water features, and potential GWDTE will be included within the EIA Report where relevant.</p>	N/A
THC	<p>Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed.</p> <p>Advised to consult with SEPA.</p> <p>EIA Report should identify all water crossings and include a table of watercourse crossings. The table should include details and photography of each watercourse impacted.</p>	A8	<p>Consultation has been undertaken with SEPA as part of the Scoping process.</p> <p>The EIA Report will include a detailed assessment of hydrology and hydrogeology impacts. A water</p>	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	EIA should identify and assess any private water supplies with the potential to be impacted.		crossing schedule will be included in the EIA Report.  A PWSRA will be included within EIA Report if not scoped out.	

## 11. Geology & Soils

The following comments were received from consultees on the geology and soils assessment.

*Table 11.1 - EIA Scoping Opinion –Geology & Soils*

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
The Coal Authority	No comment. Site is outwith defined coalfield.  Do not require to be included in further consultation.	A69	Noted.	No further consultation required.
RSPB	Welcome commitment to site turbines to avoid areas of deep peat and measures to minimise peat disturbance.  Recommend Carbon Calculator is completed.  A suitable area of modified blanket bog should be identified and restored. This should be agreed with the planning authority and in consultation with NatureScot.	A61	Noted.  Confirm that a carbon calculator will be completed.  A Peat Management Plan and Draft Habitat Management Plan will be developed in consultation with key stakeholders.	N/A
SEPA	Would welcome opportunity to comment on Stage 2 peat probing strategy prior to its undertaking.  Request the following: <ul style="list-style-type: none"> <li>- Plan of location, size, depth, dimensions of borrow pits.</li> <li>- Submission must include justification for location of all borrow pits.</li> <li>- Plan of peat depths overlain with all infrastructure.</li> </ul>	A23	SEPA have been consulted over the Stage 2 peat probing strategy.  The EIA Report will include details of all proposed borrow pits.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	<ul style="list-style-type: none"> <li>- Table detailing excavated quantities of peat and details of re-use.</li> </ul> <p>Provided reference to relevant regulatory requirements and good practice guidance.</p>			
NatureScot	<p>The EIA should demonstrate that any significant impacts on Class 1 or 2 peatlands have been substantially overcome by siting, design or other mitigation.</p> <p>EIA should include a Peatland Management Plan (PMP) and Habitat Management Plan (HMP).</p>	A34	<p>Further survey and assessment are required to establish extent of active priority peatland habitat and further consultation with NatureScot to be undertaken to agree methodology and acceptability of proposed impact in terms of national interest and agree acceptable mitigation.</p> <p>Confirm that an outline HMP and PMP will be included within the EIA Report.</p>	Further consultation required with NatureScot
THC	<p>EIA should describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil.</p> <p>Should include information on proposed borrow pits including location, size and nature.</p> <p>EIA should include:</p> <ul style="list-style-type: none"> <li>- A Peat Slide Risk Assessment in accordance with Scottish Government guidance.</li> <li>- Detailed map of peat depth.</li> <li>- Assessment on the impact on peat, including peat probing for all areas where development is proposed</li> </ul>	A9	<p>Noted. The EIA Report will include details of all proposed borrow pits and will include assessment of the impacts on peat and a Peat Slide Risk Assessment.</p>	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	<p>including micrositing allowance.</p> <ul style="list-style-type: none"> <li>- Carbon balance calculations.</li> </ul>			

## 12. Noise & Vibration

The following comments were received from consultees on the noise and vibration assessment.

*Table 12.1 - EIA Scoping Opinion –Noise & Vibration*

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
THC	<p>Noise 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.</p> <p>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, including predicted and consented levels. The cumulative assessment should include:</p> <ul style="list-style-type: none"> <li>- Map of cumulative wind farm developments and noise sensitive properties.</li> <li>- Table of figures of: <ul style="list-style-type: none"> <li>o Predicted levels at each receptor</li> <li>o Maximum levels based on consented wind farm developments at receptors (if a reduction is made for controlling property or another reason this should be made clear).</li> <li>o Predicted levels from cumulative developments at receptors</li> <li>o Cumulative levels at receptors</li> </ul> </li> </ul>	A6	<p>Noted.</p> <p>A detailed noise assessment will be included within the EIA Report and will be in accordance with relevant guidance.</p>	<p>Consultation is ongoing with THC Environmental Health Officer.</p>



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	<ul style="list-style-type: none"> <li>- Outline of mitigation scheme (if required).</li> </ul> <p>Monitoring locations should be agreed with THC Environmental Health Officer.</p> <p>The developer/contractor should employ the best practicable means to reduce the impact of noise from construction activities.</p>			

## 13. Traffic & Transport

The following comments were received from consultees on the traffic and transport assessment.

