

ACHANY EXTENSION WIND FARM

Gate Check Report



sse
Renewables

For a better
world of energy

REPORT VERSIONS

Version	Author	Reviewer	Approver	Date
Rev 01	Rebecca Rae	Andrew Curds	Andrew Curds	09/04/2021

Prepared by:

ASH Design+Assessment Ltd
21 Gordon St,
Glasgow
G1 3PL

Prepared for:

SSE Generation Ltd
1 Waterloo Street
Glasgow
G2 6AY

Gate Check Report

1. Introduction and Background..... 1

2. The Proposed Development..... 3

3. Consultation 5

4. Submission Information 30

5. Conclusion 32

Figures

Figure 1: Site Location

Figure 2: Site Layout

Figure 3: Site Context

Appendices

Appendix 1: 2019 Scoping Matrix

Appendix 2: 2020 Scoping Matrix

1. Introduction and Background

1.1 Introduction

- 1.1.1 This Gate Check Report has been prepared by ASH design + assessment Limited (ASH) on behalf of SSE Generation Ltd (SSEG), hereafter referred to as ‘the Applicant’. This report is submitted to the Energy Consents Unit (ECU) of the Scottish Government in advance of an application to the Scottish Ministers under Section 36 of The Electricity Act 1989 for consent to construct an extension to Achany Wind Farm.
- 1.1.2 The proposals for which consent under Section 36 of the Electricity Act 1989 will be sought by the Applicant are referred to in this report as ‘the Proposed Development’ and are described below. The application for Section 36 consent is being prepared by SSE Renewables Development (UK) Limited (SSE Renewables), “the Developer”, on behalf of the Applicant. Deemed planning permission under Section 57(2) of the Town and Country Planning Act 1997, as amended, will also be sought. The Applicant holds the necessary generation licence required to operate the Proposed Development.
- 1.1.3 The Proposed Development comprises up to 20 wind turbine generators (WTG’s) with a maximum tip height of up to 149.9 metres (m). The Proposed Development forms an extension to Achany Wind Farm. The installed generation capacity of the existing operational Achany Wind Farm is 38 megawatts (MW) and the total installed capacity of the Proposed Development alone, whilst dependent on the rated power of the turbine model procured, is anticipated to be in excess of 80 MW. Therefore, the combined capacity of Achany Wind Farm and the Proposed Development is anticipated to be in excess of 118MW. The Proposed Development is located in the adjoining land to the west of the operational Achany Wind Farm, approximately 4.5km directly north of the village of Rosehall and 10.7km north-west of Lairg.
- 1.1.4 The location of the Proposed Development is shown on Figure 1: Site Location.

1.2 Background

- 1.2.1 An application to construct and operate a 26 turbine wind farm and associated works on Glencassley Estate was previously submitted to the ECU of the Scottish Government in 2012 under the name ‘Glencassley Wind Farm’. The Highland Council (THC) North Planning Applications Committee recommended to raise no objection to this application in 2013, however, it was refused by Scottish Ministers in 2015, in respect of impacts on the Assynt Coigach National Scenic Area (NSA) and on the Reay-Cassley Wild Land Area (WLA).
- 1.2.2 As the site offers excellent potential for a wind farm development due to its wind resource and proximity to existing wind development and in context, coupled with the Climate Emergency, legislated climate change targets and government objectives, the Applicant has revisited the potential opportunity to locate WTGs in the area of the previous application boundary.
- 1.2.3 In doing so, the Applicant has sought to review and address the grounds for refusal of the 2012 Glencassley Wind Farm design, taking previous concerns raised about the prominence and proximity of turbines in views from the nearby Assynt Coigach NSA and to core areas of wild land, into consideration. Initial site optimisation design focused on moving the WTGs of the Proposed Development further from the NSA at the north

western end, closer to the operational Achany and Rosehall Wind Farms, located at the south eastern end of the site, to deliver sustainable renewable energy.

- 1.2.4 As a result, the proposed WTGs are located approximately 2km closer to the operational Achany Wind Farm in comparison to the 2012 Glencassley Wind Farm. Moving the proposed wind turbines closer to the existing Achany turbines brings operational benefits in managing and maintaining both sites. Furthermore, the Proposed Development through its use of existing Achany Wind Farm access tracks, passing places, borrow pit reuse and operational building and storage infrastructure, minimises additional site requirements. Therefore, the project has evolved through the iterative design process to form an extension to the existing operational Achany Wind Farm¹.

1.3 EIA Report and Scoping

- 1.3.1 The application for consent will be supported by an Environmental Impact Assessment (EIA) Report. A Scoping Report for the Proposed Development setting out the proposed scope of the EIA Report was submitted to the ECU on 15 August 2019. A Scoping Opinion was subsequently issued by the ECU on behalf of Scottish Ministers on 22 October 2019.
- 1.3.2 The Scoping Opinion is deemed to be valid for 12-months, beyond which point it is recommended that Scottish Ministers are asked to advise on additional scoping requirements. Submission of the application is anticipated in Summer 2021, beyond the 12-month period. Therefore, as no application for consent for the Proposed Development was made within 12 months of the Scoping Opinion in 2019, a letter requesting a refreshed Scoping Opinion was issued to the ECU on 19 November 2020.
- 1.3.3 On 24 November 2020, the ECU confirmed to the Applicant that they did not intend to provide another formal Scoping Opinion but the Applicant should include any further scoping comments from consultees in the EIA Report. Further detail on the Scoping exercises is provided in Section 3.1 of this Report.

1.4 Purpose of this Report

- 1.4.1 The purpose of this Gate Check Report is to satisfy the requirements of the gate checking procedures for Applications under Section 36 of The Electricity Act 1989, namely to outline consultations with statutory and non-statutory consultees, engagement with the local community and how matters raised during the scoping process have been dealt with in the EIA Report. This report also outlines the key considerations that have been taken into account during the design evolution of the Proposed Development.

¹The project was previously referred to as Glencassley Wind Farm. However, during the iterative design process it was determined to rename the project as Achany Extension Wind Farm due to its close relationship with Achany Wind Farm.

2. The Proposed Development

2.1 Main Components

- 2.1.1 The Proposed Development would consist of up to 20 WTGs with a tip height of 149.9m. The layout of the Proposed Development, shown on Figure 2: Site Layout, has been subject to an iterative and detailed engineering and operational design process.
- 2.1.2 The Proposed Development would comprise the following key components:
- 20no. wind turbines of 149.9m tip height with internal transformers;
 - Crane hardstanding and associated laydown area at each wind turbine location;
 - On site access tracks (of which approximately 17.3km are new access tracks and approximately 6.6km are existing tracks where upgrades may be required to facilitate delivery of the wind turbine components);
 - A new on-site substation, welfare building and store;
 - Extension to the existing operations building at Achany Wind Farm to accommodate additional staff;
 - A network of underground cabling to connect each wind turbine to the on-site substation;
 - A LiDAR unit to collect meteorological and wind speed data, and associated hard stand; and
 - Any associated ancillary works required.
- 2.1.3 In addition to the permanent components, the construction phase would comprise the following temporary facilities:
- Site compound areas, including welfare facilities, site cabins, and parking;
 - Batching plant facilities for temporary concrete batching plants;
 - Temporary telecommunications infrastructure; and
 - Borrow pits, comprising both new and reworking of an existing borrow pit used for Achany Wind Farm.
- 2.1.4 The Proposed Development would utilise existing access tracks constructed for the Achany Wind Farm to access the site, including the site entrance off the A839.

2.2 Design Evolution

- 2.2.1 As noted in Section 1.2, an application for consent to construct and operate a 26 turbine wind farm and associated works on Glencassley Estate was previously refused by Scottish Ministers in 2015, in respect of impacts on the Assynt Coigach NSA and on the Reay-Cassley WLA, as shown in Figure 3: Site Context.
- 2.2.2 Following the decision by the Applicant to review and optimise the design, the starting point for the design evolution process was to take account of the previous concerns and points of objection, whilst also considering the opportunities presented by extending the existing wind farm at Achany.
- 2.2.3 Initial site optimisation and early design work focused on moving the site further from the Assynt Coigach NSA towards the southern margins of the Reay-Cassley WLA, with the aim of reducing the potential for significant landscape and visual effects as far as possible and to ensure that the integrity of both the NSA and the WLAs are preserved.

-
- 2.2.4 The Reay – Cassley WLA extends 560km² across north-west Sutherland covering the mountain massif area of Ben More Assynt, remote areas around Lochs Glendhu and Glencoul, and elevated plateau areas to the east and west of Glen Cassley. An exercise was undertaken to identify a potential optimal layout within the confines of the site with the aim of reducing potential effects on the WLA and NSA. This considered the NatureScot Description and Key Qualities of the WLA and review of the NatureScot Map of Relative Wildness with a Jenks 8 Classification, as defined in the methodology for the identification of the WLAs undertaken by NatureScot. The conclusion of this exercise was to confine proposed turbine locations to the south of Beinn na Sgeireach. It is acknowledged that the Proposed Development would therefore be located just within the southern boundary edge of the Reay-Cassley WLA. However, by locating turbines within this area, it is considered that the theoretical visibility of the Proposed Development would be largely limited to areas where there are already existing external influences on the WLA, including existing wind turbines at Achany, Rosehall and Lairg, and existing features within Glen Cassley, including those associated with the Duchally and Cassley hydroelectric scheme.
- 2.2.5 Following the initial design evolution exercise, the layout became more clearly defined through a rigorous and iterative process by the EIA and technical teams, taking cognisance of the constraints and opportunities present at the site. A number of design workshops were held, and particular attention paid to minimising impacts on sensitive habitats and avoiding deeper areas of peat, ornithological sensitivities, and minimising landscape and visual effects as much as possible. Peat depth and vegetation surveys, including a National Vegetation Survey (NVC), Peatland Condition Assessment and Phase 1 and Phase 2 peat probing, have been undertaken to inform this process.
- 2.2.6 Furthermore, in seeking to evaluate and address the recommendations set out in the 2019 Scoping Opinion in respect of turbine lighting and landscape and visual considerations, the height of turbines is now proposed at 149.9m, ensuring that a visible lighting scheme is not a mandatory requirement under the Civil Aviation Authority (CAA) requirements.
- 2.2.7 Further information on the design evolution process will be provided within the Site Selection and Design Evolution chapter in the EIA Report, in addition to a Design Statement that will form an appendix to the EIA Report.

3. Consultation

3.1 Scoping

2019 Scoping Exercise

- 3.1.1 As noted in paragraph 1.3.1, a Scoping Report was issued to the ECU on 15 August 2019 to seek a Scoping Opinion from the Scottish Ministers on the environmental information to be provided in the EIA Report.
- 3.1.2 A Scoping Opinion (hereafter referred to as 'the 2019 Scoping Opinion') was subsequently provided by the ECU on 22 October 2019.
- 3.1.3 The responses contained within the 2019 Scoping Opinion were considered in detail during the EIA process. A matrix detailing the key issues that were raised in the 2019 Scoping Opinion and how and where they will be addressed in the EIA Report is included in Appendix 1. A summary is provided in Tables 3.1 to 3.6 below.

2020 Scoping Exercise

- 3.1.4 As noted in paragraph 1.3.2, the 2019 Scoping Opinion states that advice regarding the requirement for an additional Scoping Opinion be sought from Scottish Ministers if an application for consent has not been made within 12 months of the relevant Scoping Opinion. As no application for consent for the Proposed Development was made within 12 months of the 2019 Scoping Opinion, a letter requesting a refreshed scoping opinion (hereafter referred to as 'the 2020 Scoping Refresh letter') was issued to Scottish Ministers on 19 November 2020. The 2020 Scoping Refresh Letter provided Scottish Ministers with an update on the Proposed Development, including the revised site design, turbine height, project name and submission date and to provide clarification, where required, in relation to matters raised in the 2019 Scoping Opinion.
- 3.1.5 On 24 November 2020, the ECU confirmed to the Applicant (via email) that the 2020 Scoping Refresh letter had been issued to all consultees that had been previously consulted during the 2019 Scoping process. All consultees were requested to provide a response by 16 December 2020. The ECU also confirmed that they did not intend to provide another formal scoping opinion in relation to the 2020 Scoping Refresh Letter, but the Applicant should include any further scoping comments from consultees in the EIA Report.
- 3.1.6 A matrix detailing the key issues that were raised by consultees following the submission of the 2020 Scoping Refresh letter and how and where they will be addressed in the EIA Report is provided in Appendix 2. A summary is provided in Tables 3.1 to 3.6 below.

3.2 Key Scoping Issues

- 3.2.1 The following section provides a summary of the key comments received from statutory consultees during the scoping process. Where a specific point is repeated in both the 2019 and 2020 scoping responses, this is referred to in the most recent response in the tables below to avoid duplication.

Energy Consents Unit

- 3.2.2 Key comments received from ECU in the 2019 Scoping Opinion are presented in Table 3.1. No additional comments were received from ECU following the submission of the 2020 Scoping Refresh Letter.

Table 3.1: ECU Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
Borrow Pits	The EIA Report should include search areas of the proposed locations for on-site borrow pits and present details on the borrow pit design including indicative plans.	A Borrow Pit Report will be included in the EIA Report as a Technical Appendix.
Drinking Water Protected Areas	The Applicant should contact Scottish Water to make further enquiries about whether there are any drinking water protected areas (DWPA) or Scottish Water assets which the Proposed Development could affect.	No DWPAs or Scottish Water assets that could be affected by the Proposed Development have been identified, as confirmed by Scottish Water in their Scoping Response. A Hydrology and Hydrogeology Chapter will be included in the EIA Report.
Private Water Supplies	Details of Private water supplies (PWS) within close proximity of the Proposed Development should be included in the EIA Report, along with an assessment of the potential impact, risks and mitigation.	This will be included in the Hydrology and Hydrogeology Chapter of the EIA Report.
Fisheries	Advice provided by Marine Scotland Science (MSS) and Kyle of Sutherland District Fishery Board (KSF) in relation to guidelines on survey and monitoring programme should be taken on board.	Scoping responses from MSS and KSF have been taken into account. Further details of fish survey and appropriate mitigation will be detailed in the Ecology Chapter of the EIA Report.
Peat	Peat depth and vegetation surveys along with a Peat Management Plan (PMP) will be required to be part of the EIA Report, along with a Peat Landslide and Hazard Risk Assessment (PLHRA).	Peat depth and vegetation surveys, including peatland condition assessment surveys, have been carried out. The results of these surveys will be detailed in the Ecology and Geology and Carbon Balance Chapters of the EIA Report. A PLHRA will also be included in the EIA Report as a Technical Appendix.
Wild Land	Scope and methodology of wild land assessments should be decided in discussion with SNH (now NatureScot (NS)).	The Wild Land Assessment will be completed in accordance with NS's Wild Land Assessment Guidance: 'Assessing Impacts on Wild Land Areas – Technical Guidance' (NatureScot, 2020). Confirmation of the approach has been discussed with NS.
LVIA Viewpoints	Viewpoints should be agreed with THC, SNH (now NS), HES and MS and presented in the EIA Report.	Viewpoint locations have been determined following review of advice provided through the Scoping process, and through further consultation with THC and NS. A final viewpoint list was agreed through consultation with THC and NS.

Topic	Scoping Comment	Response to Consultee
Cultural Heritage	The EIA Report should consider the impacts on the scheduled monument Dail Langwell, broch and other heritage assets.	Potential impacts on cultural heritage assets, including the scheduled monument Dail Langwell, broch, will be considered in the Cultural Heritage Chapter of the EIA Report.
Management Plans	The Company should take on board THC's comments regarding Habitat Management Plan (HMP), Deer Management Plans (DMP) and Biodiversity Action Plan.	An Outline HMP and DMP will be provided as Technical Appendices to the EIA Report. The Outline HMP will aim to restore and enhance blanket bog.
Ornithology	The Company should take note of RSPB Scotland's advice in respect to 'scoped in effects' to be assessed. The Company should discuss bird survey methodology with SNH (now NS) and RSPB Scotland.	Advice from RSPB Scotland and NS has been noted in developing the scope of ornithology surveys. Further consultation is being undertaken with RSPB, and details will be provided in the ornithology chapter of the EIA Report.
Discussion	Scottish Ministers would like to be kept informed of relevant discussions.	The ECU have been kept informed throughout the EIA stages through telephone, email and virtual meetings.
Schedule of Mitigation	Mitigation measures proposed for any significant environmental impact identified should be presented as a conclusion to each chapter. A consolidated schedule, in tabular form, of all mitigation measures proposed, should be included in the EIA Report.	Mitigation measures will be identified within each Technical Chapter. A Schedule of Mitigation Measures, in tabular form, will be included in the EIA Report.
Scoping Matix	The EIA Report should include a summary, in tabular form, of where within the EIA Report each of the specific matters raised in the scoping opinion have been addressed.	This will be included in the relevant chapters of the EIA Report, as well as a Scoping Matrix (to be included as a Technical Appendix).
Topic	Scoping Comment	Response to Consultee
2020 Scoping Refresh		
The ECU did not provide an updated scoping response following the submission of the 2020 Scoping Refresh Letter.		

The Highland Council

3.2.3 Key comments received from THC in the 2019 and 2020 scoping exercising are presented in Table 3.2.

Table 3.2: The Highland Council Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
LVIA Viewpoints	Viewpoints should correspond with the viewpoints used for existing wind energy schemes in the area and those currently under consideration.	This has been considered. The final list of VPs has been agreed with THC and NS.
Noise	An operational noise assessment should be carried out in accordance with ETSI-R-97 “The Assessment and Rating of Noise from Wind Farms” and the associated Good Practice Guide published by the Institute of Acoustics.	The assessment of noise has been carried out in accordance with the stated guidance and will be described in the Noise Chapter of the EIA Report.
2020 Scoping Opinion		
Description of Development	<p>The description of the Proposed Development set out in the EIA Report must include:</p> <ul style="list-style-type: none"> • a description of the physical characteristics of the whole development and the full land-use requirements during all phases; • a description of the main characteristics of the production processes; • the risk of accidents; • an estimate, by type and quantity, of expected residues and emissions resulting from the operation of the development; and • the estimated cumulative impact of the project with other consented or operational developments. 	The Description of Development Chapter in the EIA Report will detail the specific elements of the Proposed Development. The assessment of the Proposed Development will be undertaken throughout the EIA Report
Alternatives	The EIA Report should outline the main development alternatives studied and an indication of the main reasons for the final project choice.	The Site Selection and Design Evolution Chapter of the EIA Report will detail the alternatives studied by the Applicant.
Assessment	The EIA Report must provide a description of the aspects of the	The assessment of the Proposed Development is undertaken throughout the EIA Report.

Topic	Scoping Comment	Response to Consultee
	environment likely to be significantly affected.	
Land Use and Policy	The EIA Report should recognise the existing land uses affected by the Proposed Development having regard for THC's Development Plan and supplementary guidance. Scottish Government policy and guidance on renewable energy and wind energy should be considered in this section.	These policy documents will be referenced within the Planning Policy and Context Chapter of the EIA Report and the Planning Statement, which will accompany the EIA Report
	The Applicant should consider the implications of the National Planning Framework 4 (NPF4) Position Statement and other relevant national policy.	The implications of NPF4 will be considered within the Planning Policy Chapter and the Planning Statement which accompanies the EIA Report.
Landscape and Visual	THC expects the EIA Report to consider the landscape and visual impact of the Proposed Development.	Landscape and visual impacts will be considered in the Landscape and Visual Chapter of the EIA Report.
	THC require single frame images with different focal lengths taken with a 35mm format full frame sensor camera. The focal lengths required are 50mm and 75mm. These images should form part of the EIA Report. Photomontages should follow the Council's Visualisation Standards.	Visualisations produced to the THC 'Visualisation Standards for Wind Energy Development' (2016) will be included in a separate volume of the EIA Report.
	Separate volumes of visualisations should be prepared to both THC Standards and NS guidance. These should be provided in hard copy.	This will be undertaken.
	All existing turbines should be re-rendered in visualisations even if they appear to be facing the viewer in the photograph to ensure consistency.	This will be undertaken and detailed in the EIA Report.
	The LVIA should include the expected impact of on-site borrow pits and access roads.	This will be considered in the Landscape and Visual Chapter of the EIA Report.
	The cumulative assessment study area should be the same as the visual assessment.	Agreement on cumulative assessment study areas has occurred in consultation with THC and will be set out in the Landscape and Visual Chapter of the EIA Report.

