

Appendix 3.2 Scoping Opinion



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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion On Behalf Of Scottish Ministers Under The
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Bhlaraidh Wind Farm Extension
SSE Generation Ltd**

2 September 2019

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to SSE Generation Limited a company incorporated under the Companies Acts with company number 02310571 and having its registered office at No 1 Forbury Place, 43 Forbury Road, Reading, United Kingdom RG1 3JH (“the Company”) in response to a request dated 12 July 2019 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Bhlaraidh Wind Farm Extension (“the proposed development”). The request was accompanied by a scoping report.

1.2 The proposed development is an extension to the existing Bhlaraidh Wind Farm and would be located adjacent to it in the Glenmoriston Estate, near Invermoriston. The proposed development is solely within the planning authority of The Highland Council.

1.3 The proposed development is anticipated to comprise of up to 20 turbines, with a maximum blade tip height of 180 metres including associated infrastructure, grid technologies including battery storage with a combined installed capacity of greater than 50MW (approximately 50-100MW).

1.4 In addition to the proposed development there will be ancillary infrastructure including:

- Turbine foundations;
- Crane hardstandings;
- On-site access tracks between turbines and from the point of access to the turbines;
- Underground cabling between the turbines;
- On-site substation and maintenance building with welfare facility;
- Temporary construction compound(s), laydown area(s) and concrete batching plant;
- Compound for potential battery storage; and
- Permanent meteorological mast(s).

Alongside the existing access roads, opportunities to reopen Operational Development borrow pits and utilize existing laydown areas, will be incorporated into the site layout design where feasible. A feasibility assessment will be undertaken to determine if the Operational Development’s substation can be utilised, or if extension of it is achievable, for the Proposed Development.

1.5 The Company indicates at section 3.8 of the scoping report that at the end of the operational lifespan, decommissioning will take place and turbines will be removed. The operational life of the proposed development is not stated within the Scoping Report by the applicant.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between ITP Energised (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 17 July 2019. The consultation closed on 09 August 2019. Extensions to this deadline were granted to The Highland Council, SNH and Highlands and Islands Airport. The Scottish Ministers also requested responses from their internal advisors Marine Scotland, Transport Scotland and Scottish Forestry. A full list of consultees is set out at **Annex A**.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 No responses were received from: Beaulieu DSFB; CAA; Friends of the Earth (Scotland); Highland and Islands Enterprise; Mountaineering Scotland; Ness and Beaulieu Fisheries Trust; Ness DSFB; OFCOM; Scottish Canoe Association; Scottish Council for Development and Industry; Scottish Wildlife Trust; Scottish Wild Land Group and; WWF (Scotland).

2.5 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.

2.6 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.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with The Highland Council, within whose area the proposed development would be situated, North Ayrshire Council, Scottish Natural Heritage, Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 17 July 2019 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to The Highland Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at **2.3** on **page 4** of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 The proposed development set out in the Scoping Report refers to wind turbines, and grid 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

3.8 The Company requires to fully assess all effects of each generating station proposed and the Company should engage with the ECU to discuss further the multiple technologies proposed within the development.

3.9 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any 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.

3.10 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.

3.11 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide 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), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures.

3.12 As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in **Section 8** 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.

3.13 The scoping report identified viewpoints at **Table 8.1** to be assessed within the landscape and visual impact assessment. The Highland Council has recommended that 4 additional viewpoints should be added – see **section 3.7 A4**. SNH has also commented on viewpoints – see **Viewpoints section A33-A34**. The final viewpoints require to be agreed with the Energy Consents Unit in consultation with the Planning Authorities and SNH.

3.14 The cumulative noise assessment should be carried out in line with relevant legislation and standards as detailed in **Section 11** of the scoping report. This should include details about the representative background noise survey locations agreed with the relevant Planning Authority.

3.15 As well as send a full response at **A31-A35** SNH also provided a separate email at **A36** with comments on the confidential bird studies. The full email has been forwarded to the applicant but specific comments have been redacted in the version in **Annex A**. SNH has confirmed that two full years of survey will be required.

3.16 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. 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 form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development once an application is submitted.

5.7 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.

5.8 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB). In addition, a separate disc containing the EIA report and its associated documentation in electronic format will be required.


Energy Consents Unit
August 2019

ANNEX A

Consultation

List of consultees

- The Highland Council (Planning Authority) **A1-A20**
- Historic Environment Scotland **A21-A22**
- Scottish Environmental Protection Agency **A23-A30**
- Scottish Natural Heritage **A31-A36**
- Fort Augustus & Glenmoriston Community Council **A37-A38**
- Glenurquhart Community Council **A39**
- Strathglass Community Council **A40**
- Beaully District Salmon Fisheries Board*
- British Horse Society **A41-A42**
- British Telecommunications plc **A43-A45**
- Cairngorms national Park Association **A46**
- Civil Aviation Authority – Airspace*
- Crown Estate Scotland **A47**
- Defence Infrastructure Organisation **A49-A50**
- Fisheries Management Scotland **A51**
- Friends of the Earth (Scotland)*
- Highland and Islands Airport **A52**
- Highland and Islands Enterprise*
- Inverness Chamber of Commerce **A53-A54**
- Joint Radio Company Limited **A55-A57**
- John Muir Trust **A58**
- Mountaineering Scotland*
- NATS Safeguarding **A59**
- Ness & Beaully Fisheries Trust*
- Ness DFSB*
- OFCOM*
- RSPB Scotland **A60-A62**
- Scottish Canoe Association*
- Scottish Rights of Way and Access Society (ScotWays) **A63-A65**
- Scottish Water **A66-A68**
- Scottish Wild Land Group*
- Scottish Wildlife Trust*
- The Coal Authority **A69**
- Visit Scotland **A70-A71**
- WWF (Scotland)*

*No response was received.

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland **A72-A73**, Marine Scotland **A74-A75** and Scottish Forestry **A76**.

SSE Generation Limited
c/o The Scottish Government
Per: [REDACTED]
Consents Manager
Energy Consents Unit

[REDACTED]
Our Ref:
Your Ref:
Date:

[REDACTED]
19/03373/SCOP
23 August 2019

[REDACTED]
Dear Sir,

PLANNING REFERENCE: 19/03373/SCOP
DEVELOPMENT: BHLARAI DH WIND FARM EXTENSION
LOCATION: AT GLENMORISTON ESTATE NORTH OF LEVISHIE, INVERMORISTON,

Thank you for consulting The Highland Council on the Environmental Impact Assessment Scoping Request for the above project. We received the consultation on 17 July 2019 by email and we are grateful for the extension to make comments until 31 August 2019.

The remainder of this letter constitutes The Highland Council's response to the consultation.

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017****SCOPING RESPONSE TO ENERGY CONSENTS UNIT**

Applicant:	SSE Generation Ltd
Project:	Blaraidh Wind Farm Extension
Project Address:	At Glenmoriston Estate North Of Levishie, Invermoriston
Our Reference	19/03373/SCOP

This response is given without prejudice to the Planning Authority's right to request information in connection with any statement, whether Environmental Impact Assessment Report or not, submitted in support of any future application. These views are also given without prejudice to the future consideration of and decision on any planning application received by the Council.

The Highland Council request that any Environmental Impact Assessment Report (EIAR) submitted in support of an application for the above development take the comments highlighted below into account; many of which are already acknowledged within the Scoping Report submitted. In particular, the elements of this report as highlighted in parts 3, 4 and 5 should be presented as three distinct elements.

Where responses have been received by internal consultees these are attached and should be taken as forming part of the scoping response consultation from The Highland Council. If any further responses are received these will be forwarded to you as soon as practicably possible.

1.0 Description of the Development

1.1 The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR 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.
- The estimated cumulative impact of the project with other consented or operation development.

2.0 Alternatives

2.1 A statement is required which 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 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;
- the environmental effects of the different options examined.

Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.

3.0 Environmental Elements Affected

- 3.1 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 and you are encouraged to use your understanding of these in assessing your development. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.

Land Use and Policy

- 3.2 The EIAR should recognise the existing land uses affected by the development having particular regard for The Highland Council's Development Plan inclusive of all statutorily adopted supplementary guidance. Particular attention should be paid to the provisions of the Onshore Wind Energy Supplementary Guidance inclusive of the Landscape Sensitivity Appraisal for Loch Ness (please note this is an adopted part of the development plan and not draft as stated in the scoping report). This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and guidance on renewable energy and wind energy should be considered in this section. The purpose of this chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy.

Landscape and Visual

- 3.3 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 purposes 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 35mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50mm and 75mm. 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:

https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments

Separate volumes of visualisations should be prepared to both Highland Council Standards and SNH guidance. These should be provided in hard copy. It would be beneficial for the Highland Council volume to be provided in an A3 ring bound folder for ease of use.

- 3.4 This assessment should include the expected impact of on-site borrow pits and access roads, despite the fact that the principal structures will be a primary concern. All elements of a development are important to consider within any EIAR, including the visual impact of factors such as the loss of woodland and the impact of compensatory planting.
- 3.5 It should be noted that there are a number of similar applications in this area which 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 2019 and can be accessed on the link below:

<http://highland.gov.uk/windmap>

Consultation should also be undertaken with Energy Consents and Deployment Unit as to scheme which are currently at Scoping Stage as these may have advanced at the same pace as your proposal. Please note Dell Wind Farm is now consented.