*Table 13.1 - EIA Scoping Opinion –Traffic & Transport*

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Fort Augustus & Glen Moriston Community Council	<p>Have serious concerns over another major construction development and short timescale from the construction of the operational Bhlaraidh Wind Farm.</p> <p>Concerns over two years of disruption, noise, increased construction traffic and the impact of a minimum of 150+ abnormal traffic movements through the area.</p>	A20	<p>Concerns are noted. The EIA will include a detailed traffic and transport assessment and will consider cumulative impacts with other developments. A Traffic Management Plan will set out how construction traffic and potential impacts will be managed.</p>	<p>Consultation with community councils and local communities is ongoing. Details of all public consultation will be included within the Pre-Application Consultation Report.</p>
Transport Scotland	<p>Content that no further detailed assessment is required in relation to the trunk road network if traffic flow thresholds in the IEMA guidelines are not exceeded.</p> <p>Require an Abnormal Loads Assessment is carried out. This should identify key pinch points on the trunk road network. A swept path</p>	A72	<p>Noted.</p> <p>Details of the full transport assessment, including Abnormal Loads Assessment and swept path analysis will be included within the EIA Report.</p>	<p>Consultation to be undertaken with Trunk Road Area Manager to agree TMP.</p> <p>Further consultation is also ongoing with TS regarding the scope of the Transport</p>



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	analysis should be undertaken.  Traffic Management Plan (TMP) should be discussed and agreed with Trunk Road Area Manager.			Assessment and traffic data.
THC	Recommend consultation with Transport Scotland.  EIA Report will require a Transport Assessment. This should include the following: <ul style="list-style-type: none"> <li>- identify all roads likely to be affected by the development.</li> <li>- Baseline condition of roads and traffic flows</li> <li>- Details and impacts of traffic resulting from Proposed Development.</li> <li>- Cumulative impacts</li> <li>- Proposed mitigation measures.</li> </ul> EIA may need to assess air quality.	A9	Consultation has been undertaken with Transport Scotland as part of the scoping process.  The EIA Report will include a detailed Transport Assessment.  THC confirmed through further consultation that air quality can be scoped out.	N/A

## 14. Socio-economics, Recreation & Tourism

The following comments were received from consultees on the socio-economics, recreation and tourism assessment.

**Table 14.1 - EIA Scoping Opinion –Socio-economics, Recreation & Tourism**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
British Horse Society	No objections. Welcome the mention of horse riding.	A41	Noted.	N/A
Cairngorms National Park Authority	No comments to make on Proposed Development.	A46	Noted.	N/A
Inverness Chamber of Commerce	In support of proposal and the socio-economic benefits.	A53	Noted.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ScotWays	Highlight local route HI71 within proximity to Proposed Development.	A63	Noted. Local access will be assessed within the EIA.	N/A
THC	<p>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.</p> <p>Request Outdoor Access Plan is submitted with EIA Report. EIA Report should include a plan detailing the following:</p> <ul style="list-style-type: none"> <li>- Existing public rights of way</li> <li>- Proposed public access provision during construction and operation</li> <li>- Impacts on core paths and proposed mitigation.</li> </ul>	A11	<p>Noted. The EIA will assess the impact of the Proposed Development on socio-economic, tourism and recreational receptors, and will include details on proposed mitigation.</p> <p>Access to be assessed within the application, with an Outdoor Access Plan to be agreed with THC access officer post consent.</p>	Noted.
Visit Scotland	Advise an independent tourism impact assessment should be carried out.	A70	Confirm tourism and recreation will be included within the socio-economic assessment.	N/A

## 15. Other Issues

The following comments were received from consultees on assessment of other issues.

**Table 15.1 - EIA Scoping Opinion –Other Issues**

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
BT	<p>Proposal should not cause interference to BT's current and presently planned radio network.</p> <p>Note that central point of site is approx. 4-5 km from fixed radio links and they</p>	A43	Noted.	Will be updated with final proposed turbine locations.



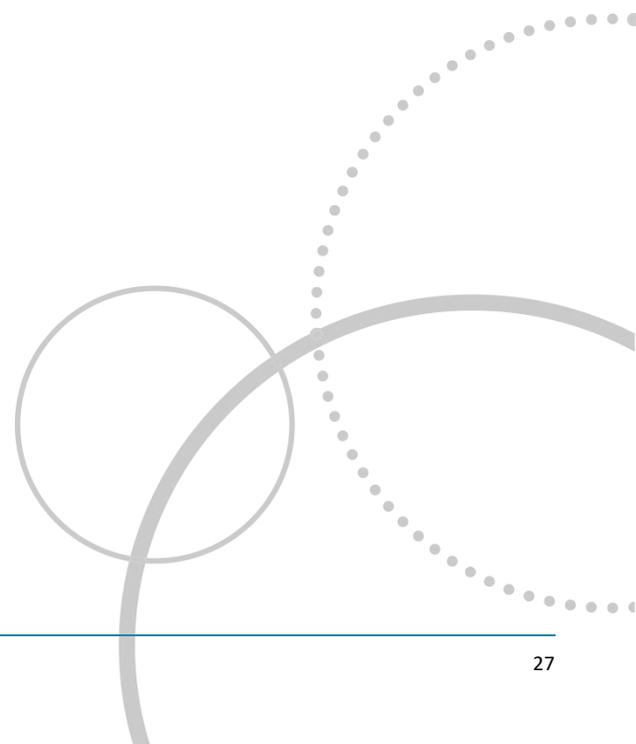
Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	require 100m minimum clearance to link path.			
Crown Estate Scotland	No comment. Assets of the Crown Estate Scotland are not affected.	A47	Noted.	N/A
DIO	Has no concerns.  Ministry of Defence (MoD) request the development be fitted with aviation safety lighting in accordance with Civil Aviation Authority, Air Navigation Order 2016.	A48	Confirm that aviation safety lighting will be fitted to turbines as they are above 150 m in tip height. This will be assessed within the LVIA.	Will be updated with final proposed turbine locations.
Highlands & Islands Airports Limited (HIAL)	Noted that the development falls within the safeguarded area for Inverness Airport.  Turbines have the potential to impact on radar.  Will work with the developer towards a resolution.	A52	Impact on aviation radar has been taken into consideration during the detailed design process. The Proposed Development will not be visible to HIAL radar infrastructure.	N/A
JRC	Proposal is cleared with respect to radio link infrastructure operated by the local electricity utility and Scotia Gas Networks.	A55	Noted.	Will be updated with final proposed turbine locations.
Met Office	Confirmed that proposal is not within any consultation zones.	Direct email (refer to Appendix A).	Noted.	No further consultation required.
NATS Safeguarding	Confirm the proposal does not conflict with safeguarding criteria.	A59	Noted.	Will be updated with final proposed turbine locations.
Scottish Forestry	Confirm that forestry can be scoped out of the EIA, and that no assessment of felling or compensatory planting is required.	A76	Noted. Forestry, felling and compensatory planting are scoped out.	N/A
THC	EIA Report should demonstrate telecommunication and aviation radar interests they	A11	The EIA Report will include assessment of telecommunications, aviation and radar.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	<p>have identified and the outcomes of consultations with relevant authorities. Noted that Shadow Flicker does not require a detailed assessment.</p> <p>EIA Report should indicate all areas of woodland to be felled and details of compensatory planting. The EIA should address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind.</p> <p>Depending on the proximity of the working area to houses etc. the Applicant may be required to submit a scheme for the suppression of dust during construction.</p>		<p>Scottish Forestry has confirmed that a detailed forestry assessment can be scoped out and that a compensatory planting plan is not required.</p> <p>THC have since confirmed that air quality can be scoped out of the EIA.</p>	
THC	Confirmed that air quality can be scoped out.	Direct email (refer to Appendix A).	Noted.	N/A



# Appendix A – Further Consultation



[REDACTED]

[REDACTED]

Our ref: FL/15-7

June 8th 2020

Dear [REDACTED]

## **BHLARAI DH WIND FARM EXTENSION, INVERMORISTON**

Marine Scotland Science (MSS) received correspondence from Dr Jon Watt who is advising SSE in relation to fish surveys for the proposed Bhlaraidh wind farm extension.

MSS welcomes the approach of [REDACTED] that the existing fish data, which are out of date and do not include all the watercourses within the proposed development area, should be considered inadequate for the purposes of the Environmental Impact Assessment (EIA) and that additional fish data should be collected which are specific to the proposed development. A fish habitat survey will be carried out within the Allt Saigh catchment, which drains most of the proposed development area, to determine appropriate mitigation measures and the location of electrofishing survey sites. [REDACTED] states that the only substantial stream in the part of the River Moriston catchment, which also lies within the boundary of the proposed development area, is unlikely to support fish populations due to low water levels as a result of abstraction.

MSS welcomes the proposal of a fish monitoring programme which will be informed by the findings of the electrofishing and habitat surveys. We recommend that an integrated water quality and fish population monitoring programme is established which follows MSS guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout->

[Coarse/Freshwater/Research/onshoreren](#)) and provides full details regarding the methodology, parameters measured, data analysis, reporting and a map outlining the proposed electrofishing sites (including control sites) along with the proposed location of the turbines and associated infrastructure. We also recommend that regular visual inspections of all watercourses are carried out by an appointed Ecological Clerk of Works as outlined in the above guidelines.

MSS notes that the initial electrofishing surveys, carried out to inform the EIA, will be semi-quantitative. MSS recommends that fully quantitative surveys are conducted for monitoring purposes, to allow a more accurate comparison of fish densities before construction, during construction and after construction and a comparison of fish densities between sites which could potentially be impacted from the proposed development and control sites, sites which are unlikely to be impacted.

The results of the proposed surveys should be presented in the EIA report along with the proposed mitigation measures and details of the proposed water quality and fish population monitoring programme.

Kind regards,

████████████████████

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 20 May 2020 12:05  
**To:** [REDACTED]  
**Subject:** RE: Bhlaraidh wind farm extension

**Categories:** Bhlaraidh

Hi [REDACTED]

Many thank for consulting me - I can confirm that we are happy with the comprehensive fish survey specification for the EIAR/Environmental Statement.

Looking ahead to post consent monitoring, it would be advisable to include an additional survey site further down the Allt Saigh at its confluence with Loch Ness. We suspect that the accessible reaches in this area may be utilised by spawning salmon and ferox trout. Likewise, an addition site on the River Moriston would be advisable given its importance for salmon and freshwater pearl mussel.

Hope this makes sense.

All the best

[REDACTED]

---

**From:** [REDACTED] >  
**Sent:** 20 May 2020 09:14  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Bhlaraidh wind farm extension

To: [REDACTED]

Re: Bhlaraidh Wind Farm, proposed extension

[REDACTED]

You will be aware of the proposed extension to the Bhlaraidh Wind Farm, near Invermoriston. A turbine layout is included as an Appendix in the attached document and further details can be found at the Energy Consent Unit website.

SSE and the lead consultant, ITP Energised, have asked Waterside Ecology to prepare a fish survey specification for the site. The survey would be conducted to provide information on fish in support of the Environmental Impact Assessment Report for the site.

A proposed survey design is attached. Marine Scotland Science has requested that the developer contact the local Fishery Board and Trust to ensure that any fish survey best reflects local knowledge and the needs of local fishery management organisations. I'd be very grateful, therefore, if you could cast an eye over the attached and let me know whether:

- a) It is likely to satisfy the Board's/Trust's expectations in relation to fish data for the EIAR/Environmental Statement for the Bhlairaidh the site; and
- b) The Board and Trust consider that any changes or additions are required to the proposed specification.

The rationale behind the proposal is set out in the attached, but if anything is unclear or you'd like to talk it over, feel free to give me a ring.

Thanks and best wishes



Virus-free. [www.avast.com](http://www.avast.com)

[REDACTED]

---

**From:**

[REDACTED]  
April 2020 16:30

**To:**

**Subject:**

RE: Bhlaraidh Wind Farm Extension Bat Data

**Categories:**

Bhlaraidh

Hi [REDACTED]

Many thanks for your response regarding the Bhlaraidh Wind Farm Extension and for confirming no further bat surveys are required. The survey results were based on the detectors recording for the entire duration of the deployment dates.

I'll make sure I direct any future correspondence to you but please let me know if you need anything else from me in the interim.

Best regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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---

**From:** [REDACTED]

**Sent:** 22 April 2020 14:50

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Bhlaraidh Wind Farm Extension Bat Data

Dear [REDACTED]

Thank you for getting in touch regarding Bhlaraidh Wind Farm Extension. Please direct future correspondence on Bhlaraidh Wind Farm to myself.

We have reviewed the bat survey report you have provided us with.

With regards to the survey effort we note that the minimum requirements of the bat survey guidance have not been met, both in terms of the duration of surveys (2 days rather than the minimum required 10 for spring season) and in

terms of the minimum number of detectors deployed (at times 7 rather than the minimum required 14). However given the nature of the site, the survey results and our understanding of the area we agree that no additional bat surveys are required to inform the EIA report.

Could you please provide clarification with regards to the actual number of days the detectors were operational? The report notes deployment dates, e.g. 30<sup>th</sup> May to 25<sup>th</sup> June, were the survey results based on detectors recording for the entire duration of these deployment dates?

[Redacted]

[Redacted]

\* tha seòladh puist-d ùr agam / I have a new email address - [Redacted]

[Redacted]

---

**From:** [Redacted]

March 2020 09:42

**To:** [Redacted]

**Subject:** Bhlaraidh Wind Farm Extension Bat Data

Dear [Redacted]

[Redacted] on behalf of SSE Renewables Developments (UK) Ltd for the proposed Bhlaraidh wind farm extension near Invermoriston in the Highlands. Ramboll have been involved in the ecology work, including the collection of habitat and protected species data. We are seeking confirmation from SNH on the suitability of our bat survey effort and the gathered data in terms of undertaking an Environmental Impact Assessment. Please see the attached letter for full details of the survey methodology and results of a programme of static bat surveys undertaken between May and October 2019. I appreciate this is a time of uncertainty due to the recent change in working practices following the government's recent announcement on coronavirus measures but would it be possible to have a response from you by mid-April?

Thank you for your time. I look forward to hearing from you.

Best regards,

[Redacted]

[Redacted]

[Redacted]

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From 1 May 2020, SNH will be rebranding and changing its name to NatureScot.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 April 2020 16:33  
**To:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension

Hi [REDACTED]

Many thanks for sending the details for this proposal. I can confirm I would be happy for the direct impacts to Cultural Heritage to be scoped out of the EIA. In addition, I do not believe that the potential for unrecorded historic environment features is such that would justify walkover survey; so this can also be scoped out.

Please let me know if you need anything further at this stage.

Kind [REDACTED]  
Kirsty

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 08 April 2020 15:08  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Bhlaraidh Extension

Hi [REDACTED]

Thanks for the speaking to me just now.

Please see attached the site boundary for Bhlaraidh Extension as discussed. Scoping Opinion also available here: <https://www.energyconsents.scot/ApplicationDetails.aspx?T=9> If you require further information.

As discussed if you can confirm whether consideration of direct impacts, and a walkover survey, can be scoped out of the EIA that would be very helpful.

Best,

Vicky

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[Redacted]

**From:**

[Redacted]

[Redacted]

22 August 2019 16:28

**To:**

[Redacted]

[Redacted]

RE: BHLARAI DH WIND FARM EXTENSION

Dear [Redacted]

Thanks for checking if the Met Office need to be consulted. I can confirm that this proposal is not in any Met Office consultation zone.

Kind regards

[Redacted]

[Redacted]

[REDACTED]

---

**From:** [REDACTED]  
[REDACTED] 07 February 2020 12:00  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Wind Farm Extension: Air Quality Assessment

**Categories:** Bhlaraidh

Hi [REDACTED]

Apologies for not getting back to you sooner.

I would agree that based upon the likely impacts that Air pollution can be screened out. However, I would request that the mitigation proposed during the construction period, is still included in the Schedule of Mitigation.

Kind Regards,

Simon

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 January 2020 16:52  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Bhlaraidh Wind Farm Extension: Air Quality Assessment

Dear [REDACTED]

Thank you for your Scoping Response to the ECU with respect to the proposed Bhlaraidh Wind Farm Extension proposal.

With regards to air quality I would like to highlight that air quality assessment are typically undertaken following the Institute of Air Quality Management (IAQM) Land Use Planning and Development Control: Planning for Air Quality guidance (IAQM, 2017).

**Construction Traffic**

The IAQM sets out indicative criteria for requiring an air quality assessment:

The development will:	Criteria to Proceed to an Air Quality Assessment
1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight).	A change of LDV flows of: - more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an Air Quality Management Area (AQMA). - more than 500 AADT elsewhere.
2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight).	A change of HDV flows of: - more than 25 AADT within or adjacent to an AQMA. - more than 100 AADT elsewhere.

The site is not located within an Air Quality Management Area and the anticipated traffic flows for LDVs and HDV are less than the criteria outlined above.

We will provide full details of the anticipated traffic flows within the EIA Report.

**Operation Traffic**

During operation there will be approximately one vehicle a week visiting the site, which is less than the criteria outlined above.

**Construction Dust**

Construction activities (such as borrow pit works) have the potential to generate dust during dry spells, which may adversely affect local air quality. Given the scale and nature of construction activities and given the distance between construction areas and the nearest residential properties, it is considered that dust from construction is unlikely to cause a nuisance.

Any emissions/dust created during the construction of the development would be controlled through legislation (e.g. Pollution Act) and standard best practice (e.g. as outlined by Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction ) which would be detailed in the Construction Environmental Management Plan (CEMP). We anticipate that the requirement to produce, submit and abide by the CEMP will be a condition of the consent.

**Operational Emissions**

There are no combustion processes associated with the operation of the development and therefore no assessment of operational effects is required.

Based on the above we propose that an air quality assessment is not required for the Bhlaraidh Wind Farm Extension and can be scoped out of the EIA.

Please can you confirm that you agree that air quality should be scoped out of the EIA?



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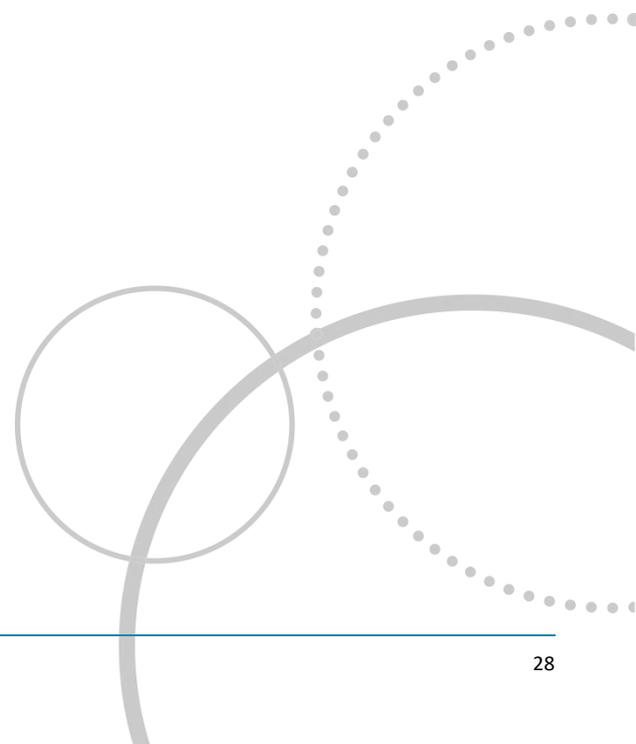
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# Appendix B – Proposed LVIA Viewpoints



Our Ref.: 119009-L-SNH2-1.0.0

Date : 12.06.20

Scottish Natural Heritage  
Silvan House  
3<sup>rd</sup> Floor East  
231 Costorphine Road  
Edinburgh  
EH12 7AT

FAO : [REDACTED]

Dear [REDACTED]

## **Bhlaraidh Wind Farm Extension: LVIA Viewpoints (Further Consultation June 2020)**

Following on from our LVIA Viewpoint consultation of October 2019<sup>1</sup>, we are writing to confirm the proposed Viewpoints (VPs) for Bhlaraidh Wind Farm Extension LVIA.

Since October 2019, some small amendments and clarifications have been made to the Proposed Development (reference Layout SSE DL03), and consequently to the VPs, as detailed in the attached document. A list of proposed viewpoints is appended to this letter (*119009-N-VP2-1.0.0*), with a viewpoint plan (*119009-D-VPC2-1.0.0*).

The key changes are as follows:

- As a result of the amended turbine layout for the Proposed Development, theoretical visibility has now been removed from the circular path (core path) around Loch Affric. **Scoping VP 8** was located on this path, so we propose to omit this VP from the assessment.
- Although theoretical visibility has been removed from the circular path around Loch Affric, there are some areas of theoretical visibility on hill slopes and elevated areas. Therefore, **VP 20** (Path north of Loch Affric; previously **SNH2** in post-scoping consultation) and **VP 21** (Toll Creagach; previously **SNH3** in post-scoping consultation) are included to illustrate views from elevated locations in the Glen Affric NSA.
- In the Pre-Application Advice Pack (PAAP), a VP was requested to illustrate “routes along the north side of Loch Affric and Loch Beinn A’Mheadhoin within the Glen Affric NSA”. We suggest **VP 19** is located on a mountain track (located north of the removed **Scoping VP 8**), near the junction with the core path, at approximately 214770, 823054 to illustrate the theoretical visibility from this location.
- In the October 2019 consultation, it was noted that some VPs could be excluded from the LVIA if the Proposed Development turbines were to be under 150m tip height, due to the size of study area. However, as the Proposed Development will now comprise turbines that will be over 150m to tip, we

<sup>1</sup> See letter *119009-L-SNH1-1.0.0*; drawing *119009-D-VPC-1.0.0* and list of viewpoints in document *119009-N-VP-1.0.0*.

confirm that the **VP 23** and **VP 24** (previously **THC1** and **THC2** in post-scoping consultation) will be included in the LVIA to illustrate distant views of the Proposed Development.

- All other VPS in the attached document remain as they were in our October 2019 consultation, but with some updated VP numbering. We have not identified any other areas of 'new' theoretical visibility occupied by the current Proposed Development (Layout SSE DL03) that would require other VPs.

This letter is being sent to Scottish Natural Heritage, The Highland Council and Energy Consents Unit.

Further consultation regarding other LVIA matters raised in your Scoping letter will be addressed separately.

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

Kind regards,



**Key**

- Proposed Development 180m Tip Height Turbine (SSE Design Layout 03)
- 20 km Detailed Study Area
- 45 km Study Area

**Zone of Theoretical Visibility (ZTV)**

- 1 - 5 Turbines
- 6 - 10 Turbines
- 11 - 15 Turbines
- 16 - 18 Turbines

*The ZTV had been run on a bare ground model, based on Terrain 5 Digital Terrain.*

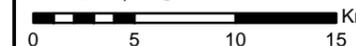
**Designated and Protected Landscapes**

- Cairngorm National Park (CNP)
- National Scenic Area (NSA)
- Gardens and Designed Landscapes (GDL)
- Wild Land Area (WLA)
- Highlands Special Landscape Area (SLA)

**Proposed Viewpoints**

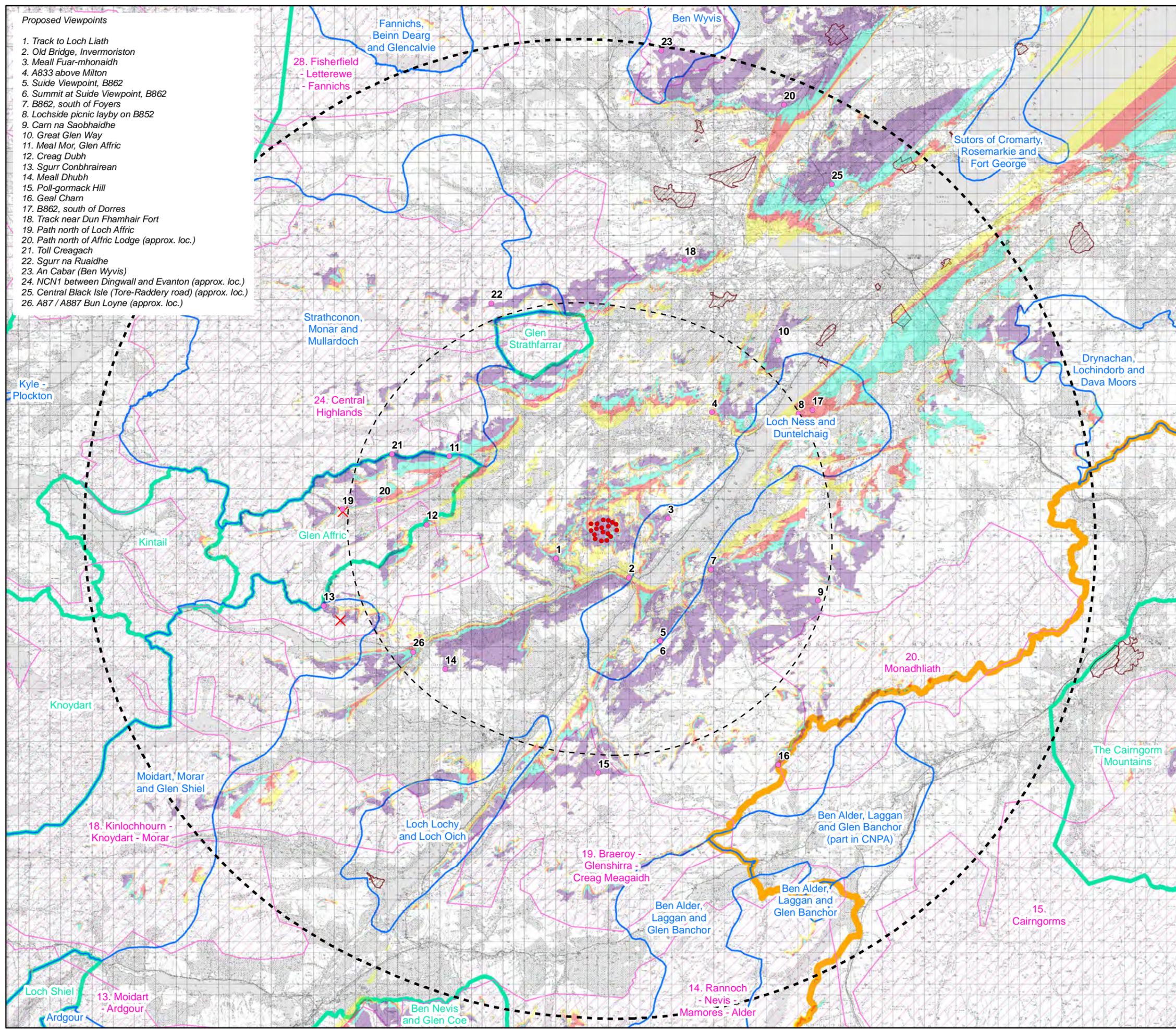
- Proposed
- ✗ Removed

Scale 1:350,000@ A3



**Viewpoint Consultation (June 2020)**

**Bhlaraidd Extension Wind Farm Consultation**



- Proposed Viewpoints**
1. Track to Loch Liath
  2. Old Bridge, Invermoriston
  3. Meall Fuar-mhonaidh
  4. A833 above Milton
  5. Suide Viewpoint, B862
  6. Summit at Suide Viewpoint, B862
  7. B862, south of Foyers
  8. Lochside picnic layby on B852
  9. Carn na Saobhaidhe
  10. Great Glen Way
  11. Meal Mor, Glen Affric
  12. Creag Dubh
  13. Sgurr Conbhrairean
  14. Meall Dhubbh
  15. Poll-gormack Hill
  16. Geal Charn
  17. B862, south of Dorres
  18. Track near Dun Fhamhair Fort
  19. Path north of Loch Affric
  20. Path north of Affric Lodge (approx. loc.)
  21. Toll Creagach
  22. Sgurr na Ruaidhe
  23. An Cabar (Ben Wyvis)
  24. NCN1 between Dingwall and Evanton (approx. loc.)
  25. Central Black Isle (Tore-Raddery road) (approx. loc.)
  26. A87 / A887 Bun Loyne (approx. loc.)

## Proposed Viewpoints (June 2020)

Table to be read in conjunction with drawing 119009-D-VPC2. This table and list of VPs relates the the layout SSE DL03.

### Proposed Viewpoint List

VP No.				Location	OS Grid Reference	Reason for Selection / Exclusion
Further VP Consultation (June 2020)	Post-Scoping Consultation (Oct 2019)	Scoping Report (July 2019)	Bhlaraidh Wind Farm LVIA (2012)			
VP 1	VP 1	VP 1	VP 1	Track to Loch Liath	235065, 818396	Illustrative of open, very close-proximity view, from track on the site.
VP 2	VP 2	VP 2	Near to VP 2	Old Bridge, Invermoriston	241968, 816573	Representative of close-proximity views from Invermoriston, taken from Old Bridge.
VP 3	VP 3	VP 3	VP 3	Meall Fuar-mhonaidh	245685, 822183	Illustrative of elevated views from popular local hill summit on the north-western side of Loch Ness, within Loch Ness and Duntelchaig SLA.
VP 4	VP 4	VP 4	-	A833 above Milton	249836, 832259	Illustrative of new visibility, representative of elevated views from the A833 above Milton. <i>[Requested in PAAP from A833 above Milton.]</i>
VP 5	VP 5a	VP 5	VP 5	Suidhe Viewpoint, B862	244965, 810550	Illustrative of elevated view from roadside Viewpoint marked on OS maps, on General Wade's military road, within Loch Ness and Duntelchaig SLA.
VP 6	VP 5b (THC5)	-	-	Summit by Suidhe Viewpoint, B862	tbc	Illustrative of elevated view from popular summit near Suidhe Viewpoint carpark. <i>[Requested by THC in their Scoping Response.]</i>
VP 7	VP 6	VP 6	VP 6	B862 south of Foyers	249744, 817318	Illustrative of views from the B862 road opposite the site.
VP 8	VP 7	VP 7	Near to VP 7	Lochside picnic layby on B852	258078, 832144	Illustrative of worst-case low-level views from shores of Loch Ness, on B-road, within Loch Ness and Duntelchaig SLA.
-	VP 8	VP 8	-	Path north of Loch Affric	214824, 822851	<u>Excluded</u> due to removal of theoretical visibility here and along core path by Loch Affric. Originally this was chosen to be illustrative of views from core path to the north of Loch Affric, at junction with mountain track, situated within Glen Affric NSA and Central Highlands WLA. <i>[Requested in PAAP to illustrate views from route along north side of Loch Affric within NSA]</i>

VP No.				Location	OS Grid Reference	Reason for Selection / Exclusion
Further VP Consultation (June 2020)	Post-Scoping Consultation (Oct 2019)	Scoping Report (July 2019)	Bhlaraidh Wind Farm LVIA (2012)			
VP 9	VP 9	VP 9	VP 9	Carn na Saobhaidhe	259930, 814395	Illustrative of elevated views from popular corbett summit on southern side of Loch Ness.
VP 10	VP 10	VP 10	VP 10	Great Glen Way	256115, 839076	Illustrative of elevated views from the Great Glen Way.
VP 11	VP 11	VP 11	VP 11	Meall Mor, Glen Affric	224908, 828076	Illustrative of elevated views from local high point within Central Highlands WLA, on northern boundary of the Glen Affric NSA and southern boundary of the Monar and Mullardoch SLA.
VP 12	VP 12	VP 12	VP 12	Creag Dhubh	222756, 821621	Illustrative of elevated view from hilltop within WLA, with views north across Glen Affric NSA.
-	-	VP 13	Near to VP 13	Carn Ghluasaid	214586, 812511	<u>Excluded and relocated</u> after Scoping comments from SNH to new VP13/ SNH1 location. Original location was illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA.
VP 13	VP 13 / SNH1	-	-	Sgurr nan Conbhrairean	212990, 813896	Illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA; and on the edge of the Glen Affric NSA. <i>[Requested by SNH in their Scoping Response instead of Scoping VP 13.]</i>
VP 14	VP 14	VP 14	VP 14	Meall Dubh	224539, 807889	Illustrative of elevated view from corbett path, by Millenium Wind Farm.
VP 15	VP 15	VP 15	VP 15	Poll-gormack Hill	239064, 798038	Illustrative of elevated mid-range views from summit within Braeroy-Glenshirra-Creag Meagadh WLA, with views across the Corrieyarrick Pass.
VP 16	VP 16	VP 16	VP 16	Geal Charn	256144, 798772	Illustrative of elevated views from Munro summit, on western boundary of CNP and near the boundary of the Monadhliath WLA.
VP 17	VP 17	VP 17	VP 17	B862 south of Does	259372, 832476	Illustrative of elevated view across Loch Ness from minor B-road, within Loch Ness and Duntelchaig SLA.
VP 18	VP 18	VP 18	VP 18	Track near Dun Fhamhair fort	247258, 846682	Illustrative of longer range views from walking route near Beauly.
VP 19	-	-	-	Path north of Loch Affric	214770, 823054	Illustrative of worst-case low-level views from mountain track to the north of Loch Affric, near junction with core path, situated within

VP No.				Location	OS Grid Reference	Reason for Selection / Exclusion
Further VP Consultation (June 2020)	Post-Scoping Consultation (Oct 2019)	Scoping Report (July 2019)	Bhlaraidh Wind Farm LVIA (2012)			
						Glen Affric NSA and Central Highlands WLA. No views from circular Core Path around Loch Affric, but very small area of theoretical visibility on this nearby route. <i>[Close to Scoping VP 8 (now removed) and included to illustrate views from route along north side of Loch Affric within NSA, which was requested in PAAP]</i>
VP 20	SNH2	-	-	Path north of Affric Lodge (name tbc)	218260, 823956 (tbc on site)	Illustrative of elevated point on path north of Affric Lodge, on slopes of Am Meallan hill, within the Central Highlands WLA and Glen Affric NSA. <i>[Requested by SNH in their Scoping Response.]</i>
VP 21	SNH3	-	-	Toll Creagach	219454, 828289	Illustrative of elevated views from a Munro on the edge of the Glen Affric NSA and Strathconon, Monar and Mullardoch, within the Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i>
VP 22	SNH4	-	-	Sgurr na Ruaidhe	228902, 842609	Illustrative of elevated views from a Munro within the Glen Strathfarrar group of hills and views over the Glen Strathfarrar NSA. It is also located within the Strathconon, Monar and Mullardoch SLA and Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i>
VP 23	THC1	-	-	An Cabar (Ben Wyvis) (name tbc)	245032, 866581 (tbc on site)	Illustrative of distant elevated views from hill top located in Rhiddoroch-Benn Dearg-Ben Wyvis WLA and Ben Wyvis SLA. <i>[Requested by THC in their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development]</i>
VP 24	THC2	-	-	NCN1 Between Dingwall and Evanton	256687, 861447 (tbc on site)	Illustrative of distant views from national cycle route in coastal location. <i>[Requested by THC in their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development.]</i>
VP 25	THC3	-	-	Central Black Isle (on the road between Tore and	261221, 853906 (tbc on	Illustrative of distant views from rural settled area. <i>[Requested by THC in their Scoping Response.]</i>

VP No.				Location	OS Grid Reference	Reason for Selection / Exclusion
Further VP Consultation (June 2020)	Post-Scoping Consultation (Oct 2019)	Scoping Report (July 2019)	Bhlaraidh Wind Farm LVIA (2012)			
				Raddery)	site)	
VP 26	THC4	-	-	A87 / A887 Bun Loyne	221483, 809518 (tbc on site)	Illustrative of views from A road near Bun Loyne, Glen Moriston. <i>[Requested by THC in their Scoping Response.]</i>

[REDACTED]

---

**From:** [REDACTED]

12 June 2020 16:30

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:**

RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (THC)

Hi [REDACTED]

Having reviewed the attached, I am generally content with the viewpoints proposed. Given the scale of the turbines it would be important to understand the visibility in relation to aviation lighting as well so if you can please consider which viewpoints will be accompanied by visualisations for hours of darkness as well.

When it comes for finalised siting of viewpoints for photography purposes please ensure that due consideration is given to intervening vegetation, fences, buildings etc.

Kind Regards,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 12 June 2020 16:15

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Bhlaraidh Extension - LVIA VP Consultation (June 2020) (THC)

Dear [REDACTED]

We wish to consult further with you regarding the LVIA Viewpoints for Bhlaraidh Wind Farm Extension, please see attached letter, drawing and table.

Kind regards,

[REDACTED]

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[REDACTED]

*Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)*

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