Topic	Scoping Comment	Response to Consultee
	A list of proposed developments to be included in the cumulative assessment should be agreed with THC and NS at the earliest possible opportunity.	The final list of cumulative sites to be included in the assessment has been agreed with THC and NS.
	The final list of viewpoints for the production of visualisations should be agreed with the Planning Authority.	The final list of VPs has been agreed with THC and NS.
	Given the scale of the turbines, THC would encourage an increase to the study area to a minimum 45km study area and expect that a detailed assessment of effects should be undertaken for the whole study area.	Turbines are proposed up to 149.9m. The Study Area for the landscape and visual assessment is proposed to be 40km in line with current best practice guidance (Visual Representation of Wind Farms, v2.2 (SNH / NS, 2017). A detailed study area of 20km is proposed for assessment of residential areas and landscape character types.
	The assessment of impact on recreational routes should include all core paths, the national cycle network, long distance trails and the North Coast 500.	An assessment of the potential impact on recreational routes will be undertaken and detailed in the Landscape and Visual Chapter of the EIA Report.
	The NS 2019 landscape character assessment should be used.	The NS 2019 Landscape Character Assessment will be referred to in the Landscape and Visual Chapter of the EIA Report.
	An assessment on WLAs should be included within the EIA Report given the proximity to a number of WLAs and theoretical visibility within these areas.	An assessment on Wild Land Areas 34 and 37 has been undertaken in agreement with NS and will be provided in the Landscape and Visual Chapter of the EIA Report and associated Technical Appendices.
	The EIA Report should include an assessment of the proposal against the criterion set out in THC's Onshore Wind Energy Supplementary Guidance to be included in the LVIA.	An assessment of the Proposed Development against relevant OWESG criterion will be provided in the EIA Report.
	The landscape assessment should assess the impacts on any landscapes designated at a national and local scale, including the impact on Special Landscape Areas (SLA).	Potential impacts on Landscape designations will be assessed in the Landscape and Visual Chapter of the EIA Report.
Aviation Lighting	Aviation lighting is not considered a mandatory requirement due to the proposed scale and location of the turbines. The effect of the	The selection of a turbine with tip height below 150m removes the

Topic	Scoping Comment	Response to Consultee
	aviation lighting should be assessed through the EIA process if any aviation based consultees require it.	requirement for visible aviation lighting.
Residential Visual Amenity	We are content that residential visual amenity is assessed within the LVIA chapter of the EIA Report.	Noted. Residential visual amenity will be assessed in the Landscape and Visual Chapter of the EIA Report.
Ecology	The EIA Report should provide a baseline survey of the bird, animals and habitats present on the site. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog.	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices, including an Outline HMP.
	The EIA Report should provide a baseline survey of plants (and fungi) and trees present on the site.	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report.
	The EIA Report should address the likely impacts on the nature conservation interests of all designated sites in the vicinity of the site and provide proposals for any mitigation to reduce any impacts to not significant.	This has been undertaken and will be detailed in the Ecology and Ornithology Chapters of the EIA Report.
	If wild deer use the site, an assessment of the potential impact on deer will be required.	This will be included in the Ecology Chapter of the EIA Report. A DMP will also be prepared and will be included as a Technical Appendix.
	The EIA Report should address the aquatic interests that may be impacted by the Proposed Development.	Potential effects on aquatic interests will be addressed in the Ecology Chapter of the EIA Report.
	The EIA Report should include an assessment on Ground Water Dependent Terrestrial Ecosystems (GWDTE).	Impacts on GWDTEs will be assessed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report.
Ornithology	An assessment of the impacts to birds through collision, disturbance and displacement will be required for both the development site and cumulatively with other proposals. The EIA Report should clearly set out the survey methods.	An assessment of the potential impact of the Proposed Development on birds will be provided in the Ornithology Chapter of the EIA Report.
Noise	The noise assessment must take into account the potential cumulative effect from any other	The Noise Chapter of the EIA Report will include the required details.

Topic	Scoping Comment	Response to Consultee
	existing or consented, or proposed wind developments.	
	<p>The assessment should include a table of figures which includes:</p> <ul style="list-style-type: none"> • The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12 m/s; • The maximum levels based on consented limits for each existing or consented scheme at each NSL; • The predicted levels from each existing or consented wind farm development at each NSL; and • The cumulative levels based on consented and predicted levels at each NSL. 	The Noise Chapter of the EIA Report will include the required details.
	Background Noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. Monitoring locations should be agreed with the Councils Environmental Health Officer (EHO).	The Noise Chapter of the EIA Report will include the required details. Monitoring locations have been agreed with the THC EHO.
	Where there is potential for disturbance from construction noise, the application will need to include a noise assessment in accordance with BS 5228-1:2009 ² . Details of mitigation measures should be provided.	The Noise Chapter of the EIA Report will include the required details.
Cultural Heritage	All designated sites which may be affected by the Proposed Development either directly or indirectly should be identified.	Potential for direct and indirect effects on cultural heritage assets will be addressed in the Cultural Heritage Chapter of the EIA Report.
	An assessment should contain full appreciation of the setting of historic environment assets and the likely impact on their settings. If the assessment finds that significant impacts are likely, appropriate visualisations should be provided.	The setting of historic assets will be assessed in the Cultural Heritage Chapter of the EIA Report. A visualisation from Dail Langwell, Broch Scheduled Monument will also be provided.
	There are a large number of heritage assets in the vicinity of	Potential for direct and indirect effects on cultural heritage assets

² "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise".

Topic	Scoping Comment	Response to Consultee
	the Proposed Development; these need to be assessed.	will be addressed in the Cultural Heritage Chapter of the EIA Report.
Hydrology and Hydrogeology	The EIA Report should address the nature of the hydrology and hydrogeology of the site and potential impacts on watercourses, water supplies (including PWS), water quality, water quantity and on aquatic flora and fauna. Measures to prevent affects will be required along with monitoring proposals and contingency plans.	This will be addressed in the Hydrology and Hydrogeology Chapter of the EIA Report and accompanying appendices.
	The EIA Report should identify all water crossings and include a systematic table of watercourse crossings or channelising with detailed justification for the need and design to minimise impact. The table should be accompanied by photography.	Details on watercourse crossing, including photography, will be provided in Watercourse Crossings Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report
	Any PWS which may be affected by the Proposed Development should be investigated. Measures proposed should be provided. On-site survey will be required.	An assessment of the Proposed Development on PWS has been undertaken and will be detailed in the Hydrology and Hydrogeology
Peat	The EIA Report should consider the risks of engineering instability relating to the presence to peat on the site.	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report
	A PLHRA should be carried out in accordance with Best Practice Guide. This should include a detailed map of peat depth and evidence that the scheme minimises impact on deep peat.	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report
	The EIA Report should include a full assessment on the impact of the Proposed Development on peat. This must include peat probing for all areas where Proposed Development is proposed, including areas subject to micro-siting limits.	Peat depth probing has been carried out across the site to inform the layout and assessment of effects. This will be detailed in the Geology and Carbon Balance Chapter of the EIA Report and associated Technical Appendices.
Geology and Carbon Balance	Carbon balance calculations should be undertaken and included in the EIA Report with a summary of the results focussing on the carbon payback period for the wind farm.	A carbon balance calculation will be undertaken and will be reported in a Technical Appendix associated with the Geology and Carbon Balance Chapter of the EIA Report
	The EIA Report should describe the significant effects of the	Potential effects on geology will be provided in the Geology and Carbon

Topic	Scoping Comment	Response to Consultee
	Proposed Development on local geology.	Balance Chapter of the EIA Report. A Borrow Pit Report will also be included in the EIA Report as a Technical Appendix.
Traffic and Transport	A Transport Assessment or section on traffic and transportation will be required in the EIA Report.	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix).
	The chosen Port of Entry and preferred route for the AIL shall be clearly demonstrated and include details of alternative routes considered. The proposed route for general construction traffic should also be identified.	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment and a Route Survey Report (presented as Technical Appendices) which will include the required details.
	<p>Matters to be covered in the transport assessment include:</p> <ul style="list-style-type: none"> Identify all public roads affected by the Proposed Development and routes used by suppliers; Establish current condition of the roads; Traffic resulting from the Proposed Development; Current traffic flows; Impacts of proposed traffic on roads, users, communities and a swept path analysis; Cumulative impacts with other developments; and Proposed mitigation measures to address impacts. 	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include the required details.
	The EIA Report should consider implications on the Trunk Road network.	The Traffic and Transport Chapter of the EIA Report will consider implications on the Trunk Road network.
Socioeconomics , Recreations and Tourism	Socio-economic, recreation and tourism should have its own chapter in the EIA Report.	A Socio-economic, Recreation and Tourism Chapter will be included in the EIA Report.
	<p>A plan detailing the following should be submitted as part of the EIA Report:</p> <ul style="list-style-type: none"> Existing public non-motorised public access footpaths, bridleways, cycleways; Proposed public access provision both during construction and after completion of the Proposed Development; and 	A Draft Outdoor Access Management Plan, which will include the required details, will be prepared and provided as a Technical Appendix to the EIA Report.

Topic	Scoping Comment	Response to Consultee
	<ul style="list-style-type: none"> Impacts of the Proposed Development on the core paths and proposed mitigation. 	
	The application should be accompanied by an Access Management Plan.	A Draft Outdoor Access Management Plan will be prepared and provided as a Technical Appendix to the EIA Report.
Tele-communication s and Radar	The EIA Report should consider impacts on existing infrastructure; TV radio, telecommunication links, aviation, radar, MOD safeguards.	Potential impacts on existing infrastructure; TV radio, telecommunication links, aviation, radar, MOD safeguards will be considered in the EIA Report.
	There should be continued dialogue with HIAL over the impact on radar at airports in the area.	Consultation responses from HIAL and potential effects on aviation will be provided in the Aviation Chapter of the EIA Report.
Shadow Flicker	If there are no properties within 11 rotor diameters, shadow flicker will not require detailed assessment but should still be addressed in the EIA Report.	Noted. Shadow flicker will be scoped out of the EIA Report.
Forestry	The EIA Report should indicate all areas of woodland / trees that will be felled to accommodate the Proposed Development. Compensatory planting is an expectation for any felling.	No felling is proposed.
Air Quality	Existing air quality and general qualities of the local environment including background noise, sunlight and prevailing wind should be considered in the EIA Report.	Local environmental factors will be considered throughout the EIA Report.
Dust	The Applicant may be required to submit a scheme for the suppression of dust during construction.	This information will be provided in Draft Construction Environmental Management Plan (CEMP), which will be included in the EIA Report as a Technical Appendix.
Climate	The EIA Report needs to address all relevant climatic factors.	This will be considered in the EIA Report.
CEMD	An outline CEMD should be included with the application.	This information will be provided in Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
Mitigation	A description of the measures envisaged to prevent, reduce and where possible offset significant adverse impacts on the	Mitigation measures will be identified within each Technical Chapter. A Schedule of Mitigation

Topic	Scoping Comment	Response to Consultee
	environment must be set out in the EIA Report. A clear summary table of all mitigation measures associated with the Proposed Development should be provided and entitled draft 'Schedule of Mitigation'.	Measures will be included in the EIA Report.

Historic Environment Scotland

- 3.2.4 Comments received from Historic Environment Scotland (HES) in the 2019 and 2020 Scoping exercises are presented in Table 3.3.

Table 3.3: Historic Environment Scotland Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
Cultural Heritage	There are some heritage assets within the surrounding area including one scheduled monument: Dail Langwell broch. An assessment of the potential impacts on the setting of this scheduled monument should be included in the EIA Report, including visualisations.	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage Chapter of the EIA Report. A visualisation from Dail Langwell Broch will also be provided.
	Where significant impacts are identified they should be reduced or avoided by amendments to the design.	Potential impacts on Cultural Heritage assets were considered during the design process. Potential impacts on cultural heritage assets will be considered in the Cultural Heritage Chapter of the EIA Report.
2020 Scoping Opinion		
Cultural Heritage	The Scoping Refresh document identifies that there are no anticipated changes in scope for the cultural heritage chapter from the 2019 scoping opinion and the previous HES advice therefore still stands.	Noted. Refer to HES advice provided in the 2019 Scoping Opinion (See Above).

Marine Scotland Science

- 3.2.5 Key comments received from Marine Scotland Science (MSS) in the 2019 Scoping Opinion are presented in Table 3.4. No additional comments were received from MSS following the submission of the 2020 Scoping Refresh Letter.

Table 3.4: Marine Scotland Science Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
Connectivity to Designated Sites	The Proposed Development is drained by watercourses within the River Cassley which forms part of the River Oykel Special Area of Conservation (SAC); salmon is a qualifying feature for this designation status. Both salmon and trout are listed as priority species for conservation in the Scottish Biodiversity List and should be considered.	Potential impacts on designated sites and species listed in the Scottish Biodiversity List will be addressed in the Ecology Chapter of the EIA Report. A Habitats Regulation Assessment (HRA) will also be undertaken and included in the EIA Report as a Technical Appendix.
EIA Scope	MSS advise that the Applicant carries out the following in the EIA: <ul style="list-style-type: none"> • Consult the MSS generic scoping guidelines; • Site characterisation surveys of the water quality and fish populations in line with MSS guidelines on survey and monitoring programmes; and • Consider the potential cumulative impacts on water quality and fish populations. 	Fish surveys have been carried out, and the results and appropriate mitigation measures will be detailed in Ecology Chapter of the EIA Report. Baseline water quality monitoring would be carried out pre-construction and subsequent monitoring during construction and operation in line with the CEMP to be adopted by the Applicant's appointed Principal Contractor. A Draft CEMP, will be included in the EIA Report as a Technical Appendix.

NatureScot

3.2.6 Key comments received from NatureScot (NS) in the 2019 and 2020 scoping exercises are presented in Table 3.5.

Table 3.5: NatureScot Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
Pre-application Advice	NS would want to meet The Applicant to explore alternatives or discuss other solutions to reduce adverse impacts. NS will also be looking to see how The Applicant addresses the impacts which NS previously identified and any new impacts, including potential effects on the wild qualities identified for Reay-Cassley WLA, the degree to which turbine lighting is to be required and the potential cumulative effects on these WLAs.	Contact with NS has been maintained throughout the EIA process. A Wild Land Assessment, including an assessment of potential cumulative effects, will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). There is no requirement for assessment of visible turbine lighting as the turbine height has been fixed at 149.9 m, which removes the requirement for visible aviation lighting.
Designated Sites	There is a high risk that the Proposed Development could impact on a range of upland birds connected to the Caithness and Sutherland Peatlands Special Protected Area (SPA). Displacement, disturbance and collision risk should be assessed for all stages of the Proposed Development.	Potential impacts on the specified designated site and its qualifying features will be addressed in the Ornithology chapter of the EIA Report. Displacement, disturbance and collision risk impacts on bird species will be assessed for all stages of the Proposed Development (where relevant).
Ornithology	NS note that part of the Proposed Development is not visible, as indicated in the vantage point (VP) and viewshed map (in proximity to VPs 3 and 5). Clarification of the turbine layout would help to determine whether bird survey coverage is going to be considered sufficient.	NS guidance has been taken into account in the selection of vantage points and vantage point locations have been determined by a combination of factors, most notably topography. Justification of their selection will be provided in the Ornithology Chapter.
	For diver surveys, VP work should be undertaken at a time of day which will maximise flight data. If divers are found to be breeding on lochs surrounding the Proposed Development then focal diver observations may be required. Assessments should be carried out in context to the Conservation Objectives of the SPA.	Potential impacts on divers and the qualifying features of the SPA will be addressed in the Ornithology Chapter and associated Technical Appendices.
	Cumulative assessment should be carried out in accordance with 'Assessing the Cumulative Impacts of	Cumulative assessment on birds will be undertaken in accordance with

Topic	Scoping Comment	Response to Consultee
	Onshore Wind Farms on Birds' (SNH, August 2018).	this guidance and reported in the Ornithology Chapter.
Grudie Peatlands SSSI	The proposal abuts Grudie Peatlands Site of Special Scientific Interest (SSSI), which is protected for its bog habitat and breeding populations of upland birds. Impacts on all these features should be assessed within the EIA Report.	Potential impacts on Grudie Peatlands SSSI will be considered in the Ecology Chapter of the EIA Report.
Peat and Carbon Rich Soils	As carbon rich / peat soils and peatland habitats extend over large areas of the site, the Applicant needs to demonstrate that a wind farm can be built on this site, without significant loss and damage to these nationally important interests.	The Proposed Development has evolved through an iterative design process to inform the layout and minimise placement of infrastructure on sensitive habitat and deeper areas of peat. This process has been informed through habitat, peatland condition and peat depth surveys and will be documented in the EIA Report.
Habitat Management Plan	NS would welcome the inclusion of an outline HMP within the EIA Report.	An Outline HMP will be provided in the EIA Report as a Technical Appendix.
Otters	NS acknowledge that a full protected species survey will be undertaken. Impacts to otters and their resting places should be assessed in context to the Caithness and Sutherland Peatlands.	Protected species surveys, including otter surveys, have been undertaken, the results of which will be provided in the Ecology Chapter of the EIA Report.
Deer Management	A Deer Assessment should be included in the EIA Report	An assessment of the potential impact on deer will be included in the Ecology Chapter of the EIA Report. A DMP will also be prepared and provided in a Technical Appendix.
2020 Scoping Opinion		
Scoping	NS note that their comments provided within the 2019 Scoping Opinion are still valid but they have provided additional comments and points of clarification since the number and dimensions of turbines have been revised.	Noted. Refer to NS's response in 2019 Scoping Opinion (See above). Additional NS comments and points of clarification will also be addressed within the EIA Report (as summarised in this table).
Wild Land	As the Proposed Development is fully located within the Reay-Cassley WLA, it is highly likely to result in significant adverse effects on the qualities of this WLA and therefore NS may object.	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report and associated Technical Appendices.
	The Applicant should undertake an assessment of effects on WLAs using the new Wild Land Technical	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben

Topic	Scoping Comment	Response to Consultee
	Guidance (Sept 2020). NS agree that the Wild Land Assessment should include both Wild Land Areas: Reay – Cassley WLA and Foinaven – Ben Hee WLA.	Hee) within the Landscape and Visual Chapter of the EIA Report and associated Technical Appendices. The Wild Land Assessment will be completed in accordance with NS's guidance (NatureScot, 2020).
	The VPs that have been selected within the Reay-Cassley WLA are both elevated locations. NS notes that whilst these viewpoints often form the best locations from which to assess visual effects, this is not necessarily the case when considering effects on WLA qualities. NS suggest that the Applicant identifies additional assessment locations where the wild land qualities are well expressed and the influence of other development in the baseline is not so apparent.	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). The final list of VPs has been agreed with THC and NS.
Aviation Lighting	NS welcome the confirmation that aviation lighting will not be required due to the turbines being confirmed at <150m in height.	Noted
Protected Areas	The Proposed Development abuts a component part of the Caithness & Sutherland Peatlands SPA, Ramsar Site and SAC. In addition, this proposal is hydrologically connected to the River Oykel SAC.	Potential impacts on these designated sites and their qualifying features, including through hydrological connectivity, will be addressed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report and their associated Technical Appendices.
	The layout of the Proposed Development shows turbines in very close proximity to the Caithness & Sutherland Peatlands SAC and close to watercourses which eventually flow into the River Oykel SAC. A PLHRA should be undertaken to inform the potential impacts upon all of these Protected Areas, and mitigation identified to reduce risk. Other assessments will also be required (as outlined in NS's 2019 Scoping Response).	Potential impacts on these designated sites and their qualifying features, including through hydrological connectivity, will be addressed in the Ecology Chapter and the Hydrology and Hydrogeology Chapter of the EIA Report. A PLHRA will be included in the EIAR as a Technical Appendix. Other assessments outlined in the 2019 Scoping Opinion, including a Outline HMP and a DMP, will also been included in the EIA Report as Technical Appendices.

Scottish Environment Protection Agency

3.2.7 Key comments received from the Scottish Environment Protection Agency (SEPA) in the 2019 and 2020 scoping exercises are presented in Table 3.6.

Table 3.6: SEPA Scoping Responses

Topic	Scoping Comment	Response to Consultee
2019 Scoping Opinion		
EIA Scope	<p>The following must be submitted in support of the application:</p> <ul style="list-style-type: none"> a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers; b) Map and assessment of impacts on GWDTEs 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; and f) Decommissioning statement. 	<ul style="list-style-type: none"> a) To be included as a Figure(s) associated with the Hydrology and Hydrogeology Chapter of the EIA Report. b) A Technical Appendix detailing GWDTE will be included in the EIA Report. In addition, potential impacts and principles of mitigation will be set out in the Hydrology and Hydrogeology Chapter. c) Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report. A draft Peat Management Plan will also be included as a Technical Appendix to the EIA Report. d) A Borrow Pit Report will be included as a Technical Appendix to the EIA Report. e) A Schedule of Mitigation Measures will be in the EIA Report. f) A Decommissioning Statement will be included in Description of Development Chapter of the EIA Report.
Development Design	SEPA provided early advice in relation to minimising the length of access tracks required, use of existing infrastructure and maintaining appropriate watercourse buffers.	The EIA Report will include detail of how the Proposed Development has been designed to take account of this advice.
Peat and Carbon Rich Soils	SEPA expect the application to be supported by a full site-specific PMP.	Peat probing has been carried out across the site to inform the design iteration process. Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report. A draft PMP will also be included as a Technical Appendix.
Development Design	To avoid doubt, SEPA would not consider an application with large search areas for potential borrow pits to be acceptable. Enough information	A Borrow Pit Report will be included as a Technical Appendix to the EIA Report.

Topic	Scoping Comment	Response to Consultee
	needs to be collected at the application stage to demonstrate that any areas proposed could provide the required material without unacceptable impacts on the environment. A constraints analysis approach may be useful.	
	SEPA note the proposal to include an Outline CEMP with the submission. SEPA now advocate a more streamlined approach to submissions in the form of a Schedule of Mitigation and a series of detailed site specific plans, which show permanent and temporary infrastructure, local sensitivities, and proposed mitigation measures.	In addition to the inclusion of a Draft CEMP, a Schedule of Mitigation Measures and relevant detailed site plans will also be included in the EIA Report.
2020 Scoping Opinion		
Consultation	SEPA strongly encourage the Applicant to engage in further consultation prior to submission.	Further consultation with SEPA has been sought, providing habitat and peat depth data as requested. However, due to the SEPA cyber attack in December 2020, SEPA have been unable to respond to the consultation.
Site Layout	SEPA welcome that the overall area for the Proposed Development is now smaller and with only one access point.	Noted
	SEPA welcome that the Proposed Development intends to make use of existing infrastructure associated with the Achany Wind Farm	Noted
	SEPA consider that the two most northerly borrow pits should be accessed via the proposed permanent track (rather than including new lengths of temporary track) and the track loop further south should be removed from the design. SEPA's preference is for turbines, and the associated infrastructure, to be situated on the main track where feasible.	The design changes proposed by SEPA have been considered in the design evolution of the Proposed Development and will be outlined in the EIA Report.
Survey Work	SEPA note that Phase 1 habitats / NVC surveys and Stage 1 peat probing have been undertaken and that Phase 2 peat probing is underway. SEPA encourage these to be submitted as soon as possible.	Further consultation with SEPA has been sought, providing habitat and peat depth data as requested. However, due to the SEPA cyber attack in December 2020, SEPA have been unable to respond to the consultation.

Topic	Scoping Comment	Response to Consultee
EIA Scope	All maps must be based on an adequate scale with which to assess the information. All maps must detail all proposed upgraded, temporary and permanent site infrastructure.	All figures accompanying the EIA Report will use appropriate map scales allowing for information to be assessed. The noted details will be included on figures, where appropriate.
Development Design	Existing built infrastructure must be re-used or upgraded wherever possible. Cabling must be laid in ground already disturbed, such as verges.	Existing infrastructure would be used as far as practicable. Information on cabling will be provided in the Description of Development Chapter of the EIA Report
Hydrology and Hydrogeology	The site layout must be designed to avoid impacts on the water environment. Where activities such as watercourse crossings cannot be avoided then the submission must include justification of this and a map showing: a) All infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50 m around each loch or watercourse; and a) A detailed layout of all proposed mitigation.	An assessment of potential impacts of the Proposed Development on watercourses and the water environment, and proposed mitigation measures will be included in the Hydrology and Hydrogeology Chapter of the EIA Report, as well as a figure displaying infrastructure overlain with all lochs and watercourses and a 50m buffer.
	If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	This information will be included in the CEMP prepared by the Applicant's appointed Principal Contractor. A Draft CEMP will be included in the EIA Report as a Technical Appendix.
	Watercourse crossings must be designed to accommodate the 0.5 % Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures.	Information on detailed design of watercourse crossings will be provided in the Hydrology and Hydrogeology Chapter of the EIA Report and associated Technical Appendices.
Peat and Carbon Rich Soils	The planning submission must demonstrate how the layout has been designed to minimise disturbance of peat and outline relevant mitigation measures.	The Site Selection and Design Evolution Chapter of the EIA Report will detail how the Proposed Development has been designed to minimise disturbance of peat. Construction methodologies and mitigation measures will be described in the PLHRA and Draft PMP which will be included in the EIA Report as Technical Appendices.
	The submission must include: a) A detailed map of peat depths with all the built elements overlain; and b) A table which details the quantities of acrotelmic, catotelmic and	a) Peat depths will be indicated on Figure(s) associated with the draft PMP, which will be included as a Technical Appendix.

Topic	Scoping Comment	Response to Consultee
	amorphous peat which will be excavated for each element and where it will be re-used during reinstatement.	b) A table which details the types and quantities of peat to be excavated and anticipated reinstatement will be included in the Draft PMP, which will be included as a Technical Appendix.
	The proposal must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste, and SEPA's Developments on Peat and Off-Site uses of Waste Peat.	The information presented in the Geology and Carbon Balance Chapter of the EIA Report and its associated appendices will be in accordance with the noted guidance.
	The Applicant must consider whether a full PMP is required.	A draft PMP will be included in the EIA Report as a Technical Appendix. A full PMP will be prepared by the Applicant's appointed Principal Contractor prior to construction.
GWDTE	<p>The submission must include:</p> <p>a) A map demonstrating that all GWDTE are outwith a 100 m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions; and</p> <p>b) If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and/or quantitative risk assessment will be required.</p>	<p>a) A figure(s) indicating potential GWDTE areas and the noted buffers overlain with the Proposed Development infrastructure will be included in the EIA Report.</p> <p>b) A site-specific assessment of GWDTE will be included in the EIA Report as a Technical Appendix.</p>
Groundwater Abstractions	<p>The submission must include:</p> <p>a) A map demonstrating that all 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; and</p> <p>b) If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and/or quantitative risk assessment will be required.</p>	Information will be provided in the Hydrology and Hydrogeology Chapter of the EIA Report and associated Technical Appendices, as required.
Borrow Pits	<p>The following information should be submitted for each borrow pit:</p> <p>a) A map showing the proposed borrow pit location, size, depths and dimensions;</p> <p>b) A map showing any stocks of rock, overburden, soils, infrastructure</p>	<p>a) Maps will be included as part of the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix;</p> <p>b) This information will be detailed in the Draft CEMP, which will be</p>

Topic	Scoping Comment	Response to Consultee
	<p>and drainage, overlain with all lochs and watercourses to a distance of 250 m;</p> <p>c) Justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated;</p> <p>d) A ground investigation report giving existing seasonally highest water table;</p> <p>e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge;</p> <p>f) A site map showing proposed water abstractions;</p> <p>g) A site map showing the location of pollution prevention measures;</p> <p>h) A site map showing where soils and overburden will be stored and a detailed map of peat depths with all the built elements and excavation areas overlain;</p> <p>i) Sections and plans detailing how restoration will be progressed; and</p> <p>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.</p>	<p>included in the EIA Report as a Technical Appendix;</p> <p>c) The suitability of borrow pits will be discussed in the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix;</p> <p>d) A ground investigation will be undertaken post consent to inform borrow pit design.</p> <p>e) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>f) This information will be detailed in the Draft CEMP, which will be included in the EIAR as a Technical Appendix;</p> <p>g) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>h) Proposed peat storage areas and dimensions will be presented in the draft PMP, which will be included in the EIA Report as a Technical Appendix; and</p> <p>i) Indicative borrow pit restoration profiles will be provided in the PMP, which will be included in the EIA Report as a Technical Appendix.</p> <p>j) Further details of phasing and rock processing, etc., will be provided post-consent.</p>
Schedule of Mitigation	A Schedule of Mitigation supported by site specific maps and plans must be submitted. This must include reference to best practice pollution prevention and construction techniques, regulatory requirements and the responsibilities of the Environmental Clerk(s) of Works (EcoWs).	A Schedule of Mitigation, summarising all mitigation measures set out within the EIA Report, will be included in the EIA Report. Further information will also be provided in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
Pollution and Waste	The submission must demonstrate that there will be no discarding of materials that are likely to be classified as waste.	Waste management will be addressed in the draft CEMP, which will be included in the EIA Report as a Technical Appendix. It is not anticipated that any excavated waste materials would be generated during the works as all would be re-used on site.

Non Statutory Consultee Scoping Responses

- 3.2.8 Issues raised in scoping responses received from non-statutory consultees during the 2019 and 2020 Scoping exercises have also been taken into account by the Applicant, as detailed in Appendix 1 and Appendix 2 of this report.

3.3 Further Consultee Engagement

- 3.3.1 Further engagement has been undertaken with relevant parties since receipt of the 2019 Scoping Opinion, notably ECU, THC, NS, the John Muir Trust and RSPB Scotland, as described below.

Energy Consents Unit

- 3.3.2 The Applicant has maintained dialogue with the ECU throughout the EIA process, and sought advice specifically on the scoping refresh process and liaison with SEPA following the SEPA cyber-attack.
- 3.3.3 Recently, the Applicant provided an update on the project to ECU on 11 March 2021 (via Teams Meeting), including an overview of the project's history, key constraints, submission timescales and further consultations.

The Highland Council

- 3.3.4 The Applicant has maintained dialogue with THC throughout the EIA process. This has included seeking confirmation with regard to the selection of viewpoint locations and other wind farm sites to be included in the cumulative assessment, as well as providing general project updates and layout information.
- 3.3.5 More specifically, a meeting between the Applicant (including the Applicant's appointed noise consultant) and an Environmental Health Officer from THC (hereafter referred to as the 'THC EHO') took place on 26 May 2020 (via phone) to discuss the approach and methodology for baseline noise surveys and assessment.
- 3.3.6 Following this meeting, The Applicant provided a methodology to the THC EHO confirming approach and programme for noise surveys. This consultation will be detailed in the Noise Chapter of the EIA Report.

John Muir Trust

- 3.3.7 Following a request from John Muir Trust, the Applicant provided an update on the Proposed Development to the John Muir Trust on 25 February 2021.

NatureScot

- 3.3.8 NatureScot have been kept informed and consulted throughout all stages of the EIA process. In parallel with THC, NatureScot were consulted on viewpoint selection and cumulative assessment as part of the Landscape and Visual Assessment. A ZTV and an indicative layout of the Proposed Development was provided to NatureScot as part of the 2020 Scoping Refresh Letter.
- 3.3.9 The Applicant also provided NatureScot with baseline habitat and peat depth information, seeking comments on the layout in respect of this information.
- 3.3.10 The Applicant's ecological consultant contacted NatureScot on 27 May 2020 (via email) to confirm the bat survey approach and methodology for the Proposed Development. NatureScot responded on 08 June 2020 to confirm approach (including the acceptance to the delay of Spring surveys due to Covid restrictions). The Applicant contacted NatureScot in July 2020 to follow up on NS feedback and provide further clarification on bat survey works.

RSPB Scotland

- 3.3.11 A meeting with RSPB Scotland took place on 07 April 2021 to provide a project update. The Applicant also intends to issue a letter to RSPB Scotland (via email) to clarify comments in response to the 2020 Scoping Refresh Letter, in relation to the ornithological assessment.

Scottish Environment Protection Agency (SEPA)

- 3.3.12 Further consultation had been planned with SEPA to provide updated layout, habitat and peat depth information during early 2021. However, it was not possible to engage with SEPA at this time or during other pre-application discussions as a result of the SEPA cyber-attack in December 2020.

3.4 Community Engagement

- 3.4.1 In parallel with the statutory consultation process, consultation with the local community has been undertaken in the form of Public Exhibitions and meetings with local Community Councils.

Public Exhibitions

- 3.4.2 Public exhibition events were held within the local area in 2019 to allow members of the general public to obtain information and pass comment upon the Proposed Development.
- 3.4.3 Public Exhibition events included:
- 27th November 2019 (3pm to 7pm) – Rosehall Village Hall; and
 - 28th November 2019 (10am to 4pm) – Lairg Village Hall.
- 3.4.4 The events were advertised in the local area and in local newspapers, and the Applicant made contact with the community council and local councillors and a local MSP directly, to inform them of the upcoming event. Information about the exhibition was also advertised on the project webpage and a post card advertising the exhibition was sent to 1576 local properties within a 15km radius from the site entrance.
- 3.4.5 Exhibition boards and maps for the Proposed Development were on display at the event to introduce the project, explain the proposal, next steps and provide contact details. The events allowed the project team to engage with visitors, listen to feedback and answer questions.
- 3.4.6 Further public engagement events are planned w/c 24th May 2021. These events will be held virtually in light of the Covid-19 pandemic but will provide the local community and interested parties an update on the project prior to submission of the Section 36 application.

Community Council Consultation.

- 3.4.7 Meetings with Community Councils have included:
- Creich Community Council: Presentation (via Zoom call) to the Community Council regarding the Proposed Development on 19 January 2021; and
 - Ardgay and District Community Council: Presentation (via Zoom call) to the Community Council regarding the Proposed Development on 08 March 2021.

-
- 3.4.8 A representative from the Kyle of Sutherland Development Trust and the local Councillor attended the presentation presented to Creich Community Council on 19 January 2021.
- 3.4.9 Lairg Community Council and Rogart Community Council have also been contacted by the Applicant. Lairg Community Council have confirmed that they do not require a presentation on the Proposed Development at this point, as they have received a copy of the presentation, however, they have requested a separate meeting along with representatives from neighbouring community council's and the Applicant's community team, to discuss Community Benefit. Rogart Community Council have not yet responded to confirm whether they require an update on the Proposed Development.

Pre-Application Consultation Report

- 3.4.10 The feedback received during the public exhibition event and community council meetings will be recorded within the Pre-Application Consultation (PAC) Report to be submitted as an appendix to the EIA Report.

4. Submission Information

4.1 Submission

- 4.1.1 It is the intention to submit a Section 36 application for the Proposed Development during Summer 2021.

4.2 Advertisement

- 4.2.1 It is anticipated the application will be advertised in the Edinburgh Gazette, the Herald and the Northern Times newspapers. The advert will describe the application, state where copies of the EIA Report can be viewed, state a date by which any persons can make representations to the Scottish Ministers in relation to the application, and the address to where representations are to be sent. A draft version of the advert will be provided to the ECU for comment and approval ahead of arranging the publications.

4.3 Public Viewing of EIA Report

- 4.3.1 The EIA Report will be available to view on the application website at <https://www.sserenewables.com/onshore-wind/in-development/achany-extension/> or on the Scottish Government Energy Consents website at www.energyconsents.scot. Due to the ongoing Covid-19 Pandemic, and in line with the Coronavirus (Scotland) Act 2020³, it is not anticipated that a hard copy of the EIA Report will be made available for viewing at any publicly accessible location, including the Scottish Government Library at this time.

4.4 Consultee Lists

- 4.4.1 The list of consultees to be informed of the submitted EIA Report will be agreed with the ECU. It is anticipated to include those consultees in receipt of the 2019 Scoping Report, as noted in Table 4.1.

Table 4.1: Consultees to be informed of the EIA Report

Statutory Consultees	
The Highland Council (THC)	Scottish Environmental Protection Agency (SEPA)
Historic Environment Scotland (HES)	NatureScot (NS)
Non Statutory Consultees	
Civil Aviation Authority (Airspace)	Radio Network Protection
Defence Infrastructure Organisation (MOD)	Royal Society for the Protection of Birds (RSPB) Scotland
Fisheries Management Scotland	Scottish Council for Development and Industry Highlands (SCDI) (Highlands & Islands)
Friends of the Earth Scotland	Scottish Forestry
Highlands and Islands Airports	Scottish Water

³ Scottish Government (2020): Coronavirus (Scotland) Act 2020. Available at: <https://www.legislation.gov.uk/asp/2020/7/contents> (Accessed 24 March 2021)

Statutory Consultees	
Inverness Chamber of Commerce	Scottish Wildland Group
John Muir Trust	Scottish Wildlife Trust
Joint Radio Company (JRC)	Scotways
Kyle of Sutherland Development Trust	The Crown Estate Scotland
Kyle of Sutherland District Fisheries Board	Transport Scotland
Marine Scotland	Visit Scotland
Mountaineering Scotland	World Wildlife Fund (WWF) Scotland
National Air Traffic Services (NATS) Safeguarding	
Community Councils	
Ardgay and District Community Council	Lairg Community Council
Creich Community Council	Rogart Community Council

5. Conclusion

- 5.1.1 The Applicant welcomes any comments that the ECU or any of the statutory consultees may have in relation to this Gate Check Report.

Figures

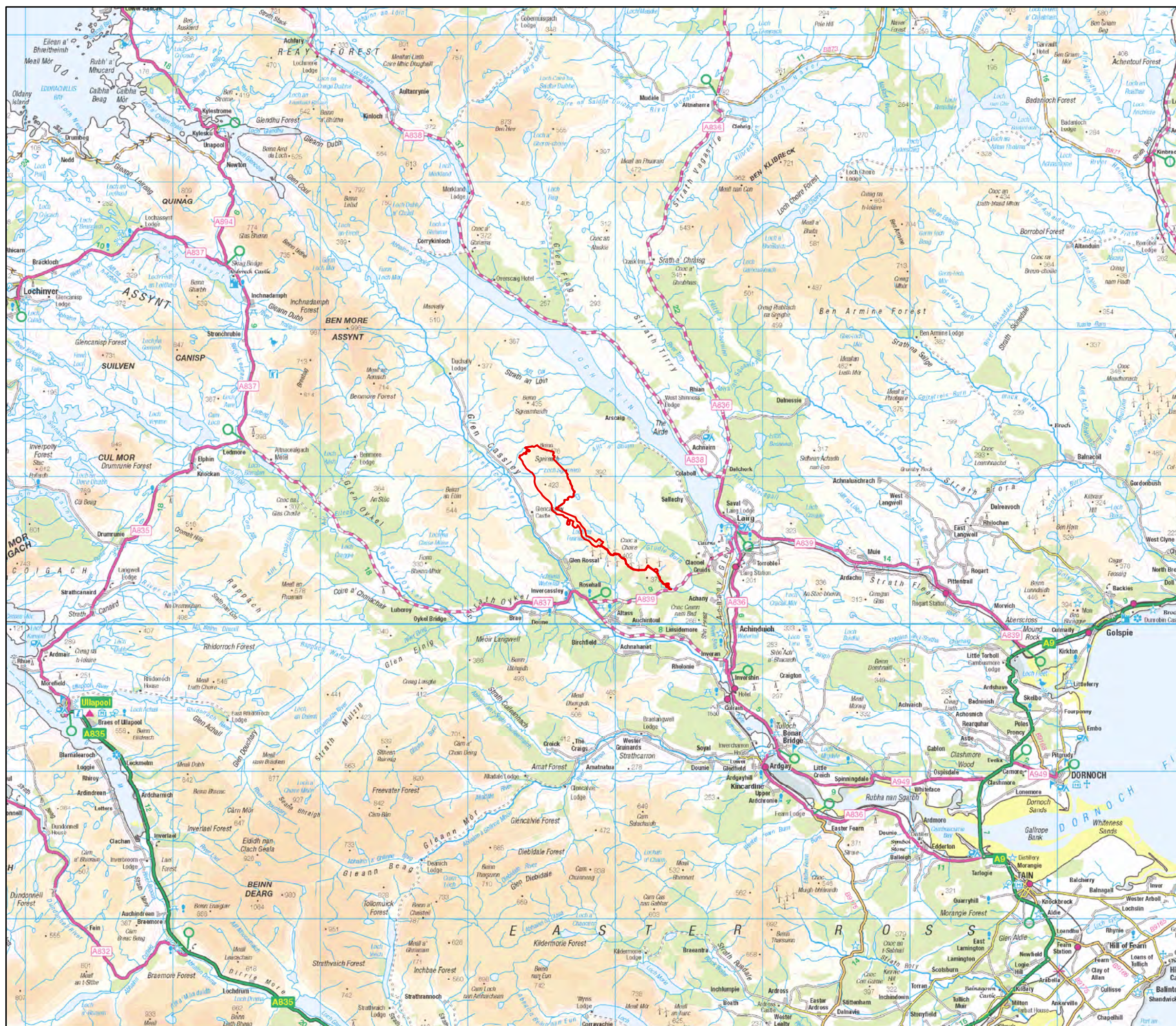
Figure 1: Site Location

Figure 2: Site Layout

Figure 3: Site Context

Key

Site Boundary



Scale 1:250,000@ A3
0 5 10 Km



Figure 1
Location Plan

Achany Extension Wind Farm
Gate Check Report

Key

- Site Boundary
- Proposed Turbine
- LiDAR
- Proposed Access Track
- Temporary Track
- LiDAR Track
- Hardstanding
- Borrow Pit Search Area
- Temp. Construction Compound, Security, Storage and Batching Plant
- Extension to existing operations building
- Substation, Welfare Facility and Store
- Temp. Construction Compound, Security and Storage

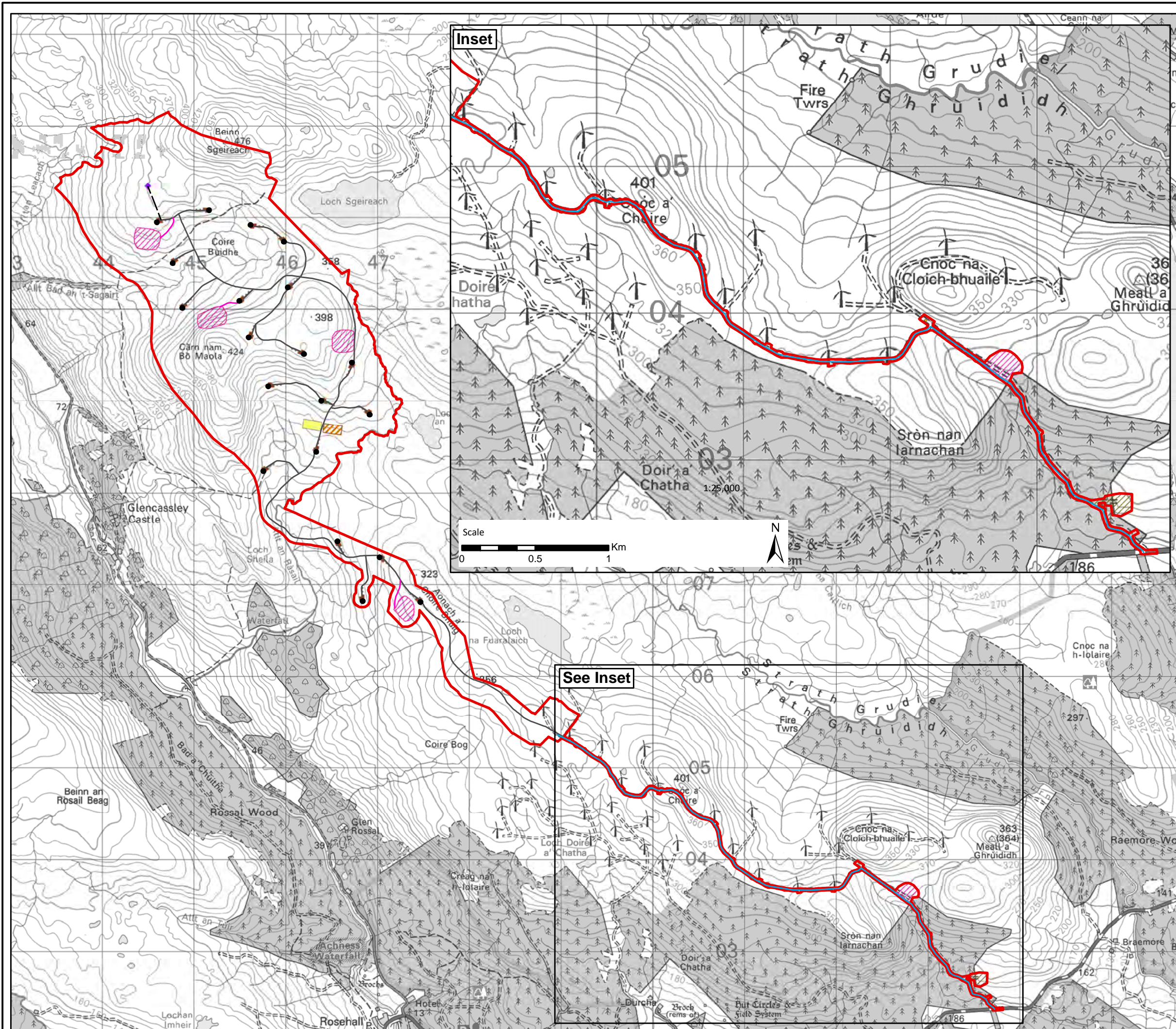
Scale 1:40,000 @ A3

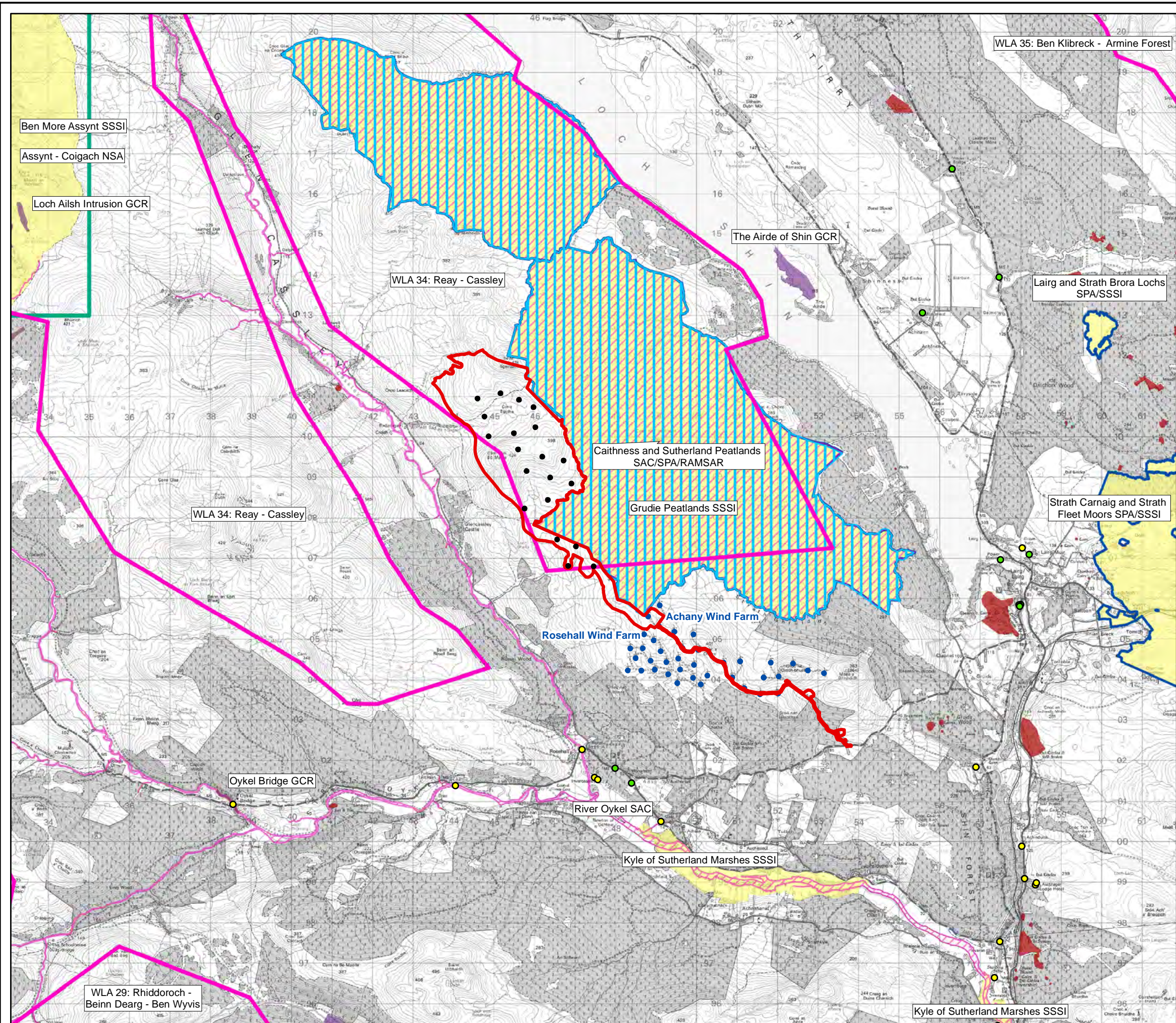
0 1 2 Km

N

Figure 2
Site Layout

Achany Extension Wind Farm
Gate Check Report





- Key**
- Site Boundary
 - Proposed Turbine
 - Operational Turbine
 - RAMSAR Wetland of International Importance
 - Special Protection Area (SPA)
 - Special Area of Conservation (SAC)
 - Site of Special Scientific Interest (SSSI)
 - Geological Conservation Review (GCR)
 - National Scenic Area (NSA)
 - Wild Land Area (WLA)
 - Scheduled Monument (SM)
 - Listed Building Category B
 - Listed Building Category C

Scale 1:90,000 @ A3
0 1 2 Km



Figure 3
Site Context
Achany Extension Wind Farm
Gate Check Report

Appendix 1: 2019 Scoping Matrix

Abbreviations

SM	Scottish Ministers
BT	British Telecom
DIO	Defence Infrastructure Organisation
HIAL	Highlands and Islands Airport
HES	Historic Environment Scotland
KSF	Kyle of Sutherland District Salmon Fishery Board
MS	Mountaineering Scotland
MSS	Marine Scotland Science
NATS	NATS Safeguarding
NS	NatureScot
RSPB	Royal Society for the Protection of Birds
SEPA	Scottish Environmental Protection Agency
SF	Scottish Forestry
SNH	Scottish Natural Heritage (now NatureScot)
SW	Scottish Water
TS	Transport Scotland
THC	The Highland Council
VS	Visit Scotland

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
1	Borrow Pit	The EIA Report should include search areas of the proposed locations for on-site borrow pits and present high level details on the borrow pit design including indicative borrow pit plans.	SM 01	2	A Borrow Pit Report will included in the EIA Report as a Technical Appendix.
2	EIA Scope	Scottish Ministers are satisfied with the scope of the EIA set out in section 5 of the scoping report.	SM 02	4	Noted.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
3	Drinking Water Protected Areas	The Company should contact SW to make further enquiries about whether there are any drinking water protected areas or Scottish Water assets which the Proposed Development could affect. Details should be presented in the EIA Report along with any relevant mitigation measures.	SM 03	4	Further details, including relevant mitigation measures, will be provided within the Hydrology and Hydrogeology Chapter of the EIAR Report and the Draft CEMP (to be provided as a Technical Appendix).
4	Private Water Supplies	Private water supplies within close proximity of the Proposed Development which may be impacted should be investigated. Details of the supplies should be included in the EIA Report along with an assessment of the potential impact, risks and any mitigation that would be provided.	SM04	4	Details of private water supplies located within a 5km buffer of the site have been reviewed. An assessment of potential impacts on relevant PWS and other groundwater abstractions will be included in the Hydrology and Hydrogeology Chapter of the EIAR Report and within a separate Private Water Supplies Technical Appendix.
5	Fisheries	Advice provided by MSS and KSF in relation to guidelines on survey / monitoring programme should be taken on board.	SM05	5	Fish surveys have been carried out, with results and appropriate mitigation detailed in the Ecology Chapter of the EIA Report. Baseline water quality monitoring would be carried out pre-construction and subsequent monitoring during construction and operation in

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					line with the CEMP to be adopted by the Applicant's appointed Principal Contractor. A Draft CEMP will be included in the EIA Report as a Technical Appendix.
6	Peat	Peat depth and vegetation surveys along with a peat management plan (PMP) will be required to be part of the EIA Report along with a Peatslide Hazard Risk Assessment (PLHRA).	SM06	5	Peat depth and vegetation surveys, including peatland condition assessment surveys, have been carried out. The results of these surveys will be detailed in the Geology and Carbon Balance Chapter of the EIA Report. A Draft PMP AND PLHRA will also be included in the EIA Report as a Technical Appendices.
7	Wild Land	Scope and methodology of wild land assessments should be decided in discussion with SNH (now NatureScot).	SM07	5	The Wild Land Assessment will be completed in accordance with NatureScot's Wild Land Assessment Guidance: 'Assessing Impacts on Wild Land Areas – Technical Guidance' (NatureScot, 2020). Confirmation of the approach

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					has been discussed with NatureScot.
8	Viewpoints	Viewpoints should be agreed with THC, SNH (now NatureScot), HES and MS and presented in the EIA Report.	SM08	5	Viewpoint locations have been determined following review of advice provided through the Scoping process, and through further consultation with THC and NatureScot. A final viewpoint list was agreed with THC and NatureScot.
9	Aviation Lighting	Further advice on aviation lighting is available from SNH (now NatureScot). Depending on the scale and location of turbines, the LVIA should include a robust night time assessment.	SM09	5	The selection of a turbine with tip height below 150m removes the requirement for visible aviation lighting.
10	Scheduled Monument	The EIA Report should consider the impacts on the scheduled monument Dail Langwell, broch and other heritage assets.	SM10	5	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage Chapter of the EIA Report.
11	Management Plans	The Company should take on board THC's comments regarding Habitat Management Plan (HMP), Deer Management Plans (DMP) (if any are present within the site) and Biodiversity Action Plan.	SM11	5	An Outline HMP and a DMP will be provided as a Technical Appendices to the EIA Report. The Outline HMP will aim to restore and enhance blanket bog.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
12	Bird Survey	The Company should take note of RSPB's advice in respect to 'scoped in effects' to be assessed. The Company should discuss bird survey methodology with SNH (now NatureScot) and RSPB.	SM12	5, 6	Advice from RSPB has been noted in developing the scope of ornithology surveys. Further consultation has been undertaken with RSPB, and details will be provided in the ornithology chapter of the EIA Report.
13	Discussion	Scottish Ministers would like to be kept informed of relevant discussions.	SM13	6	The Energy Consents Unit of the Scottish Government have been kept informed throughout the EIA stages through telephone, email and virtual meetings.
14	Schedule of Mitigation	Mitigation measures suggested for any significant environmental impact identified should be presented as a conclusion to each chapter. A consolidated schedule, in tabular form, of all mitigation measures proposed, should be included in the EIA Report.	SM14	6	Mitigation measures will be identified within each Technical Chapter. A Schedule of Mitigation Measures will be included in the EIA Report.
15	Pre-application Advice	Applicants are encouraged to engage with the ECU at pre-application stage, before the proposal reaches design freeze.	SM15	6	The Energy Consents Unit of the Scottish Government have been kept informed throughout the EIA stage through telephone, email and virtual meetings.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
16	Scoping Matrix	The EIA Report should include a summary, in tabular form, of where within the EIA Report each of the specific matters raised in the scoping opinion have been addressed.	SM16	6	Confirmation of where each matter raised in the 2019 scoping opinion and the subsequent 2020 scoping refresh have been addressed will be included in the relevant chapters of the EIA Report, as well as a Scoping Matrix, included as a Technical Appendix..
17	File Size	The EIA Report and its associated documentation should be divided into appropriately named separate files of size no more than 10 MB. A separate disc containing the EIA Report in electronic format will be required.	SM17	7	A CD / USB will be provided containing the EIA Report and all associated documentation with maximum individual file sizes of 10MB.
18	Radio Protection Network	BT has studied the Proposed Development with respect to EMC and related problems to BT point-to-point microwave radio links. The Proposed Development, as indicated, should not cause interference to BT's current and presently planned radio network.	BT 01	43-44	Noted.
19	Military Aviation	The Ministry of Defence (MOD) has no objection to the Proposed Development. This is based on the submitted cardinal points and the proposal for 26 turbines at 231 m to tip.	DIO 01	31	Potential effects of the Proposed Development on MOD infrastructure will be assessed within the Aviation chapter of the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
20		In the interests of air safety, the MOD will request that the Proposed Development be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.	DIO 02	31	CAA aviation lighting requirements in accordance with Article 219 of the Air Navigation Order come into effect at a height of 150m. As the turbines would be less than 150m to blade tip the Applicant would instead agree a suitable aviation lighting scheme with the MOD in accordance with MOD obstruction lighting guidance.
21		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.	DIO 03	31	Potential effects of the Proposed Development on MOD infrastructure will be assessed within the Aviation chapter of the EIA Report. The DIO have been consulted at scoping and scoping refresh, and will be consulted on submission of the application.
22		<p>If permission is granted for the Proposed Development, MOD would like to be advised of the following:</p> <ul style="list-style-type: none"> • The date construction starts and ends; • The maximum height of construction equipment; and • The latitude and longitude of every turbine. 	DIO 04	32	The MOD will be kept updated and consulted on the progress of the application.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
23		If the application is altered in any way, MOD must be consulted again as even slight changes to result in unacceptable effects.	DIO 05	32	The MOD will be kept updated and consulted on the progress of the application.
24	Cultural Heritage	HES can confirm there are no scheduled monuments, category A-listed buildings, inventory gardens and designed landscape or inventory battlefield within the Proposed Development site. There are some heritage assets within the surrounding area including one scheduled monument: Dail Langwell broch located 2 km south-west of the site. It is possible the Proposed Development would be visible from the broch, or important views towards it, and have an impact on its setting. Further consideration should be given to assessing impacts in the EIA. Visualisations are expected that assess the impact of the turbines on the setting of the broch.	HES 01	34-35	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage chapter of the EIA Report. A visualisation from Dail Langwell Broch will also be provided.
25		Where significant impacts are identified they should be reduced or avoided by amendments to the design.	HES 02	35	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage chapter of the EIA Report.
26	EIA Policy	On 1 May 2019, HES adopted new Historic Environment Policy for Scotland.	HES 03	35	Noted.
27	Aviation Safeguarding	HiAL carried out an assessment utilising a maximum ground height of 476m and a turbine height of 150m. The calculations showed that, at the given position and height, the Proposed Development would not infringe the safeguarding surfaces for Wick or Inverness airport. Exact turbine locations and confirmed height are required to provide further comment.	HiAL 01	33	Potential effects of the Proposed Development on aviation safeguarding will be assessed within in the Aviation chapter of the EIA Report.
28	Fisheries	Kyle of Sutherland District Salmon Fishery Board would expect any environmental assessment to include:	KSF 01	36	Fish surveys have been carried out, with results and appropriate

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<ul style="list-style-type: none"> Fish habitat data in any potentially affected watercourse both within and out with the physical boundary of the Proposed Development; Fish presence, distribution and abundance data in all potentially affected watercourses; Macro-invertebrate data in all potentially affected watercourses; Freshwater pearl mussel (FWPM) abundance and distribution data in all potentially affected watercourses; Hydrology data, including artificial drainage watercourses; Water quality data (i.e. turbidity, pH, dissolved organic carbon, acid-neutralising capacity, etc.) in all potentially affected watercourses; and Peat slide risk assessment. 			mitigation to be detailed in the Ecology chapter of the EIA Report. Baseline water quality monitoring would be carried out pre-construction and subsequent monitoring during construction and operation in line with the CEMP adopted by the Applicant's appointed Principal Contractor. A Draft CEMP will be provided as a Technical Appendix to the EIA Report. A PLHRA will also be included in the EIA Report as a Technical Appendix.
29	Fish Surveys and Pearl Mussel	KSF note that the Applicant highlights data obtained from targeted fish surveys undertaken as part of a previous application in the scoping report. KSF suggest that such information is likely to be outdated and new surveys should be undertaken. KSF believe that investigations into the status of pearl mussel populations within the Cassley catchment have been carried out subsequent to the original application and suggest that SNH (now NatureScot). be contacted to obtain any relevant information available from such surveys.	KSF 02	37	Fish surveys have been carried out, and the results and appropriate mitigation will be detailed in the Ecology Chapter of the EIA Report.
30	Land Drainage	KSF has become increasingly aware of the extent of land drainage within the district. These artificial drainage features have the potential to act as vectors for the transfer of silt, pollutants, etc. to larger watercourses. KSF would therefore ask that, if present within the Proposed Development site, all drainage features	KSF 03	37	This is noted and will be taken into account in the Ecology and the Hydrology and Hydrogeology chapters of the

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		are fully taken into account when undertaking any environmental impact assessment.			EIA Report. An Outline Habitat management Plan will also be included in the EIA Report as a Technical Appendix.
31	LVIA	The impact of the experience of Ben More Assynt will be primary but there are many other hills that could be impacted, especially given the intrusions of Creag Riabhach into many angles of view previously without turbines in near proximity.	MS 01	41	This will be considered in the Landscape and Visual Chapter of the EIA Report.
32	Need for the Development	An application would need to demonstrate that this site specifically is required to meet electricity generation needs.	MS 02	41	The need for the project will be set out in the EIA Report. The Proposed Development could contribute to legislated climate change targets and government policy objectives in helping Scotland to reduce its greenhouse gas emissions to net-zero by 2045 at the latest.
33	Visual Amenity	An application is likely to raise many of the same visual impact concerns as the previous application. An explicit comparison with the previous application is required to demonstrate what extent previous concerns (and reasons for refusal) remain applicable and to what extent they have been overcome.	MS 03	41	This will be considered in the Design Statement, to be included in the EIA Report as a Technical Appendix.
34	LVIA Study Area	The proposed detailed study area of 15 – 20km is too small (Scoping Report, page 17). It could exclude Creag Riabhach, Ben Hee and Seana Bhraigh, all of which are likely to have clear views of the Proposed Development at distances of under 25 km. A detailed study area radius of not less than 25 km is requested.	MS 04	41	The extent of the detailed study area has been agreed in consultation with THC. Ben Hee and Seana Braigh will both be included as VPs (VP5 and VP19) and therefore well

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					accommodated within the assessment. Creag Riachach is a hill in the vicinity of Seana Braigh and this area is considered adequately represented by the Seana Braigh VP.
35	Wild Land	While Mountaineering Scotland agree that the primary focus for wild land assessment requires to be the Reay-Cassley Wild Land Area (WLA), and are not unsympathetic to the idea that significant effects on other WLAs may be limited, this needs to be demonstrated and not simply asserted.	MS 05	41	Wild Land Assessments will be undertaken for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee), in agreement with NatureScot.
36	Viewpoints	The proposed viewpoints set out in the scoping report are acceptable, with the exception of the omission of Viewpoint 18. It does not matter if it has the same (mobile) receptors: it is from a different location at different angle and distance to the Proposed Development. Furthermore, it seems possible that the Proposed Development will not be seen 'through' the existing wind farms, as is claimed, but as a lateral extension to them, which is a very different prospect.	MS 06	41	VP 18 has been reinstated as a viewpoint and will be included in the landscape and visual assessment.
37	Wirelines and LVIA	Mountaineering Scotland note that the proposal to present only a wireline for Ben Hee is based on an assumption of lack of significant impact justified solely by distance without regard to context or scale of development. Mountaineering Scotland expect that the Landscape and Visual Impact Assessment itself to be less simplistic in its approach.	MS 07	41	Full visualisation material will be included for all VPs to NatureScot and THC standards.
38	River Oykel SAC	The Proposed Development is drained by watercourses within the River Cassley which forms part of the River Oykel Special Area of Conservation (SAC); salmon is a qualifying feature for this designation status. Both salmon and trout are listed	MSS 01	38	This will addressed in the Ecology Chapter of the EIA Report. A HRA will also be

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		as priority species for conservation in the Scottish Biodiversity List and should be considered.			undertaken and included in the EIA Report as a Technical Appendix.
39	Water Quality and Fish	<p>MSS advise that the Applicant carries out the following in the EIA:</p> <ul style="list-style-type: none"> Consult the MSS generic scoping guidelines; Site characterisation surveys of the water quality and fish populations within the watercourses which could potentially be impacted as a result of the Proposed Development. Surveys should follow MSS guidelines on survey / monitoring programmes. The results from the surveys should be presented in the EIA Report along with a detailed description of proposed mitigation measures and monitoring programmes; and Consider the potential cumulative impacts on water quality and fish populations associated with adjacent (operational and consented) wind farms and hydro schemes, particularly in the selection of control sites in the monitoring programmes. 	MSS 02	38-39	Fish surveys have been carried out, with results and appropriate mitigation detailed in Ecology Chapter of the EIA Report. Baseline water quality monitoring would be carried out pre-construction and subsequent monitoring during construction and operation in line with the CEMP to be adopted by the Applicant's appointed Principal Contractor. A Draft CEMP, will be included in the EIA Report as a Technical Appendix.
40	Aviation Safeguarding	The Proposed Development has been examined from a technical safeguarding aspect and does not conflict with NATS' safeguarding criteria. NATS has no safeguarding objection to the Proposed Development. If the Proposed Development is revised, amended or a further application for approval made, NATS must be further consulted.	NATS 01	42	Potential effects of the Proposed Development on aviation safeguarding will be assessed within the Aviation chapter of the EIA Report.
41	Wild Land Areas	SNH (now NatureScot) provided extensive advice on the previous wind farm development at the same general location as this new proposal, and are	NS 01	57-58	Changes have been made to the turbine layout in comparison to the previous application in

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>therefore surprised to see that the revised proposal remains within a Wild Land Area, as it is highly likely that these impacts will still occur:</p> <p><i>"We maintain our objection to Glencassley wind farm due to the significant adverse impacts on wild land, now identified as the Reay-Cassley WLA.</i></p> <p><i>We remain of the view that both Glencassley and Sallachy wind farms, individually and cumulatively, will have significant adverse effects on the wildness attributes of the Reay-Cassley WLA, and that it has not been demonstrated that these can be substantially overcome by siting, design or other mitigation. We do not consider that these effects can be avoided due to the nature and location of the proposed developments within the WLA. We therefore conclude that neither wind farm complies with the relevant policy tests in Scottish Planning Policy (SPP) for wild land."</i></p>			order to minimise landscape and visual effects, and in particular those effects on wild land, and a National Scenic Area.
42	Pre-application Advice	<p>Due to siting turbines, particularly of this height, within this sensitive location and the expected significant effects, NatureScot would be eager to meet SSE to help explore alternatives or discuss other solutions to reduce adverse impacts. If this scheme progresses at this location, NatureScot will be particularly looking to see how SSE addresses the impacts which we previously identified and any new impacts that are likely to arise. These include, but are not limited to:</p> <ul style="list-style-type: none"> • The degree to which the proposal affects the wild qualities identified for Reay-Cassley WLA; • The degree to which turbine lighting (due to turbine height) is to be required, which is likely to affect the wild land qualities of two different Wild Land Areas (Reay-Cassley and Foinaven-Ben Hee); and • The cumulative effects from this and other wind farms on these Wild Land Areas. 	NS 02	58	Contact with NatureScot has been maintained throughout the EIA process to provide project updates or seek clarification / advice on certain matters. A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). There is no

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					requirement for assessment of visible turbine lighting as the turbine height has been fixed at 149.9 m, which removes the requirement for visible aviation lighting.
43	Wild Land Areas	NatureScot recommend that the Applicant should undertake an assessment of effects on wild land using the 2017 consultative draft guidance as a starting point. Due to this evolving area of work, NatureScot strongly advise that the landscape consultant should discuss the scope of the wild land assessment with NatureScot at an early stage. In due course, NatureScot request hard copies of any visuals that may be contained within the wild land assessment as part of the EIA submission.	NS 03	58	The Wild Land Assessment has will be completed in accordance with NatureScot's Wild Land Assessment Guidance: 'Assessing Impacts on Wild Land Areas – Technical Guidance' (NatureScot, 2020). Confirmation of the approach has been discussed with NatureScot.
44		NatureScot acknowledge turbine lighting may be required for these large scale turbines. Turbine lighting has the potential to result in significant effects on the appreciation of key attributes of this WLA such as: remoteness, sense of sanctuary and solitude which under-pin how the qualities are experienced. Darkness is a key contributing characteristic to the appreciation of WLAs.	NS 04	58	The selection of a turbine with tip height below 150m removes the requirement for visible aviation lighting.
45	Turbine Lighting assessment in LVIA	NatureScot recommend that the effects of lighting on both WLAs should be carefully assessed and that mitigation is employed to reduce impacts. NatureScot recommend that an LVIA-related lighting assessment should be incorporated within the EIA Report and include:	NS 05	58	The selection of a turbine with tip height below 150m removes the requirement for visible aviation lighting.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<ul style="list-style-type: none"> 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 specific turbines would be lit and a table which lists how many lit turbines would be visible from each viewpoint; Production of a ZTV map which shows the areas from which the nacelle and tower lights may be seen; Night-time visualisations from a limited number (NatureScot suggest two or three) of representative viewpoints within WLA 35 and 37 (other consultees may wish to include other locations outwith WLAs); Annotation of the positions of turbine lighting (including intermediate tower lights) on all wirelines from every viewpoint; and Written assessment based on fieldwork for all viewpoints in a worst case scenario. 			
46	Ornithology	As this proposal abuts a component part of the Caithness and Sutherland Peatlands SPA, Ramsar Site and SAC, protected for its upland birds, peatland habitats and otter, there is a high risk that the Proposed Development could impact on a range of upland birds connected to the SPA (within and outwith the site), such as: divers, golden plover and greenshank. Issues such as displacement, disturbance and collision risk should be assessed for all stages of the Proposed Development.	NS 06	59	Potential impacts on these designated sites and their qualifying features are addressed in the Ecology and Ornithology chapters of the EIA Report and their associated Technical Appendices.
47	Survey Methodology	NS note that part of the Proposed Development is not visible, as indicated in the vantage point (VP) and viewshed map (in proximity to VPs 3 and 5). NS therefore assume that turbines are not proposed in this location as impacts to SPA birds will not have been adequately assessed. Clarification of the turbine layout would help to determine whether bird survey coverage is going to be considered sufficient.	NS 07	59	NatureScot guidance has been taken into account in the selection of vantage points and vantage point locations have been determined by a combination of factors, most notably topography. Justification

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					of their selection will be provided in the Landscape and Visual Chapter and accompanying Technical Appendices.
48		As divers use some of the lochs close to the proposal, VP work should be undertaken at a time of day which will maximise flight data to gauge what level of impact, if any, that this proposal might have. If divers are found to be breeding on these lochs then focal diver observations may be required. Assessments should be carried out in context to the Conservation Objectives of the SPA.	NS 08	59	Potential impacts on divers and the qualifying features of the SPA will be addressed in the Ornithology Chapter and associated Technical Appendices.
49	Policy and Legislation	Cumulative assessment should be carried out in accordance with 'Assessing the Cumulative Impacts of Onshore Wind Farms on Birds' (SNH, August 2018).	NS 09	59	Cumulative assessment on birds will be undertaken in accordance with this guidance and reported in the Ornithology Chapter and associated Technical Appendices.
50	Hydrology and Hydrogeology	The River Oykel SAC is a very sensitive receptor, and is hydrologically connected through multiple watercourses throughout the wind farm site. Therefore, it will be important to show how effective pollution (including silt) control measures will be to ensure that good water quality conditions can be maintained during construction in all weather conditions. Impacts to this protected area should be assessed against the site's Conservation Objectives.	NS 10	59	Potential impacts on the River Oykel SAC will be addressed in the Ecology Chapter and associated Technical Appendices. Pollution control measures will be set out in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
51	EIA Scope	In context of the new development boundary, it may be possible to scope out Strath an Loin SSSI, which is 2 km to the north. This protected area is important for its bog habitat only and at this distance it is unlikely to be adversely affected (this does not include birds or otters which may still be linked to the Caithness and Sutherland Peatlands SPA or SAC). Should this proposal change, this may need to be re-evaluated.	NS 11	59	Noted. Potential impacts on designated sites will be considered in the Ecology and Ornithology chapters of the EIA Report.
52	Terrestrial Ecology	The proposal abuts Grudie Peatlands SSSI, which is protected for its nationally important bog habitat and breeding populations of upland birds, including: golden plover, dunlin and greenshank. Impacts on all these features should be assessed within the EIA Report.	NS 12	59	Potential impacts on Grudie Peatlands SSSI will be considered in the Ecology Chapter of the EIA Report.
53	Policy and Legislation	Within the 2012 application for this development, all habitats recorded were considered of local importance. SPP (2014) indicates that this may no longer be the case.	NS 13	59	The Proposed Development has evolved through an iterative design process to inform the layout and minimise placement of infrastructure on sensitive habitat (in particular near natural blanket bog) and deeper areas of peat where possible. This will be set out in the EIA Report, including consideration of planning policy.
54	Peat and Carbon Rich Soils	Carbon rich and peat soils, together with peatland habitats, extend over large areas of this site, including the area current proposed for development. NS therefore advise that SSE needs to demonstrate through the EIA Report and draft Construction Method Statement that a wind farm can be built on this site without significant loss and damage to these nationally important interests.	NS 14	60	The Proposed Development has evolved through an iterative design process to inform the layout and minimise placement of infrastructure on sensitive

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					habitat (in particular near natural blanket bog) and deeper areas of peat where possible. This has been informed through habitat, peatland condition and peat depth surveys, the results of which will be provided in the Ecology and Geology and Carbon Balance chapters of the EIA Report.
55	EIA Scope, Peat and Carbon Rich Soils	The EIA Report should consider both on-site and off-site impacts, particularly any potential effects on the adjacent Caithness and Sutherland Peatlands SAC and the downstream River Oykel SAC. This should include consideration of areas of hydrological and peat mass connectivity between the development area and protected areas. A revised Peat Slide Hazard and Risk Assessment should also consider any potential risks and impacts to both SAC sites and how these can be mitigated.	NS 15	60	Potential impacts on the Caithness and Sutherlands SAC and the River Oykel SAC will be addressed in the Ecology Chapter and associated Technical Appendices. A PLHRA will also be included in the EIA Report as a Technical Appendix.
56	EIA Scope, Ecology	NS would welcome the inclusion of an outline Habitat Management Plan within the EIA Report, which could include measures to compensate for direct and / or indirect loss of peatland habitat and function.	NS 16	60	An Outline HMP will be provided in the EIA Report as a Technical Appendix.
57	Otters	NS acknowledge that a full protected species survey will be undertaken to facilitate a thorough and accurate assessment for the EIA Report. Impacts to otters and their resting places should be assessed in context to the Caithness and Sutherland Peatlands SAC in the first instance.	NS 17	60	Protected species surveys have been undertaken, the results of which will be provided in the

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					Ecology Chapter of the EIA Report.
58	EIA Scope, Ecology	NS recommend that a Deer Assessment is included within the EIA Report. This will help show whether there will be any effect (e.g. on bog protected areas) from the local deer population during construction works, etc.	NS 18	60	An assessment of the potential impact on deer as a result of the Proposed Development is included in the Ecology Chapter of the EIA Report. A Deer Management Plan will also be prepared and provided in a Technical Appendix.
59	Survey Methodology	RSPB note that ornithological field surveys have already started and will continue until August 2019, with a possibility of extension until August 2020. As the original surveys are over five years old, RSPB advocate that the new surveys should continue until August 2020 to allow two new years of data collection as per NatureScot guidance. There is a risk that an inadequate amount of data will be collected if less than two years' data is used for the EIA.	RSPB 01	45	Two years' new surveys have been carried out in total, running from September 2018 to August 2020 (inclusive). Results have helped inform layout design and, combined with desk study data, survey data will inform the application's ornithological assessment and Habitats Regulation Assessment (HRA).
60	Habitat and Protected Species Survey	RSPB would want to see updated habitat and protected species surveys as these were last undertaken in 2011.	RSPB 02	46	The results of habitat and protected species surveys will be provided in the Ecology Chapter of the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
61	Golden Eagle	RSPB note that the 2012 application found the site to be important for sub-adult golden eagles. Concerns were raised that the construction of this wind farm could displace these eagles into less favourable areas which may result in a negative effect on recruitment to the golden eagle population, especially when considered cumulatively with similar proposed developments in the area. RSPB would recommend specific surveys targeted for golden eagle within 6 km of the site.	RSPB 03	46	Surveys included suitable habitat within 6km for golden eagle and to 1km for red and black-throated divers. All survey methodologies and results will be provided in the Ornithology Chapter of the EIA Report.
62	Red-throated and Black-throated diver	RSPB would recommend specific surveys targeted for red-throated and black-throated divers on all lochs and bog pools within 1 km of the site. Additional work to cover cryptic species such as wood sandpiper should also be included.	RSPB 04	46	Surveys included suitable habitat to 1km for red and black-throated divers. All survey methodologies and results are provided in the Ornithology Chapter of the EIA Report.
63	Vantage Points	RSPB note that the current Vantage Points (VPs) do not adequately cover the proposed access tracks and it is not clear from the Scoping Report that the new access track is included in the survey boundaries.	RSPB 05	46	Vantage point locations have been determined by a combination of factors, most notably topography. Further discussion with RSPB is being undertaken, and justification for VP selection will be provided in the Ornithology Chapter.
64		RSPB note that vantage points 3, 4 and 5 are inside the site boundary. This is contrary to NatureScot guidance which states: "It is important to minimise the	RSPB 06	46	NatureScot guidance has been taken into account in the selection of vantage points and

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>observer's effect on bird behaviour. For this reason, VPs are best located outside the survey area where possible."</p> <p>RPSB therefore recommend justifying the positions of the VPs chosen and that information is provided within the EIA Report to demonstrate that the survey data are adequate, robust and accurate, including:</p> <ul style="list-style-type: none"> • Full information on the VP work undertaken, including dates, times and weather conditions; • Maps showing VP locations that also denote viewsheds; • Maps showing raptor foraging areas; • Worked example(s) of collision risk calculations; and • Provision of raw data in order for independent verification of collision risk calculations. 			vantage point locations have been determined by a combination of factors, most notably topography. Justification of their selection will be provided in the Ornithology chapter of the EIA Report and accompanying Technical Appendices.
65	EIA Scope	All direct and indirect impacts on birds and habitats should be scoped into the assessment. These include displacement, disturbance and collision risk for birds. It would be advisable to include disturbance resulting from operation turbines as well as personnel and maintenance in the assessment.	RSPB 07	46	The scope of this assessment will be set out the Ornithology Chapter of the EIA Report.
66	Peat and Carbon Rich Soils	Peat probing carried out as part of the 2012 application indicated that peat is not extensive across the site and is generally less than 0.5 m in depth. However, there are areas of 'Class 1 – Nationally important carbon-rich soils, deep peat and priority peatland habitat' (over 0.5 m in depth) located within the site boundary. In such areas, Scottish Planning Policy states that further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation. In line with Policy 55 of the Highland Wide Local Development Plan	RSPB 08	46	Peat depth, peat condition assessment and NVC survey results will be presented in the Ecology and the Geology and Carbon Balance chapters of the EIA Report and accompanying Technical Appendices. These survey results have been used during the iterative design

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		and national guidance, the EIA Report should show how damage to peat will be avoided and we recommend all infrastructure avoids areas of deep peat.			process to inform the layout and minimise placement of infrastructure on sensitive habitat (e.g., near natural blanket bog) and deeper areas of peat where possible.
67		RSPB 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 Proposed Development. The calculator should be used as early as possible in the planning process to inform siting and micro-siting of turbines, tracks and other infrastructure.	RSPB 09	46-47	The carbon balance calculation will be undertaken and will be reported in a Technical Appendix to the EIA Report.
68	Post-construction Monitoring	The EIA Report should include plans for post-construction monitoring for collision mortality and monitoring for priority species such as breeding raptors and waders.	RSPB 10	47	The potential scope for post-construction monitoring, mitigation and any HMP will be informed by the results of the ornithological and ecological assessments. An Outline HMP will be included in the EIA Report as a Technical Appendix.
69	EIA Scope	RSPB note there is a significant amount of land identified within the site, out with the development area, which may be used for habitat management. RSPB would welcome positive management of land for wildlife, provided the mitigation hierarchy has been followed in the design of any proposal. RSPB request that a detailed HMP is prepared as part of the EIA and submitted with any application. In the 2012 application, RSPB commended proposed drain blocking to improve	RSPB 11	47	An Outline HMP will be provided in a Technical Appendix to the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		habitat in the long term which could help reverse the unfavourable status of golden plover on the SPA.			
70	Pre-application Advice	SEPA would welcome the opportunity to provide early advice on the proposed layout and peat management and groundwater dependent terrestrial ecosystem (GWDTE) sections of the EIA Report before they are formally submitted.	SEPA 01	48	SEPA were invited to comment on the proposed layout prior to submission, but were unable to respond due to the cyber attack.
71	EIA Scope	<p>The following must be submitted in support of the application:</p> <ul style="list-style-type: none"> a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers; b) Map and assessment of impacts on GWDTEs 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; and f) Decommissioning statement. 	SEPA 02	48-49	<p>a) To be included as a Figure(s) associated with the Hydrology and Hydrogeology Chapter of the EIA Report.</p> <p>b) A Technical Appendix detailing Groundwater Dependent Terrestrial Ecosystems to be included in the EIA Report. In addition, potential impacts and principles of mitigation will be set out in the Hydrology and Hydrogeology Chapter.</p> <p>c) Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report.</p> <p>A draft PMP will also be included as a Technical Appendix to the EIA Report.</p>

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					<p>d) A Borrow Pit Report will be included as a Technical Appendix to the EIA Report.</p> <p>e) A Schedule of Mitigation Measures will be in the EIA Report.</p> <p>f) A Decommissioning Statement will be included in Description of Development Chapter of the EIA Report.</p>
72	Policy and Legislation	Policy, guidance and best practice design has moved on considerably since the previous application and it is important that any new application takes this fully into consideration at an early stage.	SEPA 03	49	The Planning Policy and Context Chapter of the EIA Report will include reference to current relevant planning policy and legislation.
73	Development Design	<p>At this stage a Proposed Development Area has been provided, rather than an indicative layout. In relation to this, SEPA provide the following early advice:</p> <ul style="list-style-type: none"> SEPA would expect a layout design which minimises the length of access track required to support it, as this is probably the most significant way environmental effects from the project in relation to SEPA's interests can be reduced; If access is being taken through the existing Achany and Rosehill wind farms then it needs to be demonstrated that the environmental benefits of doing this outweigh the additional length of track required to do so. <p>Previous laydown areas, construction compound sites and borrow pits</p>	SEPA 04	49	<p>The northern access track has been removed from the site layout.</p> <p>The EIA Report will include detail of how the Proposed Development has been designed to minimise environmental effects.</p>

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>should all be utilised and the proposed red line boundary amended to allow this;</p> <ul style="list-style-type: none"> • There needs to be clear justification for two access points; • The northern access to the proposed wind farm, which we note is the same as for the previous application, is now at the very edge of the Proposed Development Area. SEPA would expect the EIA Report to assess alternatives to this, including making use of the existing accesses from near Glencassley Castle; and • There is a clear pinch-point in the vicinity of the Allt an Rasail. The layout in this area needs to include the standard 50 m buffer to the watercourse and minimise the number of watercourse crossings required. We would encourage the developer to consider changing the site boundary in this area to ensure that required infrastructure can be sensitively located. 			
74	Peat and Carbon Rich Soils	<p>Much, if not all, of the site is on peat, and SEPA would expect the application to be supported by a full site-specific PMP. SEPA welcome the proposal for the previous peat probing work to be updated to inform the new layout. SEPA would be happy to provide further advice on this once an initial layout has been developed. SEPA also welcome the approach of avoiding deep peat.</p>	SEPA 05	49	<p>Peat probing has been carried out across the site to inform the design iteration process. Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report. A draft PMP will also be included as a Technical Appendix.</p>
75	Pre-application Advice	<p>If the 2012 habitat survey information is provided, SEPA would be happy to provide advice on whether it is considered still fit for purpose and the specific scope of any further assessment in relation to GWDTE.</p>	SEPA 06	49	<p>Habitat survey information has been updated to support this application.</p>

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
76	Development Design	To avoid doubt, SEPA would not consider an application with large search areas for potential borrow pits to be acceptable. Enough information needs to be collected at the application stage to demonstrate that any areas proposed could provide the required material without unacceptable impacts on the environment. A constraints analysis approach may be useful.	SEPA 07	49	A Borrow Pit Report will be included as a Technical Appendix to the EIA Report.
77		If there is to be battery storage, an indicative layout plan should be included showing the design and scale of the facility, including any bunding requirements. Information should be provided on the environmental risks associated with the facility.	SEPA 08	50	No battery storage is proposed.
78	EIA Scope	SEPA note the proposal to include an Outline Construction Environmental Management Plan with the submission. SEPA now advocate a more streamlined approach to such submissions and ask that they take the form of a Schedule of Mitigation (already proposed as part of the EIA Report) and a series of detailed site specific plans which show all permanent and temporary infrastructure, local sensitivities (such as GWDTE, water bodies and deep peat), and proposed mitigation measures (such as marking out buffer areas, additional drainage requirements).	SEPA 09	50	A Draft CEMP will be included as a Technical Appendix to the EIA Report.
79		SEPA agree that forestry can be scoped out of the assessment.	SEPA 10	50	Noted.
80	Site Licencing	A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from the construction site. Site design may be affected by pollution prevention requirements and SEPA strongly encourage the Applicant to engage in pre-CAR application discussions with a member of the regulatory services team.	SEPA 11	50	It is noted the Proposed Development will require a construction site licence (under CAR regulations) for the management of surface water and groundwater discharge.
81		Management of surplus peat or soils may require an exemption under the Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or	SEPA 12	50	Waste management will be addressed in the draft CEMP, to

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.			be included as a Technical Appendix to the EIA Report. It is not anticipated that any excavated waste materials would be generated during the works as all would be re-used on site.
82	EIA Scope	All maps must be based on an adequate scale with which to assess the information. All maps 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.	SEPA 13	51	All figures accompanying the EIA Report will be at appropriate map scales, allowing for information to be assessed. The noted details will be included on figures, where appropriate.
83	Development Design	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. 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.	SEPA 14	51	Existing infrastructure would be used as far as practicable. Information on cabling will be provided in Description of Development Chapter of the EIA Report
84	Hydrology and Hydrogeology	The site layout must be designed to avoid impacts on 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: <ul style="list-style-type: none"> a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50 m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on 	SEPA 15	51	The potential impacts of the Proposed Development on watercourses and the water environment will be assessed in the Hydrology and

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>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; and</p> <p>c) A detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.</p>			<p>Hydrogeology Chapter of the EIA Report.</p> <p>a) A figure displaying infrastructure overlain with all lochs and watercourses will be included in the EIA Report.</p> <p>b) A minimum 50m buffer will be maintained around natural watercourses, with the exception of watercourse crossings, and will be displayed on a Figure included in the EIA Report.</p> <p>c) Mitigation measures will be discussed in the Hydrogeology Chapter of the EIA Report.</p>
85		If water abstractions or dewatering are proposed, a table of volumes and timings groundwater abstractions and related mitigation measures must be provided.	SEPA 16	51	This information will be included in the CEMP prepared by the Applicant's appointed Principal Contractor. A Draft CEMP will be included in the EIA Report as a Technical Appendix.
85		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 Proposed Development could result in an	SEPA 17	51-52	Information on watercourse crossings will be provided in the Hydrology and Hydrogeology Chapter of the EIA Report and

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application.			associated Technical Appendices.
87	Peat and Carbon Rich Soils	The planning submission must demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO ₂ and 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.	SEPA 18	52	The Site Selection and Design Evolution Chapter of the EIA Report will detail how the Proposed Development has been designed to minimise disturbance of peat (and also the Geology and Carbon Balance Chapter). Construction methodologies and mitigation measures will be described in the PLHRA and Draft PMP which will be included in the EIA Report as Technical Appendices.
88	EIA Scope	<p>The submission must include:</p> <ul style="list-style-type: none"> A detailed map of peat depths (this must be to full depth and follow the survey requirements 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 Proposed Development avoids areas of deep peat and other sensitive receptors such as GWDTEs; and 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. 	SEPA 19	52	<p>Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report and the draft PMP, which will be included as a Technical Appendix.</p> <p>Impacts on GWDTEs will be assessed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report.</p>

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
89	Policy and Legislation	The proposal must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste, and SEPA's Developments on Peat and Off-Site uses of Waste Peat.	SEPA 20	52	The information presented in the with the Geology and Carbon Balance Chapter of the EIA Report and its associated appendices will be in accordance with the noted guidance.
90	EIA Scope	<p>The submission must include:</p> <p>a) A map demonstrating that all GWDTE are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m 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; and</p> <p>b) If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and / or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p>	SEPA 21	52-53	<p>a) A figure(s) indicating potential GWDTE areas and the noted buffers overlain with the Proposed Development infrastructure will be included in the EIA Report.</p> <p>b) A site-specific assessment of GWDTE will be included in the EIA Report as a Technical Appendix.</p>
91		<p>The submission must include:</p> <ul style="list-style-type: none"> A map demonstrating that all groundwater abstractions are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m 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- 	SEPA 22	53	<p>a) A figure(s) indicating potential GWDTE areas and the noted buffers overlain with the Proposed Development infrastructure will be included in the EIA Report.</p> <p>b) A site-specific assessment of GWDTE will be included in the</p>

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>siting. The survey needs to extend beyond the site boundary where the distances require it; and</p> <ul style="list-style-type: none"> If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and / or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all groundwater abstractions affected. 			EIA Report as a Technical Appendix.
92	Forestry	In relation to forest removal and forest waste, 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.	SEPA 23	53	No felling is proposed.
93		<p>Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a HMP to reinstate peat-forming habitats. The submission must include:</p> <ul style="list-style-type: none"> A map demarcating the areas to be subject to different felling techniques; Photography of general timber condition in each of these areas; 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; and A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a HMP. Further guidance on this is found in Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, NatureScot and FCS. 	SEPA 24	53	No felling is proposed.
94	Development Design	Scottish Planning Policy states 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	SEPA 25	53-54	A Borrow Pit Report will be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.			
95	EIA Scope	<p>A Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:</p> <ul style="list-style-type: none"> 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 m. The Applicant must 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 10 m 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) The Applicant must provide 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. 	SEPA 26	54	<ul style="list-style-type: none"> a) Maps will be included as part of the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix; b) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix; c) The suitability of borrow pits will be discussed the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix; d) A ground investigation will be undertaken post consent to inform borrow pit design. e) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix; f) This information will be detailed in the Draft CEMP,

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>Cut-off drains must be installed to maximise diversion of water from entering quarry works;</p> <p>f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions;</p> <p>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;</p> <p>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 requirements set out in Scottish Government Guidance) 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;</p> <p>i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of materials to be used; and</p> <p>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.</p>			<p>which will be included in the EIAR as a Technical Appendix;</p> <p>g) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>h) Proposed peat storage areas and dimensions will be presented in the draft PMP, which will be included in the EIA Report as a Technical Appendix; and</p> <p>i and j) Indicative borrow pit restoration profiles will be provided in the PMP, which will be included in the EIA Report as a Technical Appendix. Further details of phasing and rock processing, etc., will be provided post-consent.</p>
96		A Schedule of Mitigation supported by the aforementioned site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques and regulatory requirements. They should set out the daily responsibilities of the Environmental Clerk(s) of Works	SEPA 27	55	A Schedule of Mitigation, summarising all mitigation measures set out within the EIA Report, will be included in the EIA Report. The Hydrology and

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		(ECoWs), how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.			Hydrogeology Chapter of the EIA Report will include site-specific information relating to the water environment. Further information will also be provided in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
97	Development Design	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 on 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.	SEPA 28	55	Life extension and repowering proposals will not be included within the EIA Report. Details on decommissioning will be included in the Description of Development Chapter of the EIA Report.
98	Pollution and Waste	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.	SEPA 29	55	Waste management will be addressed in the draft CEMP, which will be included in the EIA Report as a Technical Appendix. It is not anticipated that any excavated waste materials would be generated during the

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					works as all would be re-used on site.
99	Forestry	If any tree felling is required to allow for improvements to the Achany Wind Farm access track, compensatory planting may be required as per the Scottish Government's Policy on Control of Woodland Removal.	SF 01	56	No felling is proposed.
100		Scottish Forestry agrees with the Applicant's proposal to exclude forestry from the EIA for the Proposed Development and has no further comments to make at this stage. However, Scottish Forestry would like to be included in further consultation.	SF 02	56	Noted.
101	Infrastructure	Scottish Water has no objection to the Proposed Development. The Applicant should be aware that this does not confirm that the Proposed Development can currently be serviced.	SW 01	61	Noted.
102		Scottish Water records indicate that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.	SW 02	62	Noted. A review of potential hydrological sensitivities will be included within the Hydrology and Hydrogeology Chapter of the EIA Report.
103	Infrastructure, Development Design	Scottish Water will not accept any surface water connections into their combined sewer system, except in limited exceptional circumstances for brownfield sites only. Where such a discharge is proposed, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan.	SW 03	62	Noted.
104	Infrastructure	The developer should be aware that Scottish Water requires land title to the area of land where a pumping station and / or SuDS proposed to vest in Scottish Water is constructed.	SW 04	63	Noted.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
105	Pollution and Waste	Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including vehicle, plant and equipment washing, waste and leachate management. Trade effluent must never be discharged into surface water drainage systems as they are solely for draining rainfall run off.	SW 05	63	Pollution control measures will be set out in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;
106	EIA Scope, Traffic and Transport	Transport Scotland would request that potential trunk road related environmental impacts such as driver delay, pedestrian amenity, severance, safety, etc. be considered and assessed where appropriate, i.e. where IEMA Guidelines for further assessment are breached.	TS 01	66	An assessment of impact on traffic and transport has been undertaken in line with IEMA guidelines and will be included in the Traffic and Transport Chapter of the EIA Report and supporting appendices.
107		<p>In the case of the EIA Report, the methods adopted to assess the likely traffic and transportation impacts on traffic flows and transportation infrastructure should comprise:</p> <ul style="list-style-type: none"> • Determination of the baseline traffic and transportation conditions, and the sensitivity of the site and existence of any receptors likely to be affected in proximity of the trunk road network; • Review of the development proposals to determine the predicted construction and operational requirements; and • Assessment of the significance of predicted impacts from these transport requirements, taking into account impact magnitude (before and after mitigation) and baseline environmental sensitivity. 	TS 02	66	Traffic and Transport Chapter of the EIA Report will assess the likely traffic and transport impacts of the Proposed Development, detailing the required information.
108		Where significant changes in traffic are not noted for any link, no further assessment needs to be undertaken.	TS 03	66	Significance of impacts on traffic and transport will be detailed in

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					the Traffic and Transport Chapter of the EIA Report
109		It is note that any impacts associated with the operational and decommissioning phases of the Proposed Development are to be scoped out of the EIA. Transport Scotland consider this acceptable in this instance.	TS 04	66	Noted.
110		Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided with the EIA Report that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	TS 05	66	The Traffic and Transport Chapter of the EIA Report will be supported by a Route Survey Report (presented as a Technical Appendix), which will detail the abnormal load route, swept path analysis and associated mitigation.
111	Description of Development	<p>The description of the Proposed Development set out in the EIA Report must include:</p> <ul style="list-style-type: none"> A description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases, including the requirements for borrow pits, local road improvements, infrastructural connections (i.e. connections to the 	THC 01	10	The Description of Development Chapter of the EIA Report will detail the specific elements of the Proposed Development. The assessment of the Proposed Development is undertaken throughout the EIA Report

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		<p>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;</p> <ul style="list-style-type: none"> • 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 to substances or technologies used; • An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and • The estimated cumulative impact of the project with other consented or operational developments. 			
112	Alternatives	<p>The EIA Report should outline the main development alternatives studied and an indication of the main reasons for the final project choice. This is expected to highlight the following:</p> <ul style="list-style-type: none"> • The range of technologies that may have been considered; • Locational criteria and economic parameters used in the initial site selection; • Options for access; • Design and locational options for all elements of the Proposed Development (including grid connection); and • The environmental effects of the different options examined. <p>The assessment should highlight sustainable development attributes including, for example, assessment of carbon emissions / carbon savings.</p>	THC 02	11	The Site Selection and Design Evolution Chapter of the EIA Report will detail the alternatives studied by the Applicant.
113	Assessment	<p>The EIA Report must provide a description of the aspects of the environment likely to be significantly affected. The Applicant is encouraged to use their understanding of other wind developments in the area in assessing the Proposed Development to ensure that information provided is relevant and robustly grounded.</p>	THC 03	11	The assessment of the Proposed Development will be undertaken throughout the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
114	Land Use and Policy	The EIA Report should recognise the existing land uses affected by the Proposed Development having regard for THC's Development Plan and supplementary guidance, particularly the Onshore Wind Energy Supplementary Guidance. 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. It is expected that a Planning Statement will also support an application to explore compliance with the Development Plan and consider Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development.	THC 04	11	These policy documents will be referenced within the Planning Policy and Context Chapter of the EIA Report and the Planning Statement, which will accompany the EIA Report.
115	Landscape and Visual	THC expects the EIA Report to consider the landscape and visual impact of the Proposed Development.	THC 05	11	Landscape and visual impacts will be considered in the Landscape and Visual Chapter of the EIA Report.
116		While not mutually exclusive, landscape and visual 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 35 mm format full frame sensor camera, not an equivalent. The focal lengths required are 50 mm and 75 mm. These images should form part of the EIA Report and not be separate from it. Photomontages should follow the Council's Visualisation Standards.	THC 06	11	Visualisations produced to the THC 'Visualisation Standards for Wind Energy Development' (2016) and will be included as Volume 3B of the EIA Report and images for the panoramic viewer will be supplied. Technical details of visualisation will be included in a 'Technical Methodologies for Visual Representations' Technical Appendix.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
117	Visualisations	Separate volumes of visualisations should be prepared to both Highland Council (THC) Standards and NatureScot (previously SNH) guidance. These should be provided in hard copy. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in view. THC are happy to provide advice on this matter going forward.	THC 07	11	This will be undertaken. Volume 3A of the EIA Report will contain visualisations prepared to NatureScot Guidance. Volume 3B of the EIA Report will contain visualisations prepared to THC guidance.
118		All existing turbines should be re-rendered in visualisations even if they appear to be facing the viewer in the photograph to ensure consistency.	THC 08	11-12	This will be undertaken and detailed in the EIA Report in a Technical Appendix titled 'Technical Methodologies for Visual Representations' Technical Appendix.
119	EIA Scope, LVIA	The LVIA should include the expected impact of on-site borrow pits and access roads.	THC 09	12	This will be assessed in the Landscape and Visual Chapter.
120	Cumulative Study Area	The cumulative assessment study area should be the same as the visual assessment; however, if the turbines proposed are greater than 150 m, THC would encourage an increase to the study area to a minimum of 45 km.	THC 10	12	Agreement on cumulative assessment study areas has occurred in consultation with THC and will be set out in the Landscape and Visual Chapter of the EIA Report.
121		To identify other schemes within the study area, the Applicant should use THC's Interactive Wind Turbine Map. Consultation should also be undertaken with ECU to understand which schemes are currently at scoping stage.	THC 11	12	The Interactive Wind Turbine Map has been used to identify cumulative sites. The final list of cumulative sites to be included in the assessment has been

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					agreed with THC and NatureScot.
122	Viewpoints	Viewpoints for the assessment of effects must be agreed in advance with THC once the size and scale of the turbines have been established.	THC 12	12	The final list of VPs has been agreed with THC and NatureScot.
123		Viewpoints should correspond with the viewpoints used for existing wind energy schemes in the area and those currently under consideration.	THC 13	12	This has been considered in the selection of viewpoints. The final list of VPs has been agreed with THC and NatureScot.
124		Community councils may request additional viewpoints and any pre-application discussions with the local community should take this into account.	THC 14	12	The final list of VPs has been agreed with THC and NatureScot. Recommendations for viewpoint locations noted during the scoping (and scoping refresh) process have been taken into account. There has not been any known VP requests from community councils.
125		The final list of viewpoints should be agreed with the planning authority.	THC 15	12	The final list of VPs has been agreed with THC and NatureScot.
126		The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information.	THC 16	12	This will be set out in the Landscape and Visual Chapter and associated Technical Appendices.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
127	Study Area and Wirelines	If the turbines proposed are greater than 150 m THC would encourage the study area to be a minimum of 45 km. THC are content with a 35 km study area for turbines less than 149.9 m in height. If the blade tip increases THC would review this position. Given the size of turbines, THC would expect a detailed assessment of effects for the whole study area.	THC 17	12	Turbines are proposed up to 149.9m. The Study Area is 40 km in line with current best practice guidance (Visual Representation of Wind Farms, v2.2 (SNH / NatureScot, 2017) a detailed study area of 20 km is proposed for assessment of residential areas and landscape character types.
128	Recreational Routes	The assessment of impact on recreational routes should include all core paths, the national cycle network, long distance trails and the North Coast 500.	THC 18	12	This will be undertaken within the Landscape and Visual Chapter of the EIA Report.
129	Cumulative	The study area for cumulative impacts should extend to a minimum of 35 km.	THC 19	12-13	Agreement on cumulative assessment study areas of 40km has occurred in consultation with THC and will be set out in the Landscape and Visual Chapter of the EIA Report.
130		Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation with the Panoramic Digital Viewer deployed by THC.	THC 20	13	Images for the panoramic viewer have been supplied.
131	Landscape	The SNH 2019 landscape character assessment should be used.	THC 21	13	The NatureScot 2019 Landscape Character Assessment will be referred to in

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					the Landscape and Visual Chapter of the EIA Report.
132		An assessment on Wild Land Areas should be included within the EIA Report given the proximity to a number of wild land areas and theoretical visibility within these areas. SNH will provide further advice.	THC 22	13	An assessment on Wild Land Areas 34 and 37 has been undertaken in agreement with NatureScot and will be provided in the Landscape and Visual Chapter of the EIA Report and associated appendices.
133		The EIA Report should include an assessment of the proposal against the criterion set out in THC's Onshore Wind Energy Supplementary Guidance to be included in the LVIA.	THC 23	13	An assessment of the Proposed Development against relevant OWESG criterion will be provided in the EIA Report as a Technical Appendix titled 'Appraisal of The Highland Council's Criteria for the Consideration of Onshore Wind Proposals.'
134		The landscape assessment should assess the impacts on any landscapes designated at a national and local scale including the impact on Special Landscape Areas (SLA) using the SLA citations available on the Council's website.	THC 24	13	Landscape designations will be assessed in the Landscape and Visual Chapter of the EIA Report.
135	Aviation Lighting	Due to the scale of turbines being proposed, aviation lighting may be required which should be assessed. A Lighting Impact Assessment will be required and should be considered from all viewpoints and form part of the LVIA chapter and	THC 25	13	The selection of a turbine with tip height below 150m removes the requirement for visible aviation lighting.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		considered in the wild land assessment. Further advice on aviation lighting is available from SNH.			
136	Baseline Ecology Surveys	The EIA Report should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians etc.) and the habitats present on the site. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog in the context of both biodiversity conservation and risk of peat slide. The EIA Report should address whether or not the Proposed Development could assist or impede delivery of elements of relevant Biodiversity Action Plans.	THC 26	13	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
137		The EIA Report should provide a baseline survey of plants (and fungi) and trees present on the site.	THC 27	13	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
138	Designated ecological sites	The EIA Report should address the likely impacts on the nature conservation interested of all designated sites in the vicinity of the site and provide proposals for any mitigation to reduce any impacts to not significant.	THC 28	13	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
139	Wild Deer	If wild deer are present or use the site, an assessment of the potential impact on deer will be required.	THC 29	13	An assessment of the potential impact on deer as a result of the Proposed Development will be included in the Ecology Chapter of the EIA Report. A Deer Management Plan will also be prepared and will be included as a Technical Appendix.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
	Aquatic Interests	The EIA Report should address the aquatic interests within local watercourses or downstream, that may be impacted by the Proposed Development. The EIA Report should evidence consultation input from local fishery boards where relevant.	THC 30	13-14	Potential effects on aquatic interests will be addressed in the Ecology Chapter of the EIA Report.
140	GWDTE	The EIA Report should include an assessment on Ground Water Dependent Terrestrial Ecosystems.	THC 31	14	Impacts on GWDTEs will be assessed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report.
141	Ornithology	The presence of protected species such as Schedule 1 or European Protected Species must be considered as part of the planning application, not at a later stage.	THC 32	14	An assessment of potential effects on such species will be included in the Ornithology Chapter of the EIA Report and will be informed by recent survey effort.
142		An assessment of the impacts to birds through collision, disturbance and displacement will be required for both the development site and cumulatively with other proposals. The EIA Report should clearly set out the survey methods.	THC 33	14	An assessment of the potential impact of the Proposed Development on birds will be provided in the Ornithology Chapter of the EIA Report.
143	Survey Methodology, Noise	An operational noise assessment should be carried out in accordance with ETSI-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics.	THC 34	14	The assessment of noise has been carried out in accordance with the stated guidance and will be described in the Noise Chapter of the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
144	Operational Noise	The target noise levels are either a simplified standard of 35 dB LA90 at wind speeds up to 10 m/s or a composite standard of 35 dB LA90 (daytime) and 38 dB LA90 (night time) or up to 5 dB above background noise levels up to 12 m/s. The night time lower limit of 43 dB LA90 as suggested in ETSU is not acceptable in many areas of the Highlands due to the very low background levels. These limits would apply to cumulative noise levels from more than one development.	THC 35	14	The Noise Chapter of the EIA Report will include the required details.
145	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. The noise assessment must take into account predicted and consented levels from such developments. A map should be included showing all wind farm development which may have a cumulative effect and all noise sensitive properties including any for which financial involvement relaxation is being claimed.	THC 36	14	The Noise Chapter of the EIA Report will include the required details.
146		<p>The assessment should include a table of figures which includes:</p> <ul style="list-style-type: none"> The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12 m/s. The maximum levels based on consented limits for each existing or consented scheme at each NSL. 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. 	THC 37	14-15	The Noise Chapter of the EIA Report will include the required details.
147	Background Noise Measurements	Background Noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. Monitoring locations should be agreed with the Councils Environmental Health Officer. Sites should avoid other noise sources.	THC 38	15	The Noise Chapter of the EIA Report will include the required details. Monitoring locations

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					have been agreed with the THC EHO.
148	Construction Noise	Where there is potential for disturbance from construction noise, the application will need to include a noise assessment. Construction noise assessment 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 mitigation measures should be provided.	THC 39	15	The Noise Chapter of the EIA Report will include the required details.
149		Regardless of whether a construction noise assessment is required, the best practicable means to reduce the impact of noise from construction activities should be employed.	THC 40	15	The Noise Chapter of the EIA Report will include the required details.
150	Noise Exposure	When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time.	THC 41	16	An assessment of noise, including cumulative, will be included in the Noise Chapter of the EIA Report.
151	Cultural Heritage	All designated sites which may be affected by the Proposed Development either directly or indirectly should be identified.	THC 42	16	Potential for direct and indirect effects on cultural heritage assets will be addressed in the Cultural Heritage Chapter of the EIA Report.
152		An assessment should contain full appreciation of the setting of historic environment assets and the likely impact on their settings. If the assessment finds that significant impacts are likely, it would be helpful for appropriate visualisations to provided illustrating views both from the asset towards the Proposed Development and views towards the asset with the Proposed Development in the background.	THC 43	16	The setting of historic assets will be assessed in the Cultural Heritage Chapter of the EIA Report. A visualisation from Dail Broch SM will also be provided.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
153		There are a large number of heritage assets in the vicinity of the Proposed Development; these need to be assessed. HES have provided detailed advice on potential setting impacts.	THC 44	16	Potential for direct and indirect effects on cultural heritage assets will be addressed in the Cultural Heritage Chapter of the EIA Report...
154		The Applicant should liaise with the Council's Historic Environment Team on the scope of archaeological assessments.	THC 45	16	The scope of the cultural heritage assessment will be provided in the Cultural Heritage Chapter of the EIA Report.
155	Water Environment	The EIA Report should address the nature of the hydrology and hydrogeology of the site and potential impacts on watercourses, water supplies (including PWS), water quality, and water quantity and on aquatic flora and fauna. Measures to prevent affects will be required along with monitoring proposals and contingency plans.	THC 46	16	This will be addressed in the Hydrology and Hydrogeology Chapter of the EIA Report and accompanying appendices.
156	Watercourse Crossings	Schemes should be designed to avoid crossing watercourses and to bridge watercourses where this cannot be avoided. The EIA Report should identify all water crossings and include a systematic table of watercourse crossings or channelising with detailed justification for the need and design to minimise impact. The table should be accompanied by photography of each watercourse affected and dimensions.	THC 47	16-17	Watercourse crossing information will be provided in Watercourse Crossings Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report
157	Abstractions	The EIA Report should identify whether a public or private source would be utilised for any abstraction of water supplies. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	THC 48	17	Potential impacts on public and private water supplies will be addressed in a Private Water Supplies Technical Appendix, associated with the Hydrology

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					and Hydrogeology Chapter of the EIA Report.
158	PWS	Any private water supplies should be investigated including pipework, which may be affected by the Proposed Development. Measures proposed to prevent contamination or physical disruption should be provided. THC has some information on known supplies but it is not definitive. An on-site survey will be required.	THC 49	17	An assessment of the Proposed Development on private water supplies will be undertaken and will be noted in chapter and a Private Water Supplies Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report.
159	Peat	The EIA Report should consider the risks of engineering instability relating to the presence to peat on the site.	THC 50	17	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report
		A comprehensive peat slide risk assessment should be carried out in accordance with the Scottish Government Best Practice Guide for Developers. This should include a detailed map of peat depth and evidence that the scheme minimises impact on deep peat. The EIA Report should include site specific principles on which construction methods would be developed for engineering works on peat.	THC 51	17	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report.
160		The EIA Report should include a full assessment on the impact of the Proposed Development on peat. This must include peat probing for all areas where Proposed Development is proposed including areas subject to micro-siting limits.	THC 52	17	Peat depth probing has been carried out across the site to inform the layout and assessment of effects. This will be detailed in the Geology and

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					Carbon Balance Chapter of the EIA Report and associated Technical Appendices.
161	Carbon Balance	Carbon balance calculations should be undertaken and included in the EIA Report with a summary of the results focussing on the carbon payback period for the wind farm.	THC 53	17	A carbon balance calculation will be undertaken and will be reported in a Technical Appendix associated with the Geology and Carbon Balance Chapter of the EIA Report.
162	Geology and Borrow Pits	The EIA Report should describe the significant effects of the Proposed Development on local geology. Proposals should demonstrate construction practices that minimise use of raw materials and maximise use of secondary aggregates and recycled or renewable products. Where borrow pits are proposed, the EIA Report should include information on the location, size and nature and on the depth of the borrow pit to the floor and reinstated profile.	THC 54	17	Potential effects on geology will be provided in the will be included in the Geology and Carbon Balance Chapter of the EIA Report. A Borrow Pit Report will also be included in the EIA Report as a Technical Appendix.
163	Traffic and Transport	A Transport Assessment or section on traffic and transportation will be required in the EIA Report. Where necessary, measures to mitigate impact of the Proposed Development on the road network should be set out.	THC 55	17-18, 21	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include the required details.
164		The chosen Port of Entry and preferred route for the AIL shall be clearly demonstrated and include details of alternative routes considered. The proposed route for general construction traffic should also be identified and reviewed within the EIA Report.	THC 56	21	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment and a Route

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
					Survey Report (presented as Technical Appendices) which will include the required details.
165		<p>Matters to be covered in the transport assessment include:</p> <ul style="list-style-type: none"> Identify all public roads affected by the Proposed Development and routes used by suppliers; Establish current condition of the roads and will involve and engineering appraisal of the routes; Traffic resulting from the Proposed Development; Current traffic flows; Impacts of proposed traffic on roads, users, communities and a swept path analysis; Cumulative impacts with other developments; and Proposed mitigation measures to address impacts 	THC 57	18-19	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include the required details.
166		The EIA Report should consider implications on the Trunk Road network.	THC 58	19	The Traffic and Transport Chapter of the EIA Report will consider implications on the Trunk Road network.
167		The EIA Report should include a framework traffic management plan aimed at minimising impact of the construction traffic.	THC 59	21	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include a Framework Construction Traffic Management Plan.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
168	Socio-economic, Recreation and Tourism	Socio-economic, recreation and tourism should have its own chapter in the EIA Report. The EIA Report should estimate who may be affected by the Proposed Development and should include relevant economic information connected with the project and set out the impact on the regional and local economy, not just national.	THC 60	19	A Socio-economic, Recreation and Tourism Chapter will be included in the EIA Report, which will include the required details.
169	Recreation	A plan detailing the following should be submitted as part of the EIA Report: <ul style="list-style-type: none"> Existing public non-motorised public access footpaths, bridleways, cycleways on the site and proposed access from the road infrastructure Proposed public access provision both during construction and after completion of the Proposed Development, including links to existing path networks and to the surrounding areas, and access points to water; and Impacts of the Proposed Development on the core paths and proposed mitigation, if any. 	THC 61	19	A Draft Outdoor Access Management Plan, which will include the required details, will be prepared and provided as a Technical Appendix to the EIA Report.
170	Access Management Plan	The application should be accompanied by an Access Management Plan.	THC 62	19	A Draft Outdoor Access Management Plan will be prepared and provided as a Technical Appendix to the EIA Report.
171	Existing Infrastructure	The EIA Report should consider impacts on existing infrastructure; TV radio, telecommunication links, aviation, radar, MOD safeguards. Any consultations with relevant authorities should be set out through the provision of written evidence.	THC 63	19	This will be considered in the EIA Report.
172		There should be continued dialogue with HIAL over the impact on radar at airports in the area.	THC 64	19	Consultation responses from HIAL and potential effects on aviation will be provided in the Aviation Chapter of the EIA Report.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
173		If there are no effects on communication links this should still be explained in the EIA Report.	THC 65	19-20	Noted.
174	Shadow Flicker	If there are no properties within 11 rotor diameters, shadow flicker will not require detailed assessment but should still be addressed in the EIA Report.	THC 66	20	Noted. Shadow flicker will be scoped out of the EIA Report.
175	Trees and Forestry	If any areas of woodland likely to be affected by the Proposed Development (including its access) the Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIA Report.	THC 67	20	No felling is proposed.
176		The EIA Report should indicate all areas of woodland / trees that will be felled to accommodate the Proposed Development. Compensatory planting is an expectation for any felling.	THC 68	20	No felling is proposed.
177	Local Environment	Existing air quality and general qualities of the local environment including background noise, sunlight and prevailing wind should be considered in the EIA Report. Expected impacts of any development can be founded from this base data.	THC 69	20	Local environmental factors will be considered throughout the EIA Report.
178	Dust	Depending on the proximity of working areas to house, the Applicant may be required to submit a scheme for the suppression of dust during construction.	THC 70	20	This information will be provided in Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
179	Climate	The EIA Report 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.	THC 71		This will be considered in the EIA Report.
180	CEMD	An outline CEMD should be included with the application.	THC 72	20	This information will be provided in Draft CEMP, which will be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
181	Significant Effects	The EIA Report needs to describe the likely significant effects of the Proposed Development on the environment; direct and indirect effects, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative, resulting from the existence of the Proposed Development; use of natural resources and emission of pollutants	THC 73	20-21	The assessment of likely significant environmental effects will be undertaken throughout the technical chapters of the EIA Report.
182	Mitigation	A description of the measures envisaged to prevent, reduce and where possible offset significant adverse impacts on the environment must be set out in the EIA Report. A clear summary table of all mitigation measures associated with the Proposed Development should be provided and entitled draft 'Schedule of Mitigation'. It should be clear in the EIA Report exactly which groups are being involved in implementing mitigation.	THC 75	21	Mitigation measures will be identified within each Technical Chapter. A Schedule of Mitigation Measures will be included in the EIA Report.
183	Tourism	It is suggested that full consideration be given to the Scottish Government's 2008 research on the impact of wind farms on tourism. The report highlights a request, as part of the planning process, to provide a tourism impact statement as part of the EIA.	VS 01	69	Tourism and recreation effects will be considered in the Socio-economics, Recreation and Tourism Chapter of the EIA Report.
184		VisitScotland strongly recommend any potential detrimental impact of the Proposed Development on tourism – whether visually, environmentally and economically – be identified and considered in full.	VS 02	69	Tourism and recreation effects will be considered in the Socio-economics, Recreation and Tourism Chapter of the EIA Report.
185		It is recommended that an independent tourism assessment should be carried out. This should be geographically sensitive and consider the potential impact on any tourism offerings in the vicinity of the Proposed Development. The impact of	VS 03	69	Tourism and recreation effects will be considered in the Socio-economics, Recreation and Tourism and recreation effects

No.	Subject	Task	Consultee	2019 Scoping Opinion Page Ref.	Comments
		any perceived proliferation of developments may have on the local tourism industry, and the local economy, should also be considered.			will be considered in the Socio-economics, Recreation and Tourism Chapter of the EIA Report.

Appendix 2: 2020 Scoping Matrix

Abbreviations

DIO	Defence Infrastructure Organisation
HES	Historic Environment Scotland
HAL	Highlands and Islands Airport
MS	Mountaineering Scotland
NATS	NATS Safeguarding
NS	NatureScot
RSPB	Royal Society for the Protection of Birds
SEPA	Scottish Environmental Protection Agency
SF	Scottish Forestry
TS	Transport Scotland
THC	The Highland Council

No.	Subject	Task	Consultee	Comments
1	Aviation Safeguarding	The proposed development will occupy Tactical Training Area 14T (TTA 14T) in which military fixed wing aircraft can engage in operational low flying training down to 45.7m above terrain features. The Proposed Development will cause a potential obstruction hazard to these military low flying training activities. To address this impact, it would be necessary for the Proposed Development to be fitted with aviation safety lighting. Therefore, the MOD will request that the perimeter turbines be fitted 25 candela omni-directional red lighting or Infrared COMBI lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.	DIO 01	Potential effects of the Proposed Development on aviation safeguarding will be assessed within the Aviation Chapter of the EIA Report. It is acknowledged that a suitable aviation lighting scheme would still require to be agreed with the Ministry of Defence (MOD). It is anticipated that this would be infrared lighting.

No.	Subject	Task	Consultee	Comments
2		MOD Safeguarding wishes to be consulted and notified about the progression of this proposal and any subsequent application(s) that may be submitted relating to it to verify that it will not adversely affect defence interests	DIO 02	Noted. The Applicant will consult and notify MOD Safeguarding about the progression of this proposal and any subsequent application(s) that may be submitted relating to it.
3	Cultural Heritage	Table 1 of the Scoping Refresh document identifies that there are no anticipated changes in scope for the cultural heritage chapter from the 2019 scoping opinion and the previous HES advice therefore still stands.	HES01	Noted. Refer to HES response in 2019 Scoping Opinion (See Appendix 1).
4		HES can confirm there are no scheduled monuments, category A-listed buildings, inventory gardens and designed landscape or inventory battlefield within the development site. There are some heritage assets within the surrounding area including one scheduled monument: Dail Langwell broch located 2km south-west of the site. It is possible the Proposed Development would be visible from the broch, or important views towards it, and have an impact on its setting. Further consideration should be given to assessing impacts in the EIA. Visualisations are expected that assess the impact of the turbines on the setting of the broch.	HES 02	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage Chapter of the EIA Report. A visualisation from Dail Langwell Broch will also been provided.
5		Where significant impacts are identified they should be reduced or avoided by amendments to the design.	HES 03	Potential impacts on cultural heritage assets will be considered in the Cultural Heritage Chapter of the EIA Report.
6	EIA Policy	On 1 May 2019, HES adopted new Historic Environment Policy for Scotland.	HES 04	Noted.
7	Aviation Safeguarding	HIAL note that the layout is not fixed and further refinements and amendments may result. It is considered that the Proposed Development could accommodate 20 turbines with a tip height of approximately 149.9m. HIAL's calculations show that this	HIAL01	Potential effects of the Proposed Development on aviation safeguarding will be assessed within the Aviation Chapter of the EIA Report.

No.	Subject	Task	Consultee	Comments
		development would be unlikely to impact the safeguarding criteria for Inverness Airport. HIAL would require exact turbine heights and locations to provide further comment.		
8	Landscape and Visual Amenity	Mountaineering Scotland note the improved clarity on the Proposed Development and welcome the reinstatement of Carn Chuinneag as a viewpoint.	MS 01	Noted
9	Aviation Safeguarding	The Proposed Development has been examined from a technical safeguarding aspect and does not conflict with NATS' safeguarding criteria. NATS has no safeguarding objection to the Proposed Development. If the Proposed Development is revised, amended or a further application for approval made, NATS must be further consulted.	NATS 01	Potential effects of the Proposed Development on aviation safeguarding will be assessed within the Aviation Chapter of the EIA Report.
10	Wild Lands Areas	NatureScot note that their comments provided within the 2019 Scoping Opinion are still valid but they have provided additional comments and points of clarification since the number and dimensions of turbines have been revised. NatureScot note that this is the first time they have seen a turbine layout for the Proposed Development.	NS 01	Refer to NatureScot's response in 2019 Scoping Opinion (See Appendix 1). Additional NatureScot comments and points of clarification are addressed within this TA.
11		As the Proposed Development is fully located within the Reay-Cassley WLA, it is highly likely to result in significant adverse effects on the qualities of this WLA and therefore NatureScot may object. Due to the location, form and size, NatureScot expect it to be very difficult to accommodate a wind farm on this site as even a small number of commercial turbines in this location would be likely to result in significant effects on wild land qualities.	NS 02	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Appendices).

No.	Subject	Task	Consultee	Comments
12		NatureScot recommend that the Applicant undertake an assessment of effects on wild land using the new Wild Land Technical Guidance (Sept 2020). As there are likely to be significant effects from the Proposed Development, NatureScot agree that the Wild Land Assessment should include both Wild Land Areas: Reay – Cassley WLA and Foinaven – Ben Hee WLA.	NS 03	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). The Wild Land Assessment will be completed in accordance with NatureScot's Wild Land Assessment Guidance: 'Assessing Impacts on Wild Land Areas – Technical Guidance' (NatureScot, 2020). Confirmation of the approach has been discussed with NatureScot.
13		The viewpoints that have been selected within the Reay-Cassley WLA include, VP 23 (Meall an Aonaich) and VP 10 (Ben More Assynt), are both elevated locations. NatureScot notes that whilst these viewpoints often form the best locations from which to assess visual effects, this is not necessarily the case when considering effects on WLA qualities. Therefore, NatureScot suggest that the developer identifies additional assessment locations where the wild land qualities are well expressed and the influence of other development, such as wind farms, in the baseline is not so apparent. These do not need to be landscape and visual viewpoints, as they primarily will inform the wild land assessment. NatureScot would be eager to advise further on these locations if provided with wirelines and a more detailed ZTV.	NS 04	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). The final list of VPs has been agreed with THC and NatureScot.
14		NatureScot note that not all the wild land qualities for the Reay-Cassley WLA may be required for detailed assessment due to their individual susceptibility to the proposal. NatureScot would be happy to comment on a draft list of qualities that will require a detailed assessment and are particularly keen to see how the LVIA will inform	NS 05	A Wild Land Assessment will be included for both WLA 34 (Reay-Cassley) and WLA 37 (Foinaven-Ben Hee) within the Landscape and Visual Chapter of the EIA Report (and associated Technical Appendices). The Wild Land Assessment will be completed in accordance with NatureScot's Wild Land Assessment Guidance: 'Assessing

No.	Subject	Task	Consultee	Comments
		modifications and refinements to the detailed design and identify any further appropriate mitigation measures to reduce potential effects.		Impacts on Wild Land Areas – Technical Guidance’ (NatureScot, 2020). Confirmation of the approach has been discussed with NatureScot.
15		NatureScot welcome the confirmation that aviation lighting will not be required due to the turbines being confirmed at <150m in height.	NS 06	Noted.
16	Protected Areas	The Proposed Development abuts a component part of the Caithness & Sutherland Peatlands Special Protection Area (SPA), Ramsar Site and Special Area of Conservation (SAC) protected for its upland birds, peatland habitats and otter. In addition, this proposal is hydrologically connected to the River Oykel SAC protected for its Atlantic salmon and freshwater pearl mussel.	NS 07	Potential impacts on these designated sites and their qualifying features, including through hydrological connectivity, will be addressed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report and their associated Technical Appendices.
17		The layout of the Proposed Development shows turbines in very close proximity to the Caithness & Sutherland Peatlands SAC (Grudie Peatlands SSSI) and close to watercourses which eventually flow into the River Oykel SAC. A Peat Slide Risk Assessment should be undertaken to inform the potential impacts upon all of these Protected Areas, and mitigation identified to reduce risk (e.g. turbine relocation or removal). Other assessments will also be required, as outlined in our previous scoping response.	NS 08	Potential impacts on these designated sites and their qualifying features, including through hydrological connectivity, will be addressed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report and their associated Technical Appendices. A Peat Landslide Hazard and Risk Assessment (PLHRA) will be included in the EIAR as a Technical Appendix. Other assessments outlined in the 2019 Scoping Opinion, including an Outline Habitat Management Plan (HMP) and a Deer Management Plan (DMP), will also been included in the EIA Report as Technical Appendices.
18	EIA Policy	NatureScot have updated our helpful pre-application/scoping advice (Sept 2020) which can be found on the NatureScot website.	NS 09	Noted

No.	Subject	Task	Consultee	Comments
19	Ornithology	RSPB Scotland's previous advice from the 2019 Scoping Opinion (dated 24 September 2019) is still relevant with regards to the scoping for the revised scheme.	RSPB 01	Refer to RSPB Scotland's response in 2019 Scoping Opinion (See Appendix 1). Additional RSPB Scotland comments and points of clarification are addressed within this TA.
20		White-tailed eagle breeding data within 6km should be requested from Highland Raptor Study Group (HRSG).	RSPB 02	Data from HRSG will be used in the ornithology assessment presented in the Ornithology Chapter of the EIA Report and its associated Technical Appendices.
21		Figure 6 in the 2019 Scoping Report and Figure 3 in the 2020 Scoping Report show that that vantage points 3, 5 and 7 do not cover the full 500m envelope around the proposed turbine locations, and they are within close proximity to some turbine locations. This will need to be justified in the EIA Report.	RSPB 03	Justification for the location and extent of vantage points 3, 5 and 7 will be provided in the Ornithology Chapter of the EIA Report.
22		Due to the increasing number of wind developments in this area of the Highlands and adjacent to the Caithness and Sutherland Peatlands SPA, a robust cumulative assessment on the SPA and Natural Heritage Zones (NHZ) populations of impacted bird species should be undertaken with regards to collision risk, displacement and barrier effects. The assessment should include other proposed, consented and operational developments and the various grid connection projects associated with these wind developments.	RSPB 04	A cumulative assessment will be included in the in the Ornithology Chapter of the EIA Report.
23	Forestry	The proposed updated scoping site layout and the Applicant's 2020 Scoping Report states that the Proposed Development is to be accessed via existing Achany Wind Farm access track. Any potential impact on forestry is therefore unlikely, hence previous SF's 219 Scoping Opinion (dated 02 September 2019).	SF 01	Refer to Scottish Forestry's 2019 Scoping Opinion (See Appendix 1)
24	Consultation	Prior to the formal submission of the application SEPA strongly encourage the Applicant to engage in further consultation. As a	SEPA 01	Further consultation with SEPA has been sought, providing habitat and peat depth data as requested. However, due to the SEPA cyber attack in December 2020, SEPA have been unable to respond to the consultation.

No.	Subject	Task	Consultee	Comments
		<p>minimum, the following three layout plans showing all permanent and temporary works should be provided:</p> <ul style="list-style-type: none"> • 50 m buffers to watercourses; • NVC survey results; and • all peat probing results (showing the location of individual peat probes, colour coded for depth). <p>SEPA would also provide advice on any Groundwater Dependent Terrestrial Ecosystem (GWDTE) assessment or other work on peat such as the Peat Management Plan (PMP).</p>		
25	Site Layout	SEPA welcome that the overall area for the Proposed Development is now smaller and with only one access point.	SEPA 02	Noted
26		SEPA welcome that the Proposed Development intends to make use of existing infrastructure associated with the Achany Wind Farm, including tracks, borrow pit reuse and potential for use of operational buildings and storage areas. This approach will minimise impacts to undisturbed habitats.	SEPA 03	Noted
27		SEPA consider that the two most northerly proposed borrow pits should be accessed via the proposed permanent track, rather than including new lengths of temporary track and the track loop further south should be removed from the design. The layout should be designed to minimise the extent of new works on previously undisturbed ground and our preference is for turbines, and the associated infrastructure, to be situated on the main track where feasible without the need for excessive additional loops and spurs	SEPA 04	The design changes proposed by SEPA have been considered in the design evolution of the Proposed Development and will be outlined in the EIA Report.
28	Survey Work	SEPA note that Phase 1 habitats and NVC surveys and Stage 1 peat probing have been undertaken and that Phase 2 peat probing is underway to refine the layout. It is stated that these will be submitted	SEPA 05	Further consultation with SEPA has been sought, providing habitat and peat depth data as requested. However, due to

No.	Subject	Task	Consultee	Comments
		to SEPA during further pre-application discussions. We encourage these to be submitted as soon as possible to help inform the best environmental option for the site layout.		the SEPA cyber attack in December 2020, SEPA have been unable to respond to the consultation.
29	Regulatory Requirements	Details of regulatory requirements and good practice advice for the Applicant can be found on the Regulations section of the SEPA website. A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from the construction site. Site design may be affected by pollution prevention requirements and SEPA strongly encourage the Applicant to engage in pre-CAR application discussions with a member of the regulatory services team in the local SEPA office.	SEPA 06	It is noted the Proposed Development will require a construction site licence (under CAR regulations) for the management of surface water and groundwater discharge. The Applicant will engage in pre-CAR application discussions with a member of the regulatory services team in the local SEPA office.
30		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. The Applicant should consider if any other environmental licences may be required for any installations or processes.	SEPA 07	Waste management will be addressed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix. It is not anticipated that any excavated waste materials would be generated during the works as all would be re-used on site. Where other licences are required, these would be sought from the appropriate authority.
31	EIA Scope	All maps must be based on an adequate scale with which to assess the information. All maps 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.	SEPA 08	All figures accompanying the EIA Report will use appropriate map scales allowing for information to be assessed. The noted details will be included on figures, where appropriate.
32	Development Design	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. Cabling must be laid in ground already disturbed, such as verges. A comparison of the	SEPA 09	Existing infrastructure would be used as far as practicable. Information on cabling will be provided in Description of Development Chapter of the EIA Report

No.	Subject	Task	Consultee	Comments
		environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.		
33	Hydrology and Hydrogeology	<p>The site layout must be designed to avoid impacts on 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:</p> <ul style="list-style-type: none"> a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50 m 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; and c) A detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. 	SEPA 10	<p>The potential impacts of the Proposed Development on watercourses and the water environment will be assessed in the Hydrology and Hydrogeology Chapter of the EIA Report.</p> <ul style="list-style-type: none"> a) A figure displaying infrastructure overlain with all lochs and watercourses will be included in the EIA Report. b) A minimum 50m buffer will be maintained around natural watercourses, with the exception of watercourse crossings, and will be displayed on a Figure included in the EIA Report. C) Mitigation measures will be discussed in the Hydrogeology Chapter of the EIA Report.
34		If water abstractions or dewatering are proposed, a table of volumes and timings groundwater abstractions and related mitigation measures must be provided.	SEPA 11	This information will be included in the CEMP prepared by the Applicant's appointed Principal Contractor. A Draft CEMP will be included in the EIA Report as a Technical Appendix.
35		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 Proposed 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.	SEPA 12	Information on Detailed design of watercourse crossings will be provided in the Hydrology and Hydrogeology Chapter of the EIA Report and associated Technical Appendices.
36	Peat and Carbon Rich Soils	The planning submission must demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO ₂ and outline the preventative / mitigation measures to avoid	SEPA 13	The Site Selection and Design Evolution Chapter of the EIA Report will detail how the Proposed Development has been designed to minimise disturbance of peat (and also

No.	Subject	Task	Consultee	Comments
		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.		the Geology and Carbon Balance Chapter). Construction methodologies and mitigation measures will be described in the PLHRA and Draft PMP which will be included in the EIA Report as Technical Appendices.
37	EIA Scope	<p>The submission must include:</p> <ul style="list-style-type: none"> a) A detailed map of peat depths (this must be to full depth and follow the survey requirements 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 GWDTEs; and 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. 	SEPA 14	<p>a) Peat depths will be indicated on Figure(s) associated with the Geology and Carbon Balance Chapter of the EIA Report and the draft PMP, which will be included as a Technical Appendix.</p> <p>b) Impacts on GWDTEs will be assessed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report.</p>
38	Policy and Legislation	The proposal must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste, and SEPA's Developments on Peat and Off-Site uses of Waste Peat.	SEPA 15	The information presented in the with the Geology and Carbon Balance Chapter of the EIA Report and its associated appendices will be in accordance with the noted guidance.
39	Peat and Carbon Rich Soils	Dependent upon the volumes of peat likely to be encountered and the scale of the Proposed Development, the Applicant must consider whether a full Peat Management Plan is required or whether the above information would be best submitted as part of the schedule of mitigation.	SEPA 16	A draft PMP will be included in the EIA Report as a Technical Appendix. A full PMP will be prepared by the Applicant's appointed Principal Contractor prior to construction.

No.	Subject	Task	Consultee	Comments
40	Peat and Carbon Rich Soils	Note that SEPA do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. SEPA advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when such assessments are considered.	SEPA 17	The carbon balance calculation will be undertaken and will be reported in a Technical Appendix to the EIA Report.
41	EIA Scope	<p>The submission must include:</p> <ul style="list-style-type: none"> 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; and b) If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and / or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all GWDTE affected. 	SEPA 18	<ul style="list-style-type: none"> a) A figure(s) indicating potential GWDTE areas and the noted buffers overlain with the Proposed Development infrastructure will be included in the EIA Report. b) A site-specific assessment of GWDTE will be included in the EIA Report as a Technical Appendix.
42		<p>The submission must include:</p> <ul style="list-style-type: none"> a) A map demonstrating that all 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; and b) If the minimum buffers above cannot be achieved, a detailed site-specific qualitative and / or quantitative risk assessment will be required. SEPA are likely to seek 	SEPA 19	<ul style="list-style-type: none"> a) A figure(s) indicating potential GWDTE areas and the noted buffers overlain with the Proposed Development infrastructure will be included in the EIA Report. b) A site-specific assessment of GWDTE will be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	Comments
		conditions securing appropriate mitigation for all groundwater abstractions affected.		
43		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 SEPA require to be submitted in relation to disruption to GWDTE and existing groundwater extractions.	SEPA 20	The information presented in the Hydrology and Hydrogeology Chapter of the EIA Report and its associated Technical Appendices will be prepared in accordance with the noted guidance.
44	Forestry	In relation to forest removal and forest waste, 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.	SEPA 21	No felling is proposed.
45		<p>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:</p> <ul style="list-style-type: none"> • A map demarcating the areas to be subject to different felling techniques; • Photography of general timber condition in each of these areas; • 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; and <p>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 is found in Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, NatrueScot and FCS.</p>	SEPA 22	No felling is proposed.

No.	Subject	Task	Consultee	Comments
46	Development Design	Scottish Planning Policy states 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.	SEPA 23	A Borrow Pit Report will be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	Comments
47	EIA Scope	<p>A Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:</p> <ul style="list-style-type: none"> 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 m. The Applicant must 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 10 m 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) The Applicant must provide 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 	SEPA 24	<p>a) Maps will be included as part of the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix;</p> <p>b) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>c) The suitability of borrow pits will be discussed the Borrow Pit Assessment Report, which will be included in the EIA Report as a Technical Appendix;</p> <p>d) A ground investigation will be undertaken post consent to inform borrow pit design.</p> <p>e) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>f) This information will be detailed in the Draft CEMP, which will be included in the EIAR as a Technical Appendix;</p> <p>g) This information will be detailed in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix;</p> <p>h) Proposed peat storage areas and dimensions will be presented in the draft PMP, which will be included in the EIA Report as a Technical Appendix; and</p> <p>i and j) Indicative borrow pit restoration profiles will be provided in the PMP, which will be included in the EIA Report as a Technical Appendix.</p> <p>Further details of phasing and rock processing, etc., will be provided post-consent.</p>

No.	Subject	Task	Consultee	Comments
		<p>dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works;</p> <p>f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions;</p> <p>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;</p> <p>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 Proposed 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 requirements set out in Scottish Government Guidance) with all the built elements and excavation areas overlain so it can clearly be seen how the Proposed Development minimises disturbance of peat and the consequential release of CO₂;</p> <p>i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of materials to be used; and</p> <p>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.</p>		
48		A Schedule of Mitigation supported by the aforementioned site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction	SEPA 25	A Schedule of Mitigation, summarising all mitigation measures set out within the EIA Report, will be included in the EIA Report. The Hydrology and Hydrogeology Chapter

No.	Subject	Task	Consultee	Comments
		techniques and regulatory requirements. They should set out the daily responsibilities of the Environmental Clerk(s) of Works (ECoWs), how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.		of the EIA Report will include site-specific information relating to the water environment. Further information will also be provided in the Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
49	Development Design	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 on 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.	SEPA 26	Life extension and repowering proposals will not be included within the EIA Report. Details on decommissioning will be included in the Description of Development Chapter of the EIA Report.
50	Pollution and Waste	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.	SEPA 27	Waste management will be addressed in the draft CEMP, which will be included in the EIA Report as a Technical Appendix. It is not anticipated that any excavated waste materials would be generated during the works as all would be re-used on site.
51	Traffic and Transport	As there are no predicted changes to the Traffic and Transport elements of the Proposed Development, Transport Scotland is satisfied that the comments provided in our previous response of 11 September 2019 remain valid and have no further comment to make at this stage.	TS 01	Refer to Transport Scotland's 2019 Scoping Opinion (See Appendix 1)
52	Description of Development	The description of the Proposed Development set out in the EIA Report must include:	THC 01	The Description of Development Chapter in the EIA Report will detail the specific elements of the Proposed

No.	Subject	Task	Consultee	Comments
		<ul style="list-style-type: none"> a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases, including the 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 to substances or technologies used; an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and the estimated cumulative impact of the project with other consented or operational developments. 		Development. The assessment of the Proposed Development will be undertaken throughout the EIA Report
53	Alternatives	The EIA Report should outline the main development alternatives studied and an indication of the main reasons for the final project choice. This is expected to highlight the following:	THC 02	The Site Selection and Design Evolution Chapter of the EIA Report will detail the alternatives studied by the Applicant.

No.	Subject	Task	Consultee	Comments
		<ul style="list-style-type: none"> The range of technologies that may have been considered; Locational criteria and economic parameters used in the initial site selection; Options for access; Design and locational options for all elements of the Proposed Development (including grid connection); and The environmental effects of the different options examined. <p>The assessment should highlight sustainable development attributes including, for example, assessment of carbon emissions / carbon savings.</p>		
54	Assessment	The EIA Report must provide a description of the aspects of the environment likely to be significantly affected. The Applicant is encouraged to use their understanding of other wind developments in the area in assessing the Proposed Development to ensure that information provided is relevant and robustly grounded.	THC 03	The assessment of the Proposed Development is undertaken throughout the EIA Report.
55	Land Use and Policy	The EIA Report should recognise the existing land uses affected by the Proposed Development having regard for THC's Development Plan and supplementary guidance, particularly the Onshore Wind Energy Supplementary Guidance. 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. It is expected that a Planning Statement will also support an application to explore compliance with the Development Plan and consider Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development.	THC 04	These policy documents will be referenced within the Planning Policy and Context Chapter of the EIA Report and the Planning Statement, which will accompany the EIA Report
56		The Applicant should also consider the implications of the NPF4 position statement and other relevant national policy. Depending on	THC 05	These policy documents are referenced within the noted Chapter and the Planning Statement which accompanies the EIA Report.

No.	Subject	Task	Consultee	Comments
		the submission timescale of the proposal, other guidance and policy may have been developed at a national and local level. These should be taken into consideration where appropriate within the EIA Report.		
57	Landscape and Visual	THC expects the EIA Report to consider the landscape and visual impact of the Proposed Development.	THC 06	Landscape and visual impacts will be considered in the Landscape and Visual Chapter of the EIA Report.
58		While not mutually exclusive, landscape and visual 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 35 mm format full frame sensor camera, not an equivalent. The focal lengths required are 50 mm and 75 mm. These images should form part of the EIA Report and not be separate from it. Photomontages should follow the Council's Visualisation Standards.	THC 07	Visualisations produced to the THC 'Visualisation Standards for Wind Energy Development' (2016) and will be included as Volume 3B of the EIA Report and images for the panoramic viewer will be supplied. Technical details of visualisation will be included in a 'Technical Methodologies for Visual Representations' Technical Appendix.
59	Visualisations	Separate volumes of visualisations should be prepared to both Highland Council (THC) Standards and NatureScot guