

CHAPTER 6: SCOPE AND CONSULTATION

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6. SCOPE AND CONSULTATION

6.1 Introduction

6.1.1 In general the EIA Regulations require that an EIA should describe the likely significant effects of a proposed development on the environment. Scoping of potential issues against the physical and operational aspects of a proposed development provides a basis for ensuring that the assessment of environmental effects is appropriately limited to issues of genuine potential significance. In relation to applications under s.36C of the Electricity Act, including the present application, the EIA Regulations require the EIA Report to describe the main respects in which it is considered that the likely significant effects on the environment of the Proposed Varied Development would differ from those described in any EIA report or environmental statement that was prepared in connection with the relevant s.36 consent. This ensures a proportionate approach focussed on likely significant effects that have not already been considered.

6.1.2 This Chapter describes the pre-application consultation process that was undertaken to determine the scope of the EIA Report, and the consultations that were undertaken to inform the local community of the proposed variation. This Chapter also includes a brief description of the environmental features of potential significance associated with the Proposed Varied Development which are to be addressed in detail in the EIA Report, and those that are scoped out.

6.2 Pre-Application Consultation

6.2.1 To discuss and agree the proposed scope of the EIA Report, a pre-application meeting was held with statutory consultees, including The Highland Council (THC), Scottish Natural Heritage (SNH), Scottish Environment Protection Agency (SEPA) and the Energy Consents Unit, on 29th August 2018.

6.2.2 Following the meeting a Pre-Application Advice Pack (referred to hereinafter as ‘the Advice Pack’ and included in this EIA Report as Appendix 6.1) dated 25th September 2018 (Reference Number 18/03782/PREAPP) was issued by THC. The Advice Pack provides specific feedback on the information requested to be included in the EIA Report by key stakeholders.

6.2.3 A summary Pre-Application Response Matrix detailing how and where each point raised in the Advice Pack is dealt with in the EIA Report (or has been dealt with elsewhere e.g. through a mitigation commitment or an existing Condition of Consent) is included in Table 6.1 below (see Appendix 6.2: Pre-Application Response Matrix for a detailed version). Consultation responses are also detailed at the start of each specialist chapter, where relevant.

Table 6.2: Pre-Application Response Matrix

Consultee / Page Reference	Comments Raised / Request	Response / How it is addressed in the EIA Report
THC – Planning Policy (7)	This application should be considered against the following Development Plan documents	Planning policy is considered in Chapter 5 and within the supporting Planning Statement.
THC – Planning Policy (7)	Visualisations provided should accord with the Council’s latest Visualisation Standards for Wind Energy Developments.	Visualisations prepared in accordance with the Council’s Visualisation Standards are included in Volume 3B: Visualisations (THC Methodology).
THC – Planning Policy (7)	The proposal should maintain an up to date picture of development in the wider area, particularly for informing	The cumulative baseline situation has been reviewed and remains unchanged within close proximity to the site from that

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	cumulative impact assessment.	assessed in the 2015 ES. Cumulative effects of the Proposed Varied Development are assessed where relevant in the EIA Report.
THC – Planning Policy (7)	The site lies predominantly within a Group 2 Area of Significant Protection. It will be necessary to assess the impacts on all Group 2 features, identify appropriate mitigation, and set out how this mitigation provides sufficient protection to the feature.	The wind farm infrastructure impact on all Group 2 features was assessed in the 2015 ES. The Proposed Varied Development changes reduce the amount of infrastructure and thereby reduce impact on Group 2 features. Condition 23 will remain to provide a CEMP that will direct and provide a control mechanism for the impact of construction activities on the environment.
THC - Policy and Natural Heritage (Landscape) (7)	The applicant should outline whether the new scheme is expected to have a positive or negative impact on each of the relevant Supplementary Guidance (SG) criterion (see pages 18-20 of the SG) compared to the consented scheme.	Planning policy is considered in Chapter 5 and within the supporting Planning Statement, while the positive or negative impacts are considered in the Planning Statement.
THC - Policy and Natural Heritage (Landscape) (7)	This proposal is immediately adjacent to existing schemes, and opportunities to share existing infrastructure should be explored and where opportunities are not taken, a reasoned justification should be provided.	The Proposed Varied Development maintains use of existing infrastructure, namely tracks, substation and Borrow Pits.
THC - Sustainability (8)	The Council’s Sustainable Design Guide: Supplementary Guidance provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development.	The Supplementary Guidance has been noted and where relevant taken into account in developing the proposals.
Scottish Natural Heritage (9)	The impacts of this development should be assessed against the Special Area of Conservation (SAC) as part of a Habitats Regulation Appraisal. A Species Protection Plan will be required within the EIA Report to ensure that this development can be taken forward with SAC otters living alongside. We also recommend that otter surveys within and adjacent to the development boundary should be updated to inform an appropriate mitigation plan.	The EIA Report includes an assessment of potential impacts on the SAC within Chapter 8: Ecology. An updated otter survey was carried out in October 2018, the results of which have informed the preparation of a Species Protection Plan (included as Appendix 8.1). A report to inform the HRA has also been produced as Appendix 8.3.
Scottish Natural Heritage (9)	We do not consider that additional bird survey work will be required to inform the impacts of this proposal, despite it being five years old. The original bird vantage point survey work covered the whole of the new swept area; therefore collision risk can be recalculated using the new turbine dimensions. In addition, the original	These comments were taken into account in the EIA process and in particular the production of Chapter 10: Ornithology. As discussed in Chapter 10 (para. 10.4.4 and 10.4.5), since the operation of Gordonbush Wind Farm, post-construction monitoring of the operational site has recorded golden eagle flight activity, initially during standard

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	survey work only recorded a single flight of an SPA qualifying species (i.e. golden plover). We therefore do not think it is reasonable to request additional bird survey work in this specific instance. However, the recalculated impacts of this development should be assessed as part of a Habitats Regulation Appraisal within the EIA Report.	vantage point watches and subsequently through targeted golden eagle surveys. The data showing golden eagle activity to the south and east of the Proposed Varied Development has therefore also been used to scope the assessment in terms of species covered. In light of the conclusions of Chapter 10 that there are no likely significant effects on the integrity or conservation objectives of the SPA a Habitats Regulations Appraisal is considered unnecessary.
Scottish Natural Heritage (9)	The wireframe view-points clearly indicate that the proposed scheme will reduce the visual spread of turbines from the consented layout. The loss of the four turbines and the increase in height of the remaining 12 ¹ are considered to result in an overall improvement in the layout and a slight reduction in the landscape and visual impact. This is likely to be especially the case for impacts identified on the qualities of the WLA. However, we continue to advise that there will be additional adverse landscape and visual effects as a result of this proposal, but these are not considered to exceed those of the original consented scheme.	The EIA Report includes a LVIA of the Proposed Varied Development in Chapter 7.
Scottish Natural Heritage (9)	Even though the previous bat survey found a healthy representation of animals using this upland site, we do not think completing another bat survey will necessarily make any difference to the layout. However, we do advise that turbine stand-off distances from bat features (e.g. minor water courses) should be re-assessed in relation to the wider rotor sweep of the larger turbines, taken from turbine tip.	The EIA Report assesses the potential effects on bats in light of the increased tip height/rotor dimensions in Chapter 8: Ecology, utilising existing survey data.
Scottish Natural Heritage (9)	Additional surveys will be required to ensure that water voles are safeguarded during construction works. Pre-construction surveys should take place to help inform a Species Protection Plan, if one is required.	A commitment to carry out pre-construction surveys for water voles is made within the CEMP, secured through Condition 23.
Scottish Natural Heritage (9)	Since this original extension went to planning much of our guidance on wind farms has since been updated.	This has been noted and updated guidance taken into account as necessary.

¹ The Proposed Varied Development is actually for 11 turbines, not the 12 noted in SNH's comments.