- 3.6 Viewpoints (VP) for the assessment of effects of a proposed development must be agreed in advance of preparation of any visuals with The Highland Council. We are generally content with the viewpoints proposed but appreciate 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 also 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. With regard to the VP5 we would recommend that you have a viewpoint at the top of the path at the summit of the Suidhe as well as at the car parking area adjacent to the road.
- 3.7 Further the Planning Authority would request the following additional viewpoints:
- An Cabar (Ben Wyvis)
 - NCN1 – Between Dingwall and Evanton
 - Central Black Isle (on the road between Tore and Raddery)
 - A87 / A887 Bun Loyne
- 3.8 As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy schemes within the area as well as those currently under consideration. The detailed location of viewpoints will be informed by site survey, mapping and predicted Zones of Theoretical Visibility. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community takes this into account. The final list of viewpoints should be agreed with the Planning Authority.
- 3.9 The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view or for assessment of impact on designated sites, communities or individual properties.
- 3.10 We would seek a 45km study area, as proposed by the applicant, given the size of the turbines and we would expect a that a detailed assessment of effects should be undertaken for the whole study area.
- 3.11 When assessing the impact on recreational routes please ensure that all core paths, the national cycle network (inclusive of the Lands End to John O Groats route), long distance trails (inclusive of the Great Glen Way (high and low routes), South Loch Ness Trail and Great Glen Canoe Trail), and the North Coast 500 are assessed. It should be noted that these routes are used by a range of receptors.
- 3.12 The development will further extend the number of proposals of this type in the surrounding area, necessitating appropriate cumulative impact. It is considered that cumulative impact will be a significant material consideration in the final determination of any future application. The study area for cumulative impacts should extend to a minimum of 30km. Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there maybe an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined schemes in the Council's Panoramic

Viewer please see the link below:

<http://www.highland.gov.uk/panoramicviewer>

- 3.13 The SNH 2019 landscape character assessment should be used.
- 3.14 We expect an assessment of the impact on Wild Land Areas to be included within the EIAR given the proximity to a number of Wild Land Areas and the theoretical visibility of the scheme from within wild land areas. SNH will provide further advice on this matter.
- 3.15 We expect an assessment of the proposal against the criterion set out in the Council's Onshore Wind Energy Supplementary Guidance to be included within the LVIA chapter of the EIAR.
- 3.16 An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. As part of this the impact on the Special Landscape Areas (SLA) identified on figure 8.2 of the Scoping Report must be undertaken using the SLA citations available from the Council's website.
- 3.17 Aviation lighting will be required due to the proposed scale of the turbines. The affect of the aviation lighting should be assessed through the EIA process. A Lighting Impact Assessment will be required. This is a matter that should be considered from all viewpoints. It should form part of the LVIA chapter of the EIAR but should also be considered as part of the Wild Land Assessment. Further advice on aviation lighting is available from SNH.

Ecology

- 3.18 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 which 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 programme (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.
- 3.19 The EIAR should provide a baseline survey of the plants (and fungi) and trees present on the site to determine the presence of any rare or threatened species albeit it is accepted that the likelihood is low given the present land use of the site.
- 3.20 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. SNH 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. SNH provide advice on the impact on designated sites.
- 3.21 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.
- 3.22 The EIAR needs to address the aquatic interests within local watercourses, including down stream 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.
- 3.23 Further advice can be found in SNH's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken.

- 3.24 The EIAR should include an assessment of the effects on Ground Water Dependent Terrestrial Ecosystems (GWDTE). Please see the response from SEPA for detailed advice.

Ornithology

- 3.25 The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the planning application process, not as an issue which 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 the comments of SNH in this respect.
- 3.26 An assessment of the impacts of 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.

Noise

3.27 Operational Noise

The applicant will be required to 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 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. The night time lower limit of 43dB 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.

3.28 Cumulative Noise

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.

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 relaxation is being claimed.

The assessment should 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 12m/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 an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

3.29 Background Noise Measurements

Background noise surveys 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 however, it is unlikely that they will be able to attend the installation of equipment. Where possible, sites must avoid other noise sources such as boiler flues, wind chimes, squeaking gate, rustling leaves etc. Otherwise, the results may not be valid for any 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 advised that the developer consults the Council's Environmental Health Officer at an early stage to discuss the proposed methodology.

3.30 Construction Noise

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.

A construction noise assessment will be required in the following circumstances: -

- Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm

OR

- Where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months)

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

Amplitude Modulation

- 3.31 Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

Cultural Heritage

- 3.32 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) and

- the archaeological heritage (Scheduled Monuments),
 - the landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development.
 - the inter-relationship between the above factors.
- 3.33 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. It would be helpful if, 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 could be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.
- 3.34 Historic Environment Scotland (HES) will provide comment on the assessment methodology for heritage assets within their remit.
- 3.35 It is anticipated that HES will provide further comments on the scope of the assessment and their requirements for supporting information (including visualisations) and the potential impacts on heritage assets in their consultation response.
- 3.36 There are a large number of heritage assets in the vicinity of the development, these need to be assessed. HES have provided detailed advice on potential setting impacts.
- 3.37 We recommend that you liaise with colleagues in the Council's Historic Environment Team on the scope of the archaeological assessments.

Water Environment

- 3.38 The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on 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. You are strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.
- 3.39 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. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.
- 3.40 The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. 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.

- 3.41 You should 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.
- 3.42 It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.

Geology, Peat and Soils

- 3.43 The EIAR must consider the risks of engineering instability relating to presence to peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.
- 3.44 The EIAR should include a full assessment on the impact of the development on peat. SEPA have noted that the information collected so far shows that most of the site is on deep peat, with large areas of very deep peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micro-siting limits.
- 3.45 SEPA have provided detailed comments on methodology for peat probing and the peat assessment. These comments are supported by the Council.
- 3.46 Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.
- 3.47 The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.

Roads Infrastructure

- 3.48 Highland Council's Transport Planning Teams interests will relate largely to the impact of development traffic on the Council maintained road network and its users during the construction phase of the project. It has confirmed that it is generally satisfied with the proposed changes to the methodology. The community have also raised concerns around these matters.
- 3.49 A Transport Assessment (TA), or section on traffic and transportation, within the Environmental Statement for the project will be required. The TA should identify all roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic, including abnormal load movements, on these roads. Where necessary, the TA should consider and propose measures necessary to mitigate the impact of the development on the road network. Prior to preparation of the TA the developer should first carry out a detailed scoping exercise in consultation with the Council, as local roads authority and, as required, Transport Scotland as trunk roads authority.
- 3.50 Matters to be included in the Transport Assessment/Transport Statement:
- Identify all public roads affected by the development. In addition to transport of major

components this should also include routes to be used by local suppliers.

- Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:
 - assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required.
 - road surface condition and profile
 - assessment of structures and any weight restrictions
 - road widths, vertical and horizontal alignment and provision of passing places;
 - details of adjacent communities
- Traffic resulting from the proposed development including: -
 - nos. of light and heavy vehicles
 - abnormal loads. In respect of long loads trial runs are required.
 - duration of works
- Current traffic flows including use by school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.
- Impacts of proposed traffic including: -
 - impacts on carriageway, structures, verges etc.
 - impacts on other road users
 - impacts on adjacent communities
 - swept path and gradient analysis where it is envisaged that passage of traffic could be problematic.
- Cumulative impacts with other developments in progress and committed developments.
- Proposed mitigation measures to address impacts identified above including: -
 - details of the proposed site access at its junction with the public road to the standards set out in The Highland Council's Roads and Transportation Guidelines for New Developments available online at:

<http://www.highland.gov.uk/yourenvironment/roadsandtransport/roads/roadsandtransportguidelinesfornewdevelopments.htm>
 - carriageway strengthening
 - strengthening of bridges and culverts
 - carriageway widening and/or edge strengthening
 - provision of passing places
 - road safety measures
 - traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.
 - Details of residual effects.

3.51 The EIAR must consider the implications on the Trunk Road network as part of the EIAR process.

Tourism, Recreation and Socio-Economics

- 3.52 The EIAR should estimate who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & 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.
- 3.53 Estimations of who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc should be included. 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.
- 3.54 The site is on land with access rights provided by the Land Reform Scotland Act. Access rights on a core path are not enhanced but they are more protected during construction and similar activities. In line with the policies and provisions of the Highland-wide Local Development Plan a plan detailing the following should be submitted as part of the EIAR:
- Existing public non-motorised public access footpaths, bridleways and cycleways on the site and any proposed access route from the public road infrastructure; and
 - Proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water.
 - Impacts of the proposed development on the core paths and proposed mitigation if any.

Effects on Existing Infrastructure

- 3.55 The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes.
- 3.56 There should be continued dialogue with HIAL over the impact on the radar at Wick Airport.
- 3.57 If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.

Shadow Flicker

- 3.58 If there are no properties within 11 rotor diameters of the development, the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIAR.

Trees and Forestry

- 3.59 Within the boundary of the application site there limited areas of woodland albeit some areas of woodland adjacent to the access may be affected. If any areas of woodland likely to be affected by the development (including its access) the Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIAR.
- 3.60 The EIAR should indicate all the areas of woodland / trees that will felled to accommodate the

development, including any off site works / mitigation. Compensatory woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If so minded, permission is only likely to be granted on the basis that compensatory planting proposals are identified in advance. Compensatory planting should be within the Highland area and not form part of an already approved forestry plan/proposal that has gained FC funding. Areas of retained forestry or tree groups should be clearly indicated and methods for their protection during construction and beyond clearly described. If timber is to be disposed of, details of the methodology for this should be submitted.

Other Matters

- 3.61 The EIAR needs to address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted.
- 3.62 Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.
- 3.63 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, sunlight, prevailing wind direction, etc.

4.0 Significant Effects on the Environment


- 4.1 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, permanent and temporary, positive and negative effects of the development, resulting from: -
- the existence of the development;
 - the use of natural resources;
 - the emission of pollutants, the creation of nuisances and the elimination of waste.
- 4.2 The potential significant effects of development must have regard to: -
- the extent of the impact (geographical area and size of the affected population);
 - the trans-frontier nature of the impact;
 - the magnitude and complexity of the impact;
 - the probability of the impact;
 - the duration, frequency and reversibility of the impact.
- 4.3 The effects of development upon baseline data should be provided in clear summary points.
- 4.4 The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.
- 4.5 The applicant should provide a description of the forecasting methods used to assess the effects on the environment.

5.0 **Mitigation**

- 5.1 Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.
- 5.2 The mitigation being tabled in respect of a single development proposal can be manifold. Consequently 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. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). Further guidance can be obtained at http://www.highland.gov.uk/NR/ronlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction_environmental_management_22122010.pdf
- This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.
- 5.3 The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.

If you would like to discuss this scoping response please contact the Planning Authority using the details at the end of this response.


Team Leader – Strategic Projects



Proposal Name	Bhlaraidh Wind Farm Extension
Planning Reference	19/03373/SCOP
Date of Response	30 July 2019

Response

Operational Noise

The applicant will be required to 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 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. The night time lower limit of 43dB 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.

Cumulative Noise

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.

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 relaxation is being claimed.

The assessment should 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 12m/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 an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

Background Noise Measurements

Background noise surveys 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 however, it is unlikely that they will be able to attend the installation of equipment. Where possible, sites must avoid other noise sources such as boiler flues, wind chimes, squeaking gate, rustling leaves etc. Otherwise, the results may not be valid for any 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 advised that the developer consults the Council's Environmental Health Officer at an early stage to discuss the proposed methodology.

Construction Noise

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.

A construction noise assessment will be required in the following circumstances: -

- Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm

OR

- Where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months)

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

Private Water Supplies

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.

Dust

Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.

Key Points	Assessments to be carried out and/or submitted with application
<ul style="list-style-type: none"> • Noise • Private water supplies • Dust 	<ul style="list-style-type: none"> • Assessment of noise from wind turbines • Assessment of noise from construction activities • Investigation into private water supplies • Assessment of potential of dust nuisance
Organisation	Environmental Health
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Memorandum

To: Planning Service (Simon Hindson – Case Officer)

From: Transport Planning

Subject: Bhlaraidh Wind Farm Extension | Glenmoriston Estate North Of
Levishie Invermoriston

Date: 06/09/2019

Your ref: 19/03373/SCOP

Authored by: FEN

With reference to the above planning application, please find the Transport Planning Team's scoping response below. No site visit has been undertaken, with the response being based purely on a desk-top assessment exercise.

Proposed Development

The proposed development consists of an extension to the operational Bhlaraidh Wind Farm (planning ref. no. 12/02556/S36), located approximately 5 km north of Invermoriston. The extension will comprise approximately 41 turbines with a tip height of 180 metres maximum and blade diameter of 150 metres maximum.

Transport Assessment

Transport and Traffic matters are set out in Chapter 12 of the Scoping Report submitted. The report states that the methodology will principally follow the 'Guidelines for the Environmental Impact of Road Traffic' (2003). However, the Highland Councils preference is that Transport Assessment traffic estimations should be prepared with reference to **Planning: Transport Assessment and Implementation: A Guide**, as outlined in Paragraph 2.2.3.3 of our Roads and Transport Guidelines for New Developments. We consider the extent of the local road network assessment area to include areas where the traffic flows have increased by 10% or more.

Site Entrance

The site entrance is directly from the A887 Trunk Road, which is maintained by Transport Scotland. We recommend that Transport Scotland be given the opportunity to comment on this scoping application.

From: [REDACTED]
To: [REDACTED]
Subject: 19/03373/SCOP; Windfarm extension
Date: 09 August 2019 16:33:41

Dear [REDACTED]

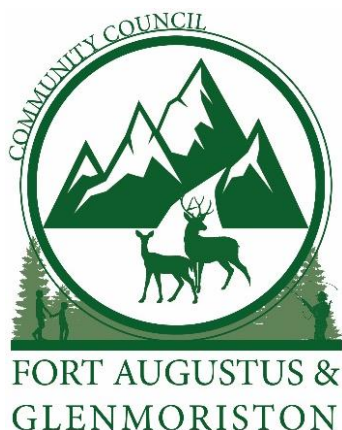
15.10.3 of the scoping report mentions the production of an Outdoor Access Plan. Ideally we would see that submitted with an application. A purpose of that plan, replicated in planning conditions for similar developments, was to illustrate how the developer would minimise their negative impact on public access and maximising the benefit.

This will mean minimising any restrictions on public access along existing paths and tracks during the construction phase and making sure that signs, gates and other access furniture welcomed and accommodated public access during the operational phase. For instance deer gates across tracks without pass gates will have pass gates installed next to them by the developer.

For the avoidance of doubt CDM regulations place obligations on developers to manage risks on site. That is not carte blanche to exclude the public from the whole site during construction. Where existing tracks are to be used during construction the developer will be expected to manage their operations to minimise risks to access takers who will be accommodated on those tracks before during and after construction.

Regards,

[REDACTED]



FORT AUGUSTUS AND GLENMORISTON

COMMUNITY COUNCIL

Energy Consents Unit
Consents Manager



ECU00001900

19/03373/SCOP

Bhlaraidh Windfarm Extension Scoping application

Fort Augustus & Glenmoriston Community Council submit the following comment for consideration;

The Community Council have serious concerns over another major construction development which is being considered within the short timescale of the original Bhlaraidh windfarm construction having been completed.

The local residents and businesses in the areas of Invermoriston, Glenmoriston and Fort Augustus are only now returning to some level of normal life on completion of the major Bhlaraidh development.

If the proposed extension is permitted then the communities, residents and the local environment will again be subjected to approximately two years of severe disruption, noise, increased construction traffic and the impact of a minimum of 150+ abnormal traffic movements through the area.

The Community Council request these matters are submitted for consideration in the scoping process.



Community Councillor



23 Abertarff Place

Fort Augustus

PH32 4DR

15th August 2019



By email to: [REDACTED]

Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: [REDACTED]
[REDACTED]

Our case ID: 300037514
Your ref: ECU00001900

09 August 2019

Dear Mr McCormack

Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Section 36 Application - Bhlaraidh Wind Farm Extension, Glenmoriston Estate, North of
Levishie, Invermoriston
Scoping Report

Thank you for your consultation which we received on 17 July 2019 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

I understand that the proposed development comprises 20 wind turbines of 180m blade tip height to be erected on land north of Levishie, Invermoriston, within Glenmoriston Estate.

Scope of assessment

We have provided pre-application advice for this proposal on 11 June 2019, when 27 turbines up to a maximum height of 180m to blade tip were being considered on this site. We note that the number of proposed turbines has been reduced to 20.

In our earlier response, we recommended that potential impacts of the proposal on two scheduled monuments: 'SM 4567 Levishie Cottage, fort and earthwork 1050m NE of' and Urquhart Castle should be assessed as part of the EIA process and that visualisations should be provided to support the assessment conclusions.



Having reviewed the submitted Scoping Report, we note that the potential setting impacts on the two scheduled monuments highlighted in our pre-application response will be assessed in the cultural heritage chapter and that the relevant visualisations will be utilised to assess the proposal and inform mitigation if appropriate. On this basis, we can confirm that the scope of the proposed assessment is appropriate for our historic environment interests.

We can also confirm that at this stage we have not identified any additional heritage assets that we would like to see included in the assessment. A detailed ZTV analysis should assist in identifying any further assets likely to receive impacts on their setting.

Further information

Please note that on 1 May 2019 we adopted the new Historic Environment Policy for Scotland. You can find the full set of policy and guidance, including our 'Managing Change in the Historic Environment', online at www.historicenvironment.scot/heps. Technical advice is available through our Technical Conservation website at www.englished.org.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Urszula Szupczynska and they can be contacted by [REDACTED]

Yours sincerely

Historic Environment Scotland

[REDACTED]
Energy Consents Unit
The Scottish Government
Edinburgh

[REDACTED]

6 August 2019

By email only to: Econsents_Admin@gov.scot

Dear [REDACTED]

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations
2017
Bhlaraidh Wind Farm Extension
Glenmoriston Estate, North of Levishie, Invermoriston**

Thank you for consulting SEPA on the scoping opinion for the above development proposal by your email received on 17 July 2019.

We would also very much welcome the opportunity to provide advice on the proposed layout and peat management and groundwater dependant terrestrial ecosystem sections of the EIA Report before they are formally submitted.

Advice to the determining authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection**, the information outlined below and in the attached appendix must be submitted in support of the application.

- a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications.
- b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.
- c) Peat depth survey and table detailing re-use proposals.
- d) Map and site layout of borrow pits.
- e) Schedule of mitigation including pollution prevention measures.
- f) Decommissioning statement.

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment.

1. Site specific comments

- 1.1 Enough baseline information must be collected to full inform the layout of the development to ensure that what comes forward in the application is what will be built on site; detailed habitat and peat probing information will be required.
- 1.2 We welcome the fact that the scoping report identifies that the design will make use of existing infrastructure, such as tracks and borrow pits. This is likely to be the main way that the impact of the development on the environment can be minimised.
- 1.3 We also welcome the fact that a buffers of 50 m will be included between infrastructure and water features. Note a further buffer may be required (1) above lochs, as impacts on lochs from sedimentation, should it reach them, are likely to be significant, and (2) where there are steep slopes adjacent to the watercourse.
- 1.4 We are generally supportive of the proposals for peat survey, however we highlight that enough information will need to be collected to demonstrate that the deepest areas of peat have been avoided. We would therefore welcome the opportunity to provide advice on the phase 2 probing strategy before it is undertaken.
- 1.5 We welcome the inclusion of the Phase 1 Habitat Plan within the scoping report and note that a National Vegetation Classification (NVC) survey has also already been undertaken. The information currently provided suggest that there will be groundwater dependant terrestrial ecosystems on the site so we ask that the applicant sends us a copy of the NVC results so that we can provide early advice on further assessment and proposed layout and refer them to section 4 of the appendix for further advice. At this stage we are unable to provide a view on whether the potentially groundwater dependant habitats are actually groundwater dependant at this site.
- 1.6 In relation to battery storage, please include an indicative layout plan showing the design and scale of the facility, including any bunding requirements. Information should be provided on the environment risks associated with the facility.

Regulatory advice for the applicant

2. Regulatory requirements

- 2.1 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. See the [The CAR Practical Guide](#) for advice on water environment regulatory issues. A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from the construction site. See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.
- 2.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 2.3 If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at: Graesser House, Fodderty Way, Dingwall Business Park, Dingwall, IV15 9XB - Tel: 01349 862021.

[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

1. Site layout

- 1.1 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 site 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 wherever 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.

2. Engineering activities which may have adverse effects on the water environment

- 2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and 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.
 - Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.
- 2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.
- 2.3 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).
- 2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk

Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

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

- 3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments must aim to minimise this release."
- 3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.
- 3.3 The submission must include:
- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
 - b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.
- 3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).
- 3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.
- 3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

- 4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:
- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

4.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

5. Existing groundwater abstractions

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all 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. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

6. Forest removal and forest waste

6.1 Key holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.

6.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:

- a) A map demarcating the areas to be subject to different felling techniques.
- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

7. Borrow pits

7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.

7.2 In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.
- b) 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 250 metres. 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. 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, drawings of what is proposed in terms of engineering works.
- c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
- e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
- f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
- g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
- h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂.
- i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

8. Pollution prevention and environmental management

8.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. 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 ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention \(GPPs\)](#).

9. Life extension, repowering and decommissioning

- 9.1 Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.
- 9.2 The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).



Scottish Natural Heritage
Dualchas Nàdair na h-Alba
nature.scot

[REDACTED]
Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

[REDACTED]
Date: 23 August 2019
Our ref: A3040633

Dear [REDACTED]

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAIDH WIND FARM EXTENSION

Thank you for consulting Scottish Natural Heritage (SNH) on the above proposal.

1. Summary

This proposal has the potential to adversely affect a number of nationally important natural heritage interests. If the proposal is progressed as described in the scoping report without further mitigation SNH may object to the proposal. Further details are provided below.

2. Appraisal

Landscape and Visual effects

Glen Affric National Scenic Area

Glen Affric is recognised as one of the most beautiful glens in Scotland with a grandeur and classic beauty not readily found elsewhere. The path to the north of Loch Affric forms part of a historic route which is recognised within the Special Qualities of the NSA. The path forms part of a circular route which is popular for recreation and a location where many of the special qualities can be strongly experienced.

The ZTV illustrates that there would be visibility of the proposal from a long stretch of the circular walk round Loch Affric, which is also a recognised backpacking route, and therefore that a number of the NSA's Special Qualities could be impacted upon. Our advice is these impacts should be mitigated by designing out visibility of the wind farm from this part of the NSA.

Scottish Natural Heritage, Silvan House, 3rd Floor East, 231 Corstorphine Road, Edinburgh EH12 7AT
Tel: 0131 316 2600 www.nature.scot

Dualchas Nàdair na h-Alba, Taigh Silvan, 3mh Làr an Ear, 231 Rathad Chros Thoirphin, Dùn Èideann
EH12 7AT
Fòn: 0131 316 2600 www.nature.scot

An assessment of the impacts on the special qualities of NSA should be included in the LVIA

Wild Land Areas

The proposal is approximately 8km from The Central Highlands Wild Land Area (WLA). 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, 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.

A full lighting assessment should be provided which includes the assessment of lighting on Wild Land Areas. The lighting assessment should include lowlight photomontages from the wild Land Area. Further comments on the lighting assessment and viewpoints are provided below.

A wild land assessment should be included within the EIAr.

Please note that should landscape and visual impacts outlined above not be mitigated SNH may object to the proposal.

Design Principles

Our Siting and designing wind farms in the landscape guidance¹ provides design advice specifically for wind farm extensions. Paragraph 4.16 states:

“Design objectives and principles should echo those of the original wind farm. Extensions should use turbines which are compatible with those in the existing wind farm, including aspects of scale, form, colour, and rotation speed. Generally, the design rationale of the original wind farm development should not be eroded.”

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.

Turbine Lighting

We note that turbines of 150m or taller would require visible lighting². We advise that there is a need for a lighting impact assessment wherever this is the case, as identified in the scoping report. Nonetheless, the effects of aviation lighting could be significant in some locations and should be assessed through the EIA process.

Wind farms tend to be located in areas which contain limited artificial lighting. Darkness/dark skies in these areas may be valued by many people, a proportion of whom may be actively seeking out and enjoying good views of the night sky. The absence of human artefacts is also a key quality of Wild Land Areas.

Turbine lights can be seen over considerable distances, with some clearly visible at 20-30km. A flashing effect can also occur, depending on wind direction, as turbine blades pass in front of the nacelle-mounted lighting. Turbine lighting could therefore adversely affect people’s experience and enjoyment of darkness/dark skies and of sunset and sunrise views (noting that turbine lights are switched on before dusk and off after dawn). As a result, we

¹ <https://www.nature.scot/siting-and-designing-wind-farms-landscape-version-3a>

² The requirement for aviation lighting is set out in Civil Aviation Authority (CAA) guidance – see <http://www.caa.co.uk/Safety-Initiatives-and-Resources/Safety-projects/Windfarms/Windfarms/> and <http://publicapps.caa.co.uk/docs/33/CAP764%20Issue6%20FINAL%20Feb.pdf>. All onshore wind turbines of over 150m require steady red aviation lights. The requirements offshore are slightly different and are set out the same CAA guidance. Some wind turbines of less than 150m may also require aviation lights depending on location and proximity to both civil and military aviation interests.

recommend that these effects should be carefully assessed and that mitigation is employed wherever possible.

Assessment of the landscape and visual effects of turbine lighting is a relatively new practice. The extent of the lighting assessment study area for LVIA should be informed by the Zone of Theoretical Visibility (ZTV) map and an understanding of the nature of the likely effects. As a starting point we highlight advice in our existing landscape guidance³, however we advise that the LVIA-related lighting assessment should include:

- Clear information on the positions and intensity of lighting proposed and, if only certain turbines are to be lit (e.g. due to a mix of turbine heights), a plan showing which turbines (numbered turbines) would be lit.
- Production of a ZTV map which shows the areas from which the nacelle and tower lights may be seen.
- Annotation of the positions of turbine lighting (including intermediate tower lights) on all wirelines from every viewpoint.
- A table which lists how many lit turbines will be visible from each viewpoint⁴.
- Written assessment based on fieldwork for all relevant viewpoints (i.e. with potential visibility of lighting, and where effects may be significant). In a worst case scenario this may involve all viewpoints, but judgement should be applied to ensure the assessment remains focused on likely significant effects. The assessment should take into account the baseline darkness/ artificial lighting characteristics and people's likely use of different areas during darkness and low light (dusk/ dawn) conditions. In some cases, there may be the need to select some of the LVIA assessment viewpoints on the basis of the turbine lighting impacts, as opposed to day-time visual effects. Edge of settlement locations are likely to be better lighting assessment viewpoints, compared with locations within towns/villages (i.e. given the influence of existing street lighting, etc.).
- Night-time visualisations from a limited number (we suggest two or three) of representative viewpoints. These may be selected on the basis of sensitivity or regular usage during low-light conditions.

We would encourage the applicant to explore all available forms of lighting mitigation and, in particular, to seriously consider the potential for proximity activated lighting. It is our understanding that this proximity activated lighting technology could potentially be a very effective solution to lighting related impacts and would likely mean that turbines lights would be switched off for over 98% of the time. Discussion of case-specific permissibility issues for proximity activated lighting should be taken forward with the Civil Aviation Authority (CAA) (contact [REDACTED])

Viewpoints

We provide the following comments on viewpoints for inclusion in the LVIA.

Viewpoint 13 Carn Ghluasaid should be relocated approximately 2km north west along the ridge to Sgurr nan Conbhrairean (212990, 813896). Sgurr nan Conbhrairean is the highest point in the same group of hills, which are usually visited together, and also on the boundary of the NSA.

Viewpoint 8, as described above any impacts on the Glen Affric NSA are a key consideration particularly in the area round Loch Affric. If visibility isn't designed out of this area an

³ Please note that some brief advice on this aspect is contained within our recently updated landscape guidance. See at paras 2.11-2.13 of our Siting and Design guidance and at paras 174-177 of our Visual Representation guidance – which can both be found at <https://www.snh.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/wind-farm-impacts>.

⁴ See example table in the annex to this document.

additional viewpoint should be included to supplement VP8. Possibly on the path near 218260, 823956 or on the path north of Affric lodge (if there is visibility).

Toll Creagach (219454, 828289) a Munro within the Glen Affric NSA. The Munros north of Glen Affric are popular and are key location where the qualities of the NSA are enjoyed. This viewpoint will also illustrate how the design of the proposed extension fits with the existing wind farm.

Sgurr na Ruaidhe (228902, 842609) a Munro which forms part of the popular Glen Strathfarrar group of hills. The proposal will sit in views behind the Glen Strathfarrar NSA and it will be important to understand how the design of the extension fits with the existing wind farm.

At least two low light photomontages should support the turbine lighting assessment with receptors within the NSA and WLA being a key issue. Viewpoints 11 and 12 would be suitable as would Toll Creagach.

Ornithology and Ecology

The proposal could result in impacts on bird populations which may raise natural heritage issues of national interest. If this is the case SNH would object to the proposal.

A number of important and sensitive species have been recorded in the immediate vicinity of the proposal. Our advice is our bird survey guidance⁵ should be closely followed and two full years of survey will be required.

An assessment of the impacts on the North Inverness Lochs Special Protections Area (SPA) and the Loch Knocky and nearby Lochs SPA should be included with in the EIAr. We advise that information to support an appropriate assessment is likely to be required. Given the difficulties of surveying the particular qualifying interests at these sites theoretical modelling will be required. We can provided further advice on this and refer to the approach we advised on at Druim Ba wind farm.

We will provide further information on confidential issues separately.

Bats

Bat surveys should follow the latest guidance⁶ as published in 2019. Please note the number of detectors required to survey a site of this size and scale.

Carbon Rich Soils, Deep Peat and Priority Peatland Habitat

SNH's Carbon & Peatland Map 2016 identifies that much of this proposal is located within 'Class 1 or 2 Nationally important carbon-rich soils, deep peat and priority peatland habitat'. The Environmental Impact Assessment report (EIAr) should demonstrate that any significant effects have been substantially overcome by siting, design or other mitigation. **We advise that this may be difficult to achieve and could result in an objection from SNH.** Details of all mitigation, including a peatland management plan and a habitat management plan should be included in the EIAr.

3. Concluding remarks

Our pre-application advice for wind farms, which is available on our website from the link below⁷, provides further details and a checklist of what should be included in the EIA.

⁵ <https://www.nature.scot/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms>

⁶ <https://www.nature.scot/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation>

If you have any questions in relation to any of the above, please do not hesitate to contact me.

Yours sincerely

A large black rectangular redaction box covering the signature area.

⁷ <https://www.nature.scot/sites/default/files/2018-02/SNH%20General%20pre-application%20and%20scoping%20advice%20%20to%20developers%20of%20onshore%20wind%20farms.pdf>

[REDACTED]

From: [REDACTED]
Sent: 26 August 2019 16:42
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Bhlaraidh Wind Farm Extension

[REDACTED]

Thanks for the email.

The confidential issues are the bird species recorded within the study area. The following information should be provided confidentially with the EIA.

Redacted

As stated in the main response, this is a sensitive site in ornithology terms. Two full years of survey will be required.

Happy to discuss any of the technical aspects of the assessments as they are further developed.

Kind regards,
[REDACTED]

From: [REDACTED]
Sent: 26 August 2019 15:31
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Bhlaraidh Wind Farm Extension

[REDACTED]

Many thanks for your response.

In the Ornithology and Ecology section you state you will provide further information on confidential issues separately. Can you indicate when this will be provided?

Happy to discuss.

[REDACTED]

Consents Manager | Energy Consents Unit | **The Scottish Government**



FORT AUGUSTUS AND GLENMORISTON

COMMUNITY COUNCIL

[REDACTED]
23 Abertarff Place
Fort Augustus
PH32 4DR

15th August 2019

Energy Consents Unit
Consents Manager

[REDACTED]

ECU00001900

19/03373/SCOP

Bhlaraidh Windfarm Extension Scoping application

Fort Augustus & Glenmoriston Community Council submit the following comment for consideration;

The Community Council have serious concerns over another major construction development which is being considered within the short timescale of the original Bhlaraidh windfarm construction having been completed.

The local residents and businesses in the areas of Invermoriston, Glenmoriston and Fort Augustus are only now returning to some level of normal life on completion of the major Bhlaraidh development.

If the proposed extension is permitted then the communities, residents and the local environment will again be subjected to approximately two years of severe disruption, noise, increased construction traffic and the impact of a minimum of 150+ abnormal traffic movements through the area.

The Community Council request these matters are submitted for consideration in the scoping process.

[REDACTED]

. Community Councillor

[REDACTED]

From: [REDACTED]

Sent: [REDACTED]

[REDACTED] on Planning application - 19/01917/PREMAJ Bhlaraidh Extension, Glenmoriston Estate North Of Levishie Invermoriston,

[REDACTED] [REDACTED]
As we couldn't access Highland Council Planning site to fill in a comment, I sent our comment to the case officer [REDACTED] ... see below so we did respond.

[REDACTED]
Planning Sec.

Glen Urquhart Community Council.

From: [REDACTED]

Date: Tuesday, 2 July 2019 at 10:55

To: [REDACTED]

Subject: GCC comment on Planning application - 19/01917/PREMAJ Bhlaraidh Extension, Glenmoriston Estate North Of Levishie Invermoriston,

Hi [REDACTED]

Tried to get this application on council website but couldn't ... take it its not up yet and this is just a pre warning of plans to come.

Anyway ... discussed at last CC meeting 24/6 and this was our feeling:

Ref Number 19/01917/PREMAJ **Application Type** Major Pre-Application

Validation Date 30/05/2019 **Grid Reference** 240062 822163

Description of Works Proposed to be over 50MW, comprising turbines with a tip height of up to 180m and a rotor diameter of up to 150m

Location of Works Bhlaraidh Extension, Glenmoriston Estate North Of Levishie, Invermoriston,

Community Council Glenurquhart Community Council

Applicant Name SSE Renewables

Applicant Address [REDACTED]

Case Officer [REDACTED]

Glen Urquhart Community Council has both landscaping issues and concerns on the visibility of these turbines.

We are unable to comment any further until a full and detailed drawing is put forward as to where these turbines are to be positioned on said landscape.

[Redacted]

From:

[Redacted]

Sent:

02 August 2019 10:51

[Redacted]

[Redacted]

[Redacted]

Subject:

Scoping opinion - ECU00001900 - Bhlraidh Windfarm Extension.

Dear [Redacted],

I write on behalf of Strathglass Community Council regarding our requested scoping opinion regarding the above mentioned development.

We are of the opinion that this proposal will represent a considerable extension to the existing windfarm and will have a substantial visual impact over a vast area beyond it's intended location.

We therefore request that a rigorous visual impact assessment is insisted upon and that all neighbouring community councils, including Strathglass Community Council, are identified as mandatory consultees.

Thank you and regards,

[Redacted]

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[REDACTED]

From: [REDACTED]
Sent: 16 August 2019 10:35
To: [REDACTED]
[REDACTED] Bhlaraidh Wind Farm Extension

Dear [REDACTED], apologies for being a week late with my comments – re Bhlaraidh Wind Farm in the Great Glen, it is reassuring to see horse riding mentioned and being considered in the Public access notes. The British Horse Society has no objection to this extension, and thank you for consulting.

[REDACTED]

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

Telephone: [REDACTED]
Email: [REDACTED]
Website: www.bhsscotland.org.uk www.bhsscotland.org.uk

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[REDACTED]

From: [REDACTED]
Sent: 23 July 2019 09:47
To: [REDACTED]
[REDACTED] RE: Bhlaraidh Wind Farm Extension

[OUR REF; WID11026](#)

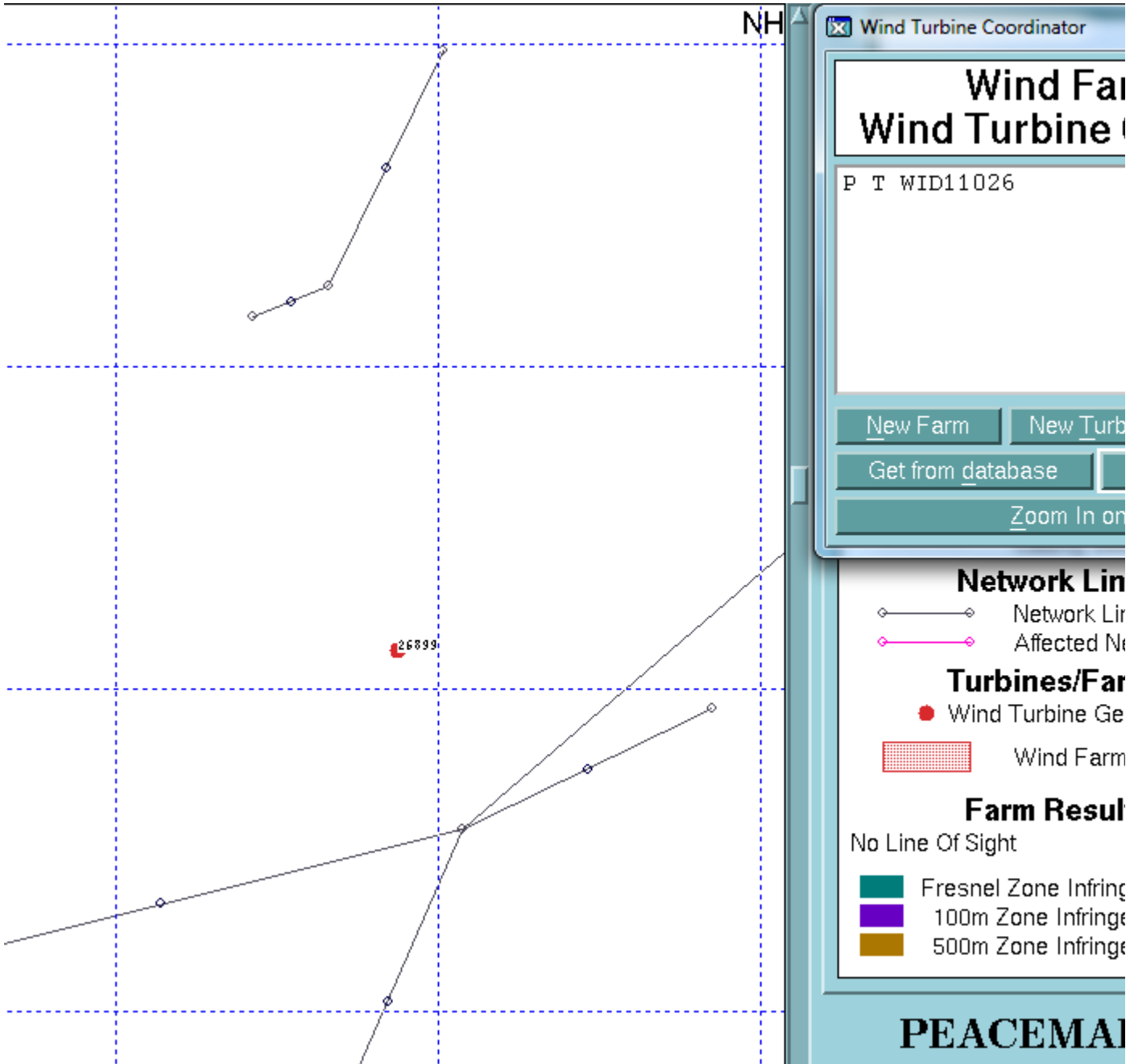
Dear Sir/Madam

Thank you for your email dated 18/07/2019.

We have studied this Windfarm proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

Using the British National Grid (BNG) reference for the centre point of the indicative Turbine Development Area (238732, 821202), I don't believe the proposed windfarm consisting of 20 turbine locations will have an impact on any of our fixed radio links in the surrounding area, as per the Network Map below (the blue lines represent 10km square grids) and the red dot(26899) indicates the central point of the windfarm development, approx. 4-5km from our fixed radio links. BT require ideally 100m minimum clearance from the Blade tip to the link path.

The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.



Kind Regards,

[Redacted signature block]

Openreach

Tel: [Redacted]
Mobile [Redacted]
Web: www.openreach.co.uk

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Registered Office: Kelvin House, 123 Judd Street, London WC1H 9NP

Registered in England and Wales no. 10690039

[Redacted]

From: [Redacted]
Sent: 08 August 2019 10:52
To: [Redacted]
Cc: [Redacted]
[Redacted] Bhlraidh Wind Farm Extension

Dear [Redacted]

Thank you for your consultation on the scoping request for the above proposal.

I would advise that, given the location of the proposed development, the Cairngorms National Park Authority has no comments to make in this case

Yours sincerely

[Redacted signature block]

[Redacted text block]

Please note that my working days are Wednesday to Friday

[REDACTED]

From: [REDACTED]
Sent: 05 August 2019 09:14
To: [REDACTED]
Subject: 20190805 - Bhlaraidh Wind Farm Extension - CES interests not affected - response to Scotgov

Dear [REDACTED]

Thank you for your email.

I confirm that the assets of Crown Estate Scotland are not affected by this proposal, we therefore have no comments to make.

Kind regards

Joan.

[REDACTED]

Legal disclaimer – important notice

The information in this message, including any attachments, is intended solely for the use of the person to whom it is addressed. It may be confidential and it should not be disclosed to or used by anyone else. If you receive this message in error please let the sender know straight away. We cannot accept liability resulting from email transmission. Crown Estate Scotland's head office is at 6 Bells Brae, Edinburgh EH4 3BJ



Defence Infrastructure Organisation

Teena Oulaghan
Safeguarding Manager
Ministry of Defence
Safeguarding Department
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Your Reference: ECU00001900

Telephone [MOD]: 07970 170934

Our Reference: DIO10046103

E-mail: [REDACTED]

[REDACTED]
Energy Consents Unit,
Scottish Government,
4th Floor,
5 Atlantic Quay,
150 Broomielaw,
Glasgow,
G2 8LU

26th July 2019

Dear [REDACTED]

Please quote in any correspondence: DIO10046103

Site Name: Bhlaraidh Wind Farm Extension

Site Address: Glenmoriston Estate, near Invermoriston, Highlands.

Thank you for your consultation requesting scoping advice from the Ministry of Defence (MOD) regarding your proposed wind energy development.

I am writing to tell you that the MOD has no concerns with the proposal. Our assessment has been carried out on the basis that there will be 20 turbines at 180.00 metres to blade tip and located at the grid references below.

Turbine	Easting	Northing
1	236,642	822,059
2	237,125	822,597
3	238,589	822,033
4	239,157	822,223
5	239,575	821,913
6	240,159	821,942
7	240,802	821,781
8	240,157	821,332
9	239,261	821,420
10	238,695	821,484
11	238,272	821,046
12	238,834	820,889
13	239,529	820,936
14	240,057	820,757
15	240,732	820,996

16	241,075	820,582
17	240,661	820,135
18	239,978	820,149
19	239,412	820,046
20	238,759	820,297

Low Flying

Fixed Wing military low flying training takes place throughout the United Kingdom down to a height of 250ft above ground level and in certain designated areas down to a height of 100ft above ground level. A turbine development of the height and at the location you propose may have an impact on low flying operations. We have produced a map which indicates areas in the UK where the MoD is more likely or less likely to object to wind turbine planning applications on the grounds of interference with low flying operations. The following link will take you to this map, which has been produced only for guidance and does not offer definitive advice on the MODs position

<http://webarchive.nationalarchives.gov.uk/20140802171818/https://restats.decc.gov.uk/cms/aviation-safeguarding-maps/>

In the interests of air safety, the MOD will request that the development should be fitted with MOD accredited aviation safety lighting. The turbines should be fitted with aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.

Meteorological Office Radar

The Met Office is now a statutory consultee for planning relating to their technical infrastructure, therefore the MoD has not informed the Met Office of this pre-application. If your development falls within any of the Met Office safeguarded zones you will need to contact the Met Office directly. More information is available on the Met Office website at

<http://www.metoffice.gov.uk/learning/library/publications/safeguarding>

If the application is altered in any way, we must be consulted again as even the slightest change could unacceptably affect us.

If you apply for planning permission, you must ensure that the relevant planning authority consults this office to ensure that no concerns have arisen since the date of this letter.

If planning permission is granted you must tell us;

- the date construction starts and ends;
- the maximum height of construction equipment;
- the latitude and longitude of every turbine.

This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area.

It should be noted that this response is based on current levels of wind farm development in the area and on current technical and operational parameters. If additional wind farms are consented or built, or if our assessment parameters alter prior to this development being submitted for planning consent, our position may change.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely

[Redacted]

[Redacted]
[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 18 July 2019 10:32
To: [REDACTED]
RE: Bhlaraidh Wind Farm Extension

Dear [REDACTED]

Thank you for your correspondence concerning the proposed wind farm extension at Bhlaraidh.

Fisheries Management Scotland (FMS) represents the network of Scottish District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries and the fishery trusts who provide a research, educational and monitoring role for all freshwater fish.

FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal.

The proposed development falls within the district of the Ness District Salmon Fishery Board, and the catchments relating to the Ness & Beaully Fishery Trust. It is important that the proposals are conducted in full consultation with these organisations (see link to FMS member DSFBs and Trusts below). We have also copied this response to these organisations.

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.

- [LINK TO ADVICE ON TERRESTRIAL WINDFARMS](#)
- [LINK TO DSFB CONTACT DETAILS](#)
- [LINK TO FISHERY TRUST CONTACT DETAILS](#)

Regards,

Brian

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 22 August 2019 11:52
To: [REDACTED]
[REDACTED] RE: Bhlaraidh Wind Farm Extension

Your Ref: ECU00001900
HIAL Ref: 2019/0079/INV

Dear Sir/Madam,

PROPOSAL: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAI DH WIND FARM EXTENSION
LOCATION: Glenmoriston Estate, near Invermoriston, Highlands

Thank you for agreeing an extension to respond to this application.

It is noted that the proposal contains an indicative Turbine Development Area, comprising of an expected 20 turbines, and site specific turbine locations have not yet been determined.

This development falls inside the safeguarded areas for Inverness Airport (*as defined in CAP 764 – CAA Policy and Guidelines on Wind Turbines*).

The turbines could possibly affect the performance of electronic aeronautical systems for the airport and is potentially line of sight from our radar. HIAL would not wish to see a degradation of the Radar installation.

It should be noted that HIAL would work with the developer towards a resolution. However, HIAL are likely to object to any proposal which impacts on the radar, unless a solution can be found to mitigate the effect on Inverness Airport's operation.

Regards,



DYW | INVERNESS & CENTRAL HIGHLAND
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inverness
CHAMBER OF COMMERCE
Serving Highland Businesses Since 1893



30th July 2019

Dear [REDACTED]

ELECTRICITY ACT 1989

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAI DH WIND FARM
EXTENSION**

Thank you for your email of 17th July 2019 in relation to this wind farm extension application. I write on behalf of the Board and Members of Inverness Chamber of Commerce in support of SSE's plans for an extension to their existing Bhlaraidh wind farm.

As the largest independent business organisation in the Scottish Highlands, Inverness Chamber of Commerce aims to connect, support and represent our members and the wider Highland business community and, in doing so, promote economic growth and investment in our communities. Therefore, we were pleased to learn that SSE is planning to construct an extension to their Bhlaraidh wind farm.

We firmly believe that this project will play a key part in meeting the aspiration of the Scottish Government to achieve 100% of the nation's gross annual electricity consumption from renewable sources by 2020. In addition, we assert that SSE have more than adequately addressed the environmental and ecological impacts of this development. Furthermore, SSE have sought to maximise the socio-economic benefits arising from this development through the community benefit and job creation opportunities which will result from this project both during the construction phase and thereafter in terms of ongoing operations and maintenance.

As the strong voice of business in the Highlands, we can attest to the critical importance of the onshore wind farm sector in the region, which has grown significantly in recent years. We believe that a development of this nature can and will find a receptive audience from the local and wider Highland communities.

I'm pleased, without hesitation, to offer the full support of Inverness Chamber of Commerce to this project and would be more than happy to provide you with any further information you require at this stage.

Yours sincerely,

Inverness Chamber of Commerce, Metropolitan House, 31-33 High Street, Inverness, IV1 1HT
Tel: 01463 718131



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From: [REDACTED]

23 July 2019 10:28

To: [REDACTED]

Subject:

Bhlaraidh Wind Farm Extension [WF720325]

Dear [REDACTED]

A Windfarms Team member has replied to your coordination request, reference **WF720325** with the following response:

Dear Sir/Madam,

Many thanks for supplying the turbine positions,

Site Name:

Bhlaraidh Wind Farm Extensio

Turbine at NGR:

Turbine 1 - 236642 822059

Turbine 2 - 237125 822597

Turbine 3 - 238589 822033

Turbine 4 - 239157 822223

Turbine 5 - 239575 821913

Turbine 6 - 240159 821942

Turbine 7 - 240802 821781

Turbine 8 - 240157 821332

Turbine 9 - 239261 821420

Turbine 10 - 238695 821484

Turbine 11 - 238272 821046

Turbine 12 - 238834 820889

Turbine 13 - 239529 820936

Turbine 14 - 240057 820757

Turbine 15 - 240732 820996

Turbine 16 - 241075 820582

Turbine 17 - 240661 820135

Turbine 18 - 239978 820149

Turbine 19 - 239412 820246

Turbine 20 - 238759 820297

Hub Height: 115m Rotor Radius: 79m

*This proposal *cleared* with respect to radio link infrastructure operated by:*

The local electricity utility and Scotia Gas Networks

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

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).

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

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 offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.

Regards

[Redacted]

[Redacted]

[Redacted]

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

<http://www.jrc.co.uk/about-us>

JRC is working towards GDPR compliance. We maintain your personal contact details in accordance with GDPR requirements for the purpose of "Legitimate Interest" for communication with you. However you

[Redacted]

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=01xtmdqaagbh2aaa6AgPMXnxf%2BNJA%3D%3D>

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For more information please visit <http://www.symanteccloud.com>

This email has been received from an external party and has been swept for the presence of computer viruses.

[Redacted]

Sent:

17 July 2019 14: [Redacted]

Subject:

Ashton M (Mark)
RE: Bhlaraidh Wind Farm Extension

Dear [Redacted]

Thank you for sending this – we do not intend to respond to this at scoping stage, but will review if we need to respond at application stage.

[Redacted]

[Redacted]

[Redacted]

Please note my normal working days are Monday to Thursday

The John Muir Trust is a charity that protects, enhances and engages people with wild places. [Join us.](#)

[REDACTED]

From: [REDACTED]
Sent: 30 July 2019 11:26
To: [REDACTED]
Subject: RE: Bhlaraidh Wind Farm Extension (SG15092)

Dear [REDACTED]

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (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. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

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.

Yours faithfully

NATS

NATS Safeguarding

[REDACTED]

[REDACTED]



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

[REDACTED]

9 August 2019

Dear [REDACTED]

ECU00001900 | Bhlaraidh Windfarm Extension

Thank you for consulting RSPB Scotland on this scoping request in relation to the Bhlaraidh Wind Farm extension proposal which includes the erection of up to 20 wind turbines and associated infrastructure.

RSPB Scotland is supportive of the use of renewable energy, but wind farms must be carefully sited to avoid negative impacts on sites and species of conservation importance.

The current proposal has the potential to impact on a number of birds of conservation concern, including Slavonian grebe, with survey work having identified a pair breeding (representing well over 1% of the current national population) within close proximity to the proposal area.

Designated Sites & Birds of Conservation Concern

We recommend scoping in effects on the North Inverness Lochs Special Protection Area (SPA) and Loch Knockie SPA which are notified for breeding Slavonian grebes. We note the scoping report states that there is considered to be '*limited* to no connectivity between the Proposed Development and Loch Knockie and Nearby Lochs SPA, North Inverness Lochs SPA' which have Slavonian grebe as a qualifying interest and therefore any potential effects relating to Slavonian grebe will be assessed against the regional NHZ population, and not the SPA. It is noted that a precautionary approach is required in relation to Habitat Regulation Appraisals and if a risk cannot be excluded on the basis of objective information then a likely significant effect must be assumed. Therefore, it is essential that decisions to scope out connectivity with SPAs are justified by sufficient and robust data. Given the uncertainty in this regard, we do not agree that there is no potential for connectivity and consequently do not believe that the effects related to designated sites can be scoped out.

Slavonian grebes can move between sites in March/April before they settle down on a loch to breed. It is therefore extremely important that any potential effects on the North Scotland population (totalling only a provisional 26 pairs in 2019) is carefully assessed in the context of nearby SPAs.

The site and its surrounds is used by a number of other Schedule 1 of the Wildlife and Countryside Act and/or Annex 1 of the EU Birds Directive species as well as other species that are red or amber listed as being of conservation concern and impacts on these species should be fully assessed. We particularly welcome the intention to include further modelling and additional assessment for Slavonian grebe and golden eagle and would welcome the opportunity to provide further advice and information to the applicant in this regard.

Slavonian Grebe

The proposed development lies in an area to the north-west of Loch Ness that forms part of the core breeding range in Scotland (and the UK) of the Slavonian grebe, one of our rarest

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

waterbirds. The breeding range in Britain has always been restricted to a few freshwater lochs in a relatively small part of Scotland. The proposed windfarm site lies close to one of the few remaining breeding sites of this species and impacts on this species including disturbance and collision risk should be assessed.

We are aware of the difficulties in accurately assessing collision risk given that grebes fly relatively infrequently and at night and acknowledge the theoretical approach taken at Druim Ba Wind Farm which assessed the risk based on assumptions about grebe flights taken from the literature and from expert opinion. We were broadly in agreement with those assessments and considered it highly unlikely that a significant number of flights would pass through the Druim Ba turbine array. However, we remain concerned that, even though it may be difficult to prove otherwise, the theoretically low risk of collision may be incorrect, particularly if grebe numbers begin to increase and/or new sites become colonised. Given the very small population size of the Slavonian grebe, even a low risk of collision would cause an impact on the overall sustainability of the population.

Given the uncertainty regarding impacts on grebes, should the development proceed we would urge the developer to consider incorporating a range of measures to benefit Slavonian grebe, including direct habitat management and wider research. We consider this work vital to help counteract any unforeseen adverse impacts that may arise from the windfarm development and to gain knowledge that could be used for the wider conservation of Slavonian grebes. Slavonian grebes have undergone a decline as a UK breeding species and, whilst our understanding of the causes of this is improving, much still needs to be done, and work both at the site level and more widely is required.

Survey Methodology

One purpose of scoping is to discuss and agree appropriate methods of impact assessment, including survey methodology. However in this case, we note that field surveys (including vantage point, breeding bird, and black grouse surveys) have already been carried out. This scoping exercise is therefore unfortunately of less use than it would have been if sought before the surveys were commenced.

Although only limited information and results are available at this stage, we are generally happy with the scope of survey work undertaken. However, the initial vantage points undertaken from Sept 2018-June 2019 did not achieve full coverage of the proposal area, and although these were then adapted to achieve better coverage, the survey work is proposed to continue only until August 2019. Whilst the historic survey data from the original wind farm provides useful baseline data, this survey work is now out of date and post-construction monitoring does not fully cover the proposed site. We would therefore recommend that survey work is undertaken for a second breeding season given the number of priority species present within the survey area and the lack of coverage of part of the development area. We recommend that more information is provided within the EIA report to demonstrate that the survey data are adequate, robust and accurate including:

- Full information on the VP work undertaken, including dates, times and weather conditions
- Maps showing VP locations that also denote viewsheds
- Worked example(s) of collision risk calculations
- Provision of raw data in order for independent verification of collision risk calculations

Peatland and carbon balance

Wind farms on sensitive peatlands and deep peat can significantly undermine the climate benefits of renewable energy and as such we welcome the commitment by the applicant that turbines will be sited to avoid the areas of deeper peat as far as possible, and measures should be taken to minimise peat disturbance.

RSPB Scotland recommends that a carbon calculation in line with current best practice is undertaken to determine the 'carbon payback period' over the operational life of the development. We recommend that the carbon calculator is used as early as possible in the planning process, to inform siting and micrositing of both turbines and tracks and other infrastructure, and not simply undertaken after the site layout has been determined. RSPB

Scotland considers that the maximum payback period should be six months as a maximum and should ideally be as close to zero as possible.

A suitable area of modified blanket bog should be identified and restored as compensation for the loss of any functioning blanket bog which cannot be avoided. Our experience of working on bog restoration shows that it is not possible to recreate this habitat from excavated, stored peat. The compensatory area should be assessed for suitability and agreed with the planning authority in consultation with SNH. This should be discussed in the EIA report.

Mitigation and Habitat Management Plan

The EIA Report should include a full survey, impact assessment and proposals for mitigation/enhancement in relation to important habitats and species on this site, including a specific plan for Slavonian grebe as identified above.

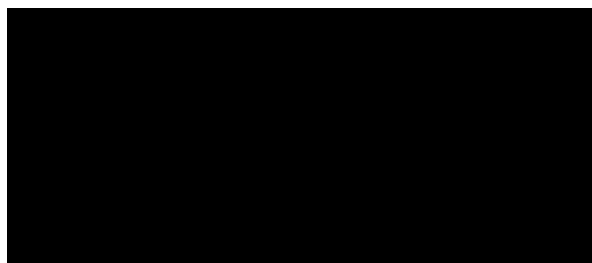
We request that a detailed Habitat Management Plan (HMP) is prepared and submitted with any application that comes forward.

Cumulative Impacts

Cumulative impacts on species that are sensitive to wind energy developments should be assessed across the Natural Heritage Zone.

We hope you find these comments helpful. Should you wish to discuss any of the above please do not hesitate to contact me.

Yours sincerely





[REDACTED]

[REDACTED]

06/08/2019

Dear [REDACTED]

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
BHLARAI DH WIND FARM EXTENSION**

Thank you for your email of 17 July 2019 requesting a scoping response for the above proposed wind energy development.

In this outline scoping response we have focussed on the immediate area of the proposed application. If required by the applicant to inform their Environmental Impact Assessment, maps of a wider search area are available from the Society, alongside a more detailed response.

The National Catalogue of Rights of Way (CROW) shows HI71, in part, is affected by the subjects outlined in red on *Figure 1.1 Site Location Plan*. This is listed in CROW as an “other route”, which means that although it does not meet all the criteria to be recognised as a right of way it is seen as an important local route. A map is enclosed showing HI71 highlighted in green. As there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded as they have not yet come to our notice.

You will no doubt be aware there may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. It is also worth bearing in mind Core Paths Plans, prepared by local authorities as part of their duties under this Act.

Although we understand that there is very little guidance regarding the siting of turbines in relation to established paths and rights of way, we would like to draw your attention to the following:

Extract from the Welsh Assembly Government’s Technical Advice Note on Renewable Energy (TAN 8)

Proximity to Highways and Railways

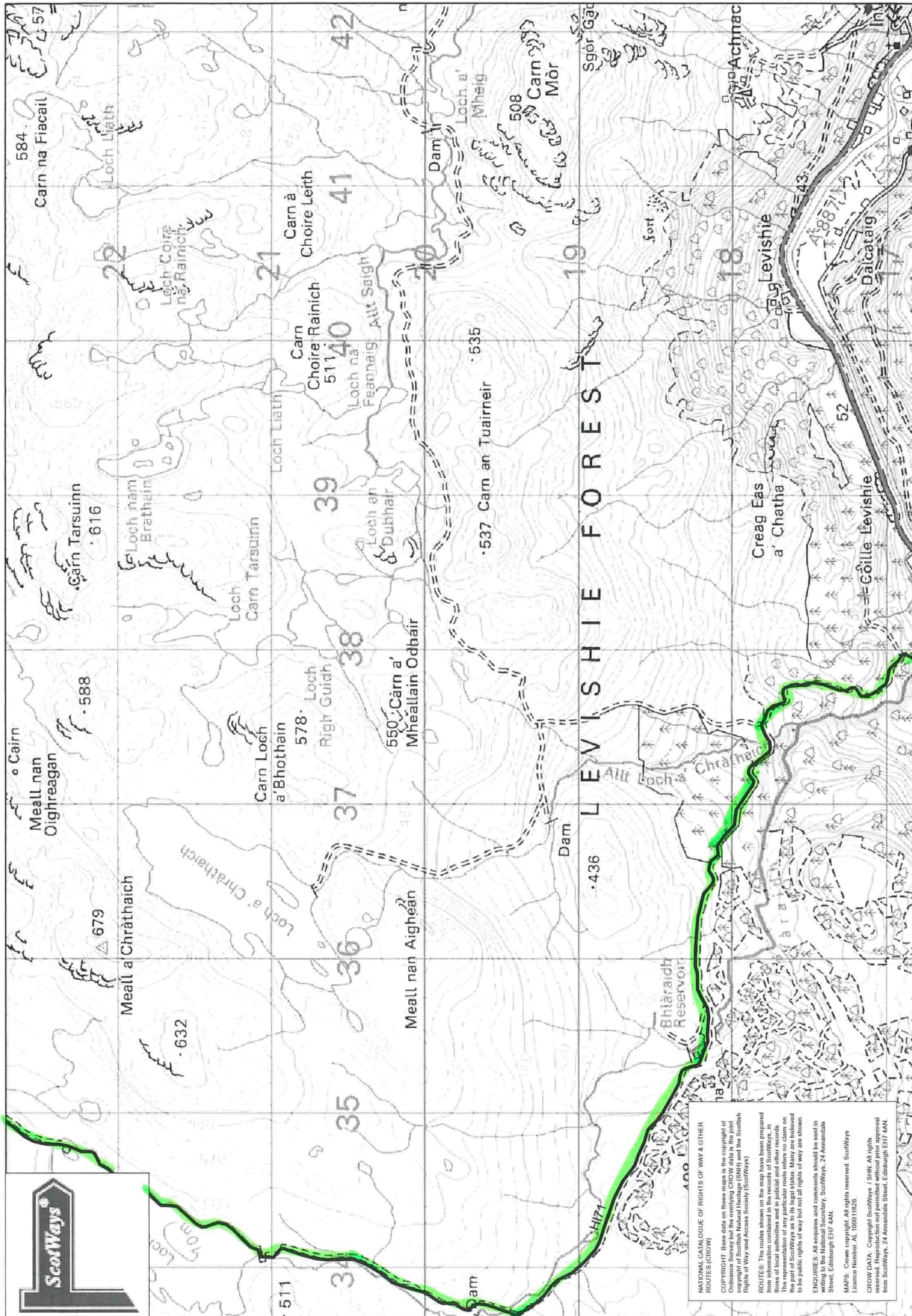
2.25 It is advisable to set back all wind turbines a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.

The Society is aware of several wind farm developments, at different stages in the planning process, in the local area. We ask that the cumulative impact of these proposed, and any consented, developments is taken into account.

I hope the information provided is useful to you. Please do not hesitate to contact me if you need more detail or if you have any queries.

Yours sincerely,

A black rectangular redaction box covering the signature area.



NATIONAL CATALOGUE OF RIGHTS OF WAY & OTHER ROUTES (CROW)
 COPYRIGHT: Base data on these maps is the copyright of Ordnance Survey but the copyright CROW data is the joint copyright of Scottish Natural Heritage (SNH) and the Scottish Rights of Way and Access Society (ScotWays)
 ROUTES: The routes shown on the map have been prepared from information contained in the records of ScotWays, in those of local authorities and in judicial and other records on the part of ScotWays as to its legal status. Many are followed to the public rights of way but not all rights of way are shown.
 ENQUIRIES: All enquiries and comments should be sent in writing to the National Secretary, ScotWays, 24 Armandale Street, Edinburgh EH7 4AN.
 MAPS: Crown copyright. All rights reserved. ScotWays License Number: AL 00011826.
 CROW DATA: Copyright ScotWays / SNH. All rights reserved. Reproduction not permitted without prior approval from ScotWays, 24 Armandale Street, Edinburgh EH7 4AN.

30th July 2019



Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379

www.scottishwater.co.uk

Dear [REDACTED]

**IV63 Invermoriston Glenmoriston Bhlaraidh Farm
PLANNING APPLICATION NUMBER: ECU0001900
OUR REFERENCE: 780083
PROPOSAL: Bhlaraidh Wind Farm Extension**

Please quote our reference in all future correspondence

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Infrastructure close to boundary

According to our records, the development proposals may impact on existing Scottish Water assets.

The applicant should identify any potential conflicts with Scottish Water assets [REDACTED]

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Scottish Water Disclaimer

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."



Drinking Water Protected Areas

A review of our records indicates that the proposed activity within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness supplies Invermoriston Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778**.

It is a relatively large catchment and the activity is sufficient distance from the intake that it is likely to be low risk.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm.

We welcome that reference has been made to the Scottish Water drinking water catchment.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will **not** accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted. Greenfield sites will not be considered and a connection to the combined network will be refused.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- **Scottish Water asset plans can be obtained from our appointed asset plan providers:**






If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk

Yours sincerely





The Coal
Authority

Resolving the **impacts** of mining

A69
200 Lincoln Lane
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[REDACTED]

[REDACTED]

18 July 2019

Dear [REDACTED]

Your reference: ECU00001900

ELECTRICITY ACT 1989

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS
2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAI DH
WIND FARM EXTENSION**

Thank you for your notification of 17 July 2019 seeking the views of the Coal Authority on the above.

I have checked the site location plan (Figure 1.1- Site Location Plan) against the information held by the Coal Authority and can confirm that the proposed development site is located outside of the defined coalfield. Accordingly, I can confirm that the Coal Authority has no comments or observations to make on this proposal.

In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the Project. This letter can be used as evidence for the legal and procedural consultation requirements.

Yours sincerely

[REDACTED]

[REDACTED]

09 August 2019

[REDACTED]

Proposed Bhlaraidh Wind Farm Extension, Scottish Highlands

Thank you for giving VisitScotland the opportunity to comment on the above wind farm development.

Our response focuses on the crucial importance of tourism to Scotland's local and national economy, and of the natural landscape for visitors.

Background Information

VisitScotland, as Scotland's National Tourism Organisation, has a strategic role to develop Scottish tourism in order to get the maximum economic benefit for the country. It exists to support the development of the tourism industry in Scotland and to market Scotland as a quality destination.

While VisitScotland understands and appreciates the importance of renewable energy, tourism is crucial to Scotland's economic and cultural well-being. It sustains a great diversity of businesses throughout the country. According to a recent independent report by Deloitte, tourism generates £11 billion for the economy and employs over 200,000 - 9% of the Scottish workforce. Tourism provides jobs in the private sector and stimulates the regeneration of urban and rural areas.

One of the Scottish Government and VisitScotland's key ambitions is to grow tourism revenues and make Scotland one of the world's foremost tourist destinations. This ambition is now common currency in both public and private sectors in Scotland, and the expectations of businesses on the ground have been raised as to how they might contribute to and benefit from such growth.

Importance of scenery to tourism

Scenery and the natural environment have become the two most important factors for visitors in recent years when choosing a holiday location.

The importance of this element to tourism in Scotland cannot be underestimated. The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product: a large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling wildlife watching and visiting historic sites.

The VisitScotland Visitor Experience Survey (2015/16) confirms the basis of this argument with its ranking of the key factors influencing visitors when choosing Scotland as a holiday location. In this study, over half of visitors rated scenery and the natural environment as the main reason for visiting Scotland. Full details of the Visitor Experience Survey can be found on the organisation's corporate website, here:

<http://www.visitscotland.org/pdf/Revised%20Oct%2012%20%20Insights%20Wind%20Farm%20Topic%20Paper.pdf>

Taking tourism considerations into account

We would suggest that full consideration is also given to the Scottish Government's 2008 research on the impact of wind farms on tourism. In its report, you can find recommendations for planning authorities which could help to minimise any negative effects of wind farms on the tourism industry. The report also highlights a request, as part of the planning process, to provide a tourism impact statement as part of the Environmental Impact Analysis. Planning authorities should also consider the following factors to ensure that any adverse local impacts on tourism are minimised:

- The number of tourists travelling past en route elsewhere
- The views from accommodation in the area
- The relative scale of tourism impact i.e. local and national
- The potential positives associated with the development
- The views of tourist organisations, i.e. local tourist businesses or VisitScotland

The full study can be found at www.scotland.gov.uk/Publications/2008/03/07113507/1

Conclusion

Given the aforementioned importance of Scottish tourism to the economy, and of Scotland's landscape in attracting visitors to Scotland, VisitScotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full. This includes when taking decisions over turbine height and number.

VisitScotland strongly agrees with the advice of the Scottish Government –the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.

VisitScotland would also urge consideration of the specific concerns raised above relating to the impact any perceived proliferation of developments may have on the local tourism industry, and therefore the local economy.

We hope this response is helpful to you.

Yours sincerely

██████████

██████████
██
██████████

transport.gov.scot

Your ref:
ECU00001900

Our ref:
TS00538

Date:
02/08/2019

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAI DH WIND FARM EXTENSION

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by ITP Energised in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

The proposed development will form an extension to the operational 32 turbine Bhlaraidh Wind Farm, located on the Glenmoriston Estate near Invermoriston. It will comprise 20 turbines with a blade tip height of up to 180m and a rotor diameter of up to 158m. The nearest trunk road to the site is the A887(T), which is located approximately 4km to the south at Invermoriston.

Assessment of Environmental Impacts

The SR indicates that the forthcoming Environmental Impact Assessment Report (EIAR) will be based upon the Institute of Environmental Management and Assessment (IEMA) Guidelines.

It is also noted that environmental impacts such as driver delay, pedestrian amenity, severance, safety etc will be considered and assessed where appropriate, using the IEMA Guidelines which specify that road links should be taken forward for assessment if:

- Traffic flows will increase by more than 30%, or
- The number of HGVs will increase by more than 30%, or
- Traffic flows will increase by 10% or more in sensitive areas.

This approach is considered acceptable, and in the event that the above thresholds are not exceeded, Transport Scotland is content that no further detailed assessment of environmental impacts (associated with increased construction traffic) is required in relation to the trunk road network and its adjacent receptors.

Abnormal Load Assessment

We understand that the turbine components for the operational development were delivered from both Kyle of Lochalsh port via the A87(T) and A887(T), and Inverness port via the A82(T) and A887. The SR states that both ports will be considered and assessed as candidate ports of entry alongside other suitable ports to establish suitable turbine component transportation routes. Once the routes are confirmed, an Abnormal Load Route Survey Report will be prepared. While this is considered appropriate, Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path.

We would request, therefore, that the Abnormal Loads Assessment report identify 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.

The SR states that a Traffic Management Plan (TMP) would be prepared prior to the commencement of the Proposed Development. Transport Scotland would ask that this document be discussed and agreed with the Trunk Road Area Manager, details as follows:

A87(T), A82(T) and A887(T) - [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

Our ref: FL/15-7

August 6th 2019

Dear [REDACTED]

BHLARAI DH WIND FARM EXTENSION, INVERMORISTON

Thank you for seeking comment from Marine Scotland Science (MSS) on the scoping report for the proposed Bhlaraidh wind farm extension in relation to freshwater and diadromous fish and fisheries.

The proposed development area is within the catchments of Allt Saigh and River Moriston, the latter is a SAC for which salmon is a qualifying feature; salmon and trout are also listed as priority species for conservation in the Scottish Biodiversity List and therefore MSS advises that the potential impacts on both salmonid species are considered throughout the EIA.

MSS further advises that the developer consults our generic scoping and monitoring guidelines (<http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) and carries out the following in the EIA:

- as outlined in MSS's guidelines, site characterisation surveys (including electrofishing surveys) to assess the water quality and the presence and abundance of fish species in watercourses within and downstream of the proposed development area to enable an assessment of the potential impact of the development on the water quality and fish populations. The results from these site characterisation surveys should be



presented in the EIAR along with a detailed description of proposed mitigation measures and monitoring programmes;

- considers the potential cumulative impact of adjacent developments (operational and consented) on the water quality and fish populations, including the selection of control sites in the proposed monitoring programmes; and
- contacts the Ness District Salmon Fishery Board and the Ness and Beaully Fisheries Trust, if not already done so, for further information and/or advice on local fish populations.

Kind regards,

[REDACTED]



Scottish
Forestry
Coilltearachd
na h-Alba

Highland & Islands Conservancy
Woodlands
Fodderty Way
Dingwall
Ross-shire
IV15 9XB



18th of July 2019



Thank you for consulting Scottish Forestry on the EIA Scoping Report for Bharaidh Wind Farm (the proposed development), ref: ECU00001900.

Scottish Forestry (SF) is the Scottish Government agency responsible for policy, support and regulation of forestry sector in Scotland. As such SF comments on possible impact of development proposals on forests and woodlands.

The proposed development, as described in EIA Scoping Report (July 2019) and presented on the scoping maps (Figures 1.1 & 5.2) is located out-with the afforested area. The above mentioned EIA Scoping Report states, in sections 15.8.1 & 15.8.2, that there are no areas of commercial forestry and no tree coverage within proposed development's boundaries, hence no tree felling will be required to facilitate the proposed development. However section 15.8.3 mentions possibility of requirement for tree felling to accommodate transportation of turbine components, which will be considered in technical appendix Abnormal Load Survey Report.

Scottish Forestry confirms that given the proposed development's site location and characteristics, it is appropriate to scope forestry out of the Environmental Impact Assessment (15.8.5) and that it is also appropriate to scope out an assessment of the impact of felling and compensatory planting plan (15.8.6).

SF has no further comments to make at this stage, however would like to be included in the consultation process if any changes are made to the currently proposed site layout and/or access routes.

Please don't hesitate to contact me if you have any questions.

Kind regards



Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation

S e Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd



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