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THC (Design) (10)	The Design Quality and Place Making policy (Policy 29) in the HwLDP requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.	Condition 13 requires all details of buildings, compounds and parking areas to be approved by the Planning Authority prior to development commencing. There is no proposal to vary the terms of Condition 13. The Proposed Varied Development seeks to remove the consented additional Operations Building.
THC – Amenity (Noise) (11)	The applicant will be required to submit a noise assessment with regard to the operational phase of the development in order to demonstrate any change in predicted noise levels as a result of the proposed amendment. The existing consent already has noise limits attached and the expectation is that noise levels will be lower due to the reduction in turbines and the increase in separation distances. If there have been any other wind turbine developments consented since the original Gordonbush Extension application obtained consent any cumulative noise would need to be addressed by the assessment. The assessment must include a compliance monitoring mitigation scheme which will demonstrate how noise levels from the development will be identified should a complaint arise.	The EIA Report includes a Noise Impact Assessment (Chapter 13: Noise), including an updated cumulative assessment. Condition 25 is the subject of proposed variation and continues to follow IOA Good Practice guidance for compliance monitoring mitigation for noise.
THC – Amenity (Noise) (11)	Where there is potential for disturbance from construction noise the application will need to include a noise assessment.	The EIA Report includes an updated assessment on construction noise in Chapter 13: Noise.
THC – Amenity (Private Water Supplies) (11)	The application should include updated information on the presence of any private water supplies that could be affected by the development.	Private water supply data has been requested from SEPA and THC. A review of this data in light of the Proposed Varied Development has been undertaken and is reported on within Chapter 9: Hydrology, Hydrogeology and Geology).
THC – Amenity (Dust) (11)	Any application should include a scheme for the suppression of dust.	A dust management plan will be prepared as part of the CEMP, in accordance with Condition 23.
THC – Transport and Wider Access (Traffic and Transport) (12)	The access is the same as for the existing windfarm and the permitted extension. Revised swept paths will be required to be submitted with any application for the larger turbines.	A swept path assessment is included within Appendix 12.1: Route Survey Report.
THC – Transport and	The EIA shall include a Transport Assessment. This shall consider in	The EIA Report includes an updated Transport Assessment to reflect the

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Wider Access (Traffic and Transport) (12)	detail the impact of development traffic on the Council maintained roads affected. It shall consider and propose measures necessary to mitigate the impact of the development. It is acknowledged that a reduced scope may be applicable due to the extant permissions.	proposed variation. Any mitigation measures will be controlled through Condition 17, to which no variations are proposed.
THC – Transport and Wider Access (Traffic and Transport) (12)	<p>The port of entry shall be identified for the abnormal loads. Routes for goods vehicles as well as the abnormal loads shall be confirmed and where additional traffic or larger loads are proposed then the suitability of the routes for the additional traffic shall be assessed.</p> <p>It appears that the original TA did not include ready mix concrete or import of stone for the access routes any assumptions regarding on site quarries or batching should be stated. The volume of construction traffic for the revised proposals should be submitted and any assumptions should be confirmed or a conservative approach taken.</p>	See Chapter 12: Traffic and Transport and Appendix 12.1: Route Survey Report.
THC – Transport and Wider Access (Traffic and Transport) (12)	A new assessment of the suitability of the routes covering bridges and other structures will be required as these proposals are for larger turbines. A swept path analysis of the route will be required.	See Appendix 12.1: Route Survey Report.
THC – Transport and Wider Access (Traffic and Transport) (12)	<p>Where road improvements are outside the current road boundary, the red line boundary of the application will need to cover them or separate planning permission will be required. The scope of any mitigation works and control of the land required should be demonstrated in the planning application.</p> <p>All works on the Council maintained public road will require the approval of the Council as Roads Authority. Therefore detailed and dimensioned plans showing any mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.</p>	No change to the redline application boundary is sought under the s.36C application. Any works outside of the current road boundary will be evaluated to determine if planning permission is required. The implementation of any mitigation measures will be controlled through Condition 17.
THC – Transport and Wider Access (Traffic and Transport)	A framework CTMP aimed at minimising the impact of the construction traffic should be undertaken. Consultation with the local community and the Local Area	Condition 17 requires the production of a Traffic Management Plan prior to the Commencement of Development.

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(12)	Roads Office will be required.	
THC – Transport and Wider Access (Traffic and Transport) (12)	In order to protect the interests of the Council, as roads authority, a suitable agreement relating to Section 96 of the Roads (Scotland) Act may be required. Construction should not run concurrently with other projects generating a significant increase in HGV traffic, alternatively a joint CTMP and Wear and Tear Agreement would be required.	Condition 17 requires the production of a Traffic Management Plan, including the provision of a bond or similar.
Transport Scotland (12)	Transport Scotland is in agreement with the proposed approach, with the proviso that an Abnormal Indivisible Load Assessment be provided to confirm that the proposed route is capable of accommodating the larger turbine components to ensure that transportation will not have any detrimental effect on structures within the trunk road route path.	The EIA Report includes an Abnormal Indivisible Loads Assessment (See Appendix 12.1: Route Survey Report).
THC – Water (Flood Risk) (13)	Should any infrastructure be located within close proximity to a watercourse, a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere.	The 2015 ES concluded that there are no potential sources of flood risk to the development site. These results were reviewed in relation to the Proposed Varied Development and reported on within Chapter 9.
THC – Water (Flood Risk) (13)	Analysis of the impact of any proposed new bridges/crossings should be submitted for review.	No additional crossings are proposed.
THC – Water (Flood Risk) (13)	We would request that a Drainage Impact Assessment (DIA) is submitted. The Applicant should demonstrate any mitigation measures to manage the residual risk of overland flow/pluvial flooding.	The Proposed Varied Development would result in less of an impact to hydrology in terms of reduced track length and reduced number of turbines. Flood risk is discussed in Chapter 9. A drainage strategy will be prepared as part of the CEMP, in accordance with Condition 23.
THC – Water (Flood Risk) (13)	A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse/waterbody. Storage of materials within this area during construction is not permitted.	The design of the consented turbine layout identified a 50m buffer between all watercourses visible on OS 1:50,000 mapping and the positioning of a turbine. Condition 11 requires any micro-siting of turbines, access tracks and crane hard standing areas to maintain the 50m buffer, except in the vicinity of approved crossing points.
SEPA – Site Specific Requirements (13)	SEPA requested that the planning conditions require: <ul style="list-style-type: none"> • Approval of a full site specific CEMP prior to commencement of the development; • All works be carried out in 	Conditions 8, 11 and 23 cover these requirements with the exception of the floating track on peat greater than 1m deep requirement. Generally, a ‘floating track’ design does not involve excavation and would be utilised on the site in areas where peat depth is greater

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	<p>accordance with the Schedule of Mitigation;</p> <ul style="list-style-type: none"> • A condition enabling micro siting of the built elements up to 50m to allow for avoidance of sensitive features; • A finalised Peat Management Plan be agreed with the Planning Authority in consultation with SEPA; • New tracks on peat greater than 1m be of a floating style of construction; • A 50m buffer around all waterbodies except in the vicinity of watercourse crossings; and • A Decommissioning and Restoration Plan be prepared and submitted at least two years prior to the end of the design life of the development. 	<p>than 1m, where practical. Geotextile material is laid onto the unbroken existing surface at a width to suit the track. Layers of crushed stone would then be laid on the geotextile to form a track capable of supporting the turbine delivery vehicles and construction plant. This type of track construction is typically used in peaty areas across Scotland including other constructed wind farm developments and public roads. The benefits of the floating track design are that it allows access track construction on soft terrain and does not require excavation of deep peat as the surface layer is not broken, resulting in reduced peat volumes for re-use across the site. There is minimal disruption of the sub-surface flow of water within the peat body, and no new channels are formed by which water can drain from the peat mass.</p>
SEPA – Site Specific Requirements (13)	SEPA noted that the Consented Development did not include a condition requiring all new tracks on peat of greater than 1m to be of a floating style of construction. SEPA ask that this condition be adopted.	This principle will be adopted where practicable, and is relevant to Condition 23, which requires the production of a Peat Management Plan. Whilst the Applicant will endeavour to float all tracks on peat with a depth greater than 1m, this is not always feasible due to peat stability risk associated with a combination of peat depth, gradient and underlying soil parameters. In addition, consideration will be given to the transition lengths between floating and founded track construction where a proportion of this transition may be in areas where the peat is in excess of 1m. Where isolated pockets of peat are greater than 1m in depth it may not be possible to transition from a cut track to a floated track due to the length of transition required.
SEPA – Site Specific Requirements (13)	The amount of disturbed peat should be accounted for in the conditioned peat management plan.	A peat management plan will be prepared as part of the CEMP, in accordance with Condition 23.
SEPA – Site Specific Requirements (13)	SEPA’s guidance on the life extension and decommissioning of onshore wind farms that must be taken into account.	Condition 8 requires a decommissioning, restoration and after care strategy to be developed in agreement with THC, SEPA and SNH.
SEPA – Site Specific Requirements (13)	A Construction Site Licence under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) may be required.	This is noted and would be applied for as required.
SEPA –	Existing built infrastructure should be	As stated above where existing

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Detailed Generic Scoping Requirements for Windfarm Development (13)	re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works in previously undisturbed ground.	infrastructure is in place following the construction of Gordonbush Wind Farm, this has been considered for re-use where practicable in the construction and operation of the Consented Development (see Chapter 4: Description of Development). The infrastructure footprint of the Proposed Varied Development, compared to the Consented Development, is reduced overall.
SEPA – Site Layout (13)	Cabling must be laid in ground already disturbed such as verges.	Cabling would be laid in trenches of varying width (depending on the number of cables) and approximately 1m in depth alongside the site access tracks where suitable, or otherwise unless agreed in writing with the Highland Council in consultation with SEPA (see Condition 11: Micrositing, subject to variation as per Appendix 1.2). These trenches would also carry earthing and communications cables.
SEPA – Engineering activities which may have adverse effects on the water environment	Where activities such as watercourse crossings, watercourse diversions, water abstractions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and appropriate mapping in accordance with SEPA’s requirements.	A drainage strategy and details of watercourse crossings will be prepared as part of the CEMP in consultation with SEPA, in accordance with Condition 23.
SEPA – Engineering activities which may have adverse effects on the water environment (13)	Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.	No new watercourse crossings are required for tracks. The Consented Development access tracks were designed to ensure that no new watercourse crossings are required by utilising the existing access tracks constructed as part of the adjacent Gordonbush Wind Farm.
SEPA – Engineering activities which may have adverse effects on the water environment (13)	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.	The 2015 ES concluded that there are no potential sources of flood risk to the development site. Flood risk is discussed in Chapter 9.
SEPA – Disturbance and re-use of excavated peat and other carbon rich soils (13)	The planning submission should 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.	The Proposed Varied Development seeks no change to the position of turbines, tracks, or borrow pits but reduces the amount of infrastructure in terms of tracks and turbines. In addition to the assessment of the reduced layout a) is reported within the 2015 ES (Consideration of Alternatives), and for b) measures will be included within the

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		CEMP (Condition 23), and specifically the Peat Management Plan. Therefore the 2015 ES is relied upon.
SEPA – Disturbance and re-use of excavated peat and other carbon rich soils (13)	<p>The submission must include:</p> <p>a) A detailed map of peat depths (following the survey requirement of the Scottish Government’s Guidance on Developments on Peatland - Peatland Survey (2017)) demonstrating how the development avoids areas of deep peat and other sensitive receptors.</p> <p>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 any peat to be re-used and how it will be kept wet must be included.</p>	<p>The position of the turbines, tracks and borrow pit search areas will be as per the Consented Development, albeit the number of turbines and track length is reduced (see Figure 1.3). Therefore, it is not considered necessary to provide this information again. An updated Peat Management Plan would be prepared as part of the pre-construction CEMP, secured under Condition 23.</p>
SEPA – Disruption to Groundwater Dependant Terrestrial Ecosystems (GWDTE) (13)	<p>The following information must be included in the submission:</p> <p>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 water 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.</p> <p>b) If the above minimum buffers 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.</p>	<p>The position of the turbines tracks and borrow pit search areas will be as per the Consented Development, albeit the number of turbines and track length is reduced. Therefore, the 2015 ES is relied upon and it is not proposed to provide this information again. Condition 11 provides the mechanism for micro-siting of turbines, access tracks and crane hard standing areas where required. Measures to protect GWDTE in relation to borrow pits are also secured through Condition 14.</p>
SEPA – Forest removal and forest waste (13)	<p>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.</p>	<p>Not applicable as no felling proposed.</p>
SEPA – Borrow pits (13)	<p>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. A map of all proposed</p>	<p>Borrow Pit Search Areas are as detailed in the 2015 ES. Condition 14 requires a working and restoration plan for each borrow pit. A Borrow Pit Report is included in Appendix 9.1 of this EIA Report. Any further information will be provided in accordance with Condition 14 prior to</p>

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	borrow pits must be submitted.	construction.
SEPA – Regulatory requirements (13)	Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands.	This is noted and all necessary authorisations will be applied for.
THC – Historic Environment (14)	<p>The Cultural Heritage should be assessed as part of an Environmental Statement and undertaken by a professional and competent historic environment consultant. The ES chapter will need to follow Highland Council Standards for Archaeological Work.</p> <p>The assessment will include a walkover survey of the development area (including any land required for associated infrastructure) to assess the survival of any upstanding features. It will consider the potential direct impacts of the development to cultural heritage as well as indirect impacts. The indirect impact assessment must include a study of cumulative impacts. Where indirect impacts are predicted, these will be illustrated using photomontages.</p>	<p>Given that turbine, tracks and borrow pits positions remain unchanged from the Consented Development, with reduced turbine numbers and track length, it is not proposed to carry out further assessment of direct effects. No significant direct effects were identified in the 2015 ES and it is not considered that the Proposed Varied Development would cause likely significant direct effects not already reported upon. Mitigation measures are secured through Condition 22 which requires a programme of works for the evaluation, preservation and recording of any archaeological and historic features affected.</p> <p>An assessment of indirect effects on cultural heritage is included within Chapter 11 in line with the points raised within the Advice Pack. Visualisations from Balnacoil Hill Cairn SM and Kilbraur Hut Circle SM are included, using photography undertaken for the 2015 ES.</p>
THC – Historic Environment (14)	Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (i.e. re-design) and where appropriate, compensatory/off-setting.	Condition 22 requires the production of a programme of work for evaluation, preservation and recording of any archaeological and historical features.
Historic Environment Scotland (14)	Further work should be carried out to identify if there is increased potential for the increased height of the turbines to have impacts on the setting of historic environment assets which were previously outside the ZTV or if there will be increased levels of effect on assets already identified.	An assessment of indirect effects on cultural heritage is included within Chapter 11 in line with the points raised within the Advice Pack. Visualisations from Balnacoil Hill Cairn SM and Kilbraur Hut Circle SM have been prepared, using photography undertaken for the 2015 ES.
Historic Environment Scotland (14)	Cumulative effects on the setting of historic environment assets should be re-assessed given the number and proximity of other operational, consented and proposed wind developments in the surrounding area, including the proposed South Kilbraur wind farm.	An updated cumulative assessment in relation to indirect effects is included within Chapter 11: Cultural Heritage.
THC – Pre-application	It would be advisable to undertake public consultation of the proposals	A public exhibition event was held within the local area to allow members of the

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procedures / guidance (16)	develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application.	general public to obtain information and pass comment upon the Proposed Varied Development. This exhibition took place on the 29th October 2018 at Brora Community Hall (3pm to 7pm). See paragraph 6.2.4 to 6.26.
THC – Pre-application procedures / guidance (16)	In terms of the appropriate Community Councils to consult, the proposal is located within the Brora Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted.	Community engagement was carried out as part of the application process and this engagement included discussion with Community Councils (see paragraph 6.2.4 to 6.26).
THC – Any other appropriate information (17)	In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs - both internal and external - as part of your proposal.	Noted.

Consultation with the Local Community

6.2.4 A public exhibition event was held within the local area to allow members of the general public to obtain information and pass comment upon the Proposed Varied Development. This exhibition took place on the 29th October 2018 at Brora Community Hall (3pm to 7pm). Feedback received at the exhibition included:

- Delighted to see the project progressing;
- Community has really benefited from community benefit from Gordonbush Wind Farm;
- Concern about turbine delivery route and keen to find out more about delivery of turbines and how this will be communicated to local communities; and
- Increased turbine height could have an increased effect on people who use the area for recreation, compared to the Consented Development.

6.2.5 A meeting was held with Golspie Community Council on the 10th December 2018 and Brora Community Council on the 15th January 2019, where the above points were generally reiterated. Further meetings with Rogart Community Council are scheduled early in 2019, following submission of the variation application.

6.2.6 The feedback received during the public exhibition event and community council meeting has been considered as part of this EIA Report. Appendix 12.1: Route Selection Report, confirms the route for turbine deliveries, whilst Condition 20 of the Conditions of Consent requires the Applicant to establish a community liaison group to facilitate communication with local communities during the construction phase. Chapter 7: Landscape and Visual, assesses the Proposed Varied Development from outdoor receptors.

6.3 Proposed Scope of the EIA Report

6.3.1 The following section provides a brief summary of the topics scoped into this EIA Report. For ease of reference, chapter numbers are consistent with the 2015 ES.

Landscape and Visual Impact Assessment

- 6.3.2 It was considered likely the Proposed Varied Development would result in a potential change to the assessment findings, as stated within the 2015 ES and 2016 FEI, therefore a Landscape and Visual Impact Assessment (LVIA) has been undertaken for the Proposed Varied Development (see Chapter 7). The LVIA includes ZTV diagrams, as well as photomontages and wirelines from viewpoint locations agreed in discussion with THC and SNH (and consistent with the 2015 ES).

Ecology

- 6.3.3 The Proposed Varied Development would result in a reduction in the overall habitat land take loss compared with the Consented Development, as a result of a reduction in overall track length and turbine bases/ crane hardstandings. The habitat loss calculations have been updated and documented within Chapter 8. A review of the Proposed Varied Development in relation to the Gordonbush Estate HMP management and objectives is discussed in Chapter 8, and a HMP for the Proposed Varied Development included in Appendix 8.2.
- 6.3.4 Otter surveys were undertaken within and adjacent to the development boundary to update previous survey results and help inform an appropriate species protection plan. An updated assessment was carried out to assess the effects of the Proposed Varied Development on otter, a qualifying species of the Caithness and Sutherland Peatlands SAC. The assessment of the potential effects against the SAC, focussing on otter, is included within Chapter 8: Ecology, and a species protection plan included in Appendix 8.1. This is in line with comments received by SNH in the Advice Pack.
- 6.3.5 A review of the assessment of effects on bats, and bat features (e.g. minor water courses) was undertaken (as requested by SNH in the Advice Pack) utilising previous survey data.
- 6.3.6 Mitigation measures such as the production of a Construction Environmental Management Plan (CEMP), the employment of an Ecological Clerk of Works (ECoW) during construction, pre-construction surveys for protected species and the following of best practice measures during construction are already committed to in order to minimise potential effects on habitats and protected species. Relevant Conditions of Consent to secure these mitigation measures include Conditions 23 and 24.

Ornithology

- 6.3.7 It was considered that as a consequence of the proposed variation, particularly the increased tip height and rotor diameter, that the likely significant effects of the Proposed Varied Development with respect to ornithology may differ from those already reported upon. An assessment of the potential effects of the Proposed Varied Development on ornithology has therefore been undertaken. An assessment of the Proposed Varied Development in relation to the SPA is included in Chapter 10: Ornithology. Mitigation measures previously identified are reviewed and updated as required.

Cultural Heritage

- 6.3.8 Given that the remaining turbine and access track positions remain unchanged from the Consented Development, albeit with reductions in the number of turbines and track length, it is not considered that the Proposed Varied Development would cause likely significant direct effects that differ from those already reported upon and therefore no further assessment of direct effects has been carried out. Whilst THC Historic Environment Team requested further survey and assessment (Advice Pack, see Appendix 6.1) no significant effects were identified in the ES 2015 and given the nature of the changes resulting from the Proposed Varied Development it was assessed that further survey and assessment was unnecessary as the same mitigation measures put forward for the Consented Development would be maintained. These mitigation measures have been secured by Condition 22 which requires a programme of works

for the evaluation, preservation and recording of any archaeological and historic features affected.

- 6.3.9 In relation to indirect effects, the Proposed Varied Development would result in a reduction in the extent and density of turbines visible from Scheduled Monuments, albeit that the remaining turbines would be increased in height and rotor diameter. It was considered that the likely significant indirect effects may differ from those already reported upon. An assessment of indirect effects on cultural heritage is therefore included within the EIA Report (see Chapter 11: Cultural Heritage). Visualisations from Balnacoll Hill Cairn SM and Kilbraur Hut Circle SM are included (Figures 11.2.1a to 11.3.3), using photography undertaken for the 2015 ES given that there are no notable changes in the views from these locations. The assessment of indirect effects is in line with the points raised within the Advice Pack.

Traffic

- 6.3.10 Due to the change in turbine tip height and rotor diameter it was considered that the likely significant effects with respect to traffic may differ in some aspects from those already reported upon. A traffic assessment has been undertaken for the Proposed Varied Development to assess potential effects on the local road network during the construction phase and a comparison made with previously identified effects (see Chapter 12). The assessment is supported by a swept path assessment, undertaken to review 'Points of Interest' in the delivery of larger turbines to site. This is included in Appendix 12.1: Route Survey Report.
- 6.3.11 This proposed scope is in line with the points raised within the Advice Pack.

Noise

- 6.3.12 A noise impact assessment has been undertaken for the Proposed Varied Development to confirm potential effects on nearby noise sensitive receptors, in line with advice provided within the Advice Pack (see Appendix 6.1). This is included in Chapter 13.

Other Issues

- 6.3.13 Other Issues of relevance to the Proposed Varied Development that are not covered within the other environmental chapters have been assessed in Chapter 14. These include:
- Telecommunications, Television / Radio;
 - Aviation (Civil and Military);
 - Shadow Flicker;
 - Ice Throw;
 - Air Quality;
 - Climate Change and Carbon Balance;
 - Population and Human Health; and
 - Risk of Major Accidents and Disasters.

6.4 Features Scoped out of Assessment

- 6.4.1 The following section describes the topic for which a detailed assessment is scoped out of the EIA Report for the Proposed Varied Development, Socio Economic and Tourism.

Socio Economic and Tourism

- 6.4.2 The economic effects of the Consented Development were assessed in the 2015 ES and 2016 FEI Report using a specially developed model that has been used to assess the economic impact of wind farms across the UK and was used in the 2012 report on the impacts of on-shore wind commissioned by Renewable UK and the Department for Energy and Climate Change (BiGGAR

Economics, 2012). Tourism impacts were assessed using an established methodology that has been used in Environmental Statements (ES) for more than 30 wind farms across the UK and with reference to research on the effect of wind farms on tourism undertaken on behalf of the Scottish Government.

- 6.4.3 The assessment considered the potential effects on the economy and tourism sector at a local, regional and national level.
- 6.4.4 Although none of the effects identified were assessed as significant, they would nevertheless likely have a notable positive effect on the local economy and the communities in the immediate vicinity of the site, principally during the construction phase of the project, but also over the longer term during operation.
- 6.4.5 Experience from the construction and operation of the existing Gordonbush Wind Farm shows² that the Applicant has a strong commitment to maximising the local and regional economic impact of its activities and to enhancing the benefits that this brings to the communities it operates in. It was anticipated that, if successful, the Applicant would build on this experience to help maximise the benefits of the Consented Development for the local communities in which it would be located.
- 6.4.6 The conclusion of the assessment was that the Consented Development was not expected to have any significant tourism or socio-economic effects. As such it was unnecessary to consider mitigation and no residual effects were identified. The assessment did however conclude that the Consented Development could help to generate a moderate, positive, long-term, cumulative economic effect as a result of its contribution to the wind farm supply chain in the local area.
- 6.4.7 It is not anticipated that the Proposed Varied Development would result in any likely significant effect not already reported upon in the assessment findings of the Consented Development. Therefore, a detailed assessment of socio-economics and tourism has been scoped out from the EIA Report.

² SSE Renewables (Undated) Delivering Social and Economic Benefits: Gordonbush Wind Farm Case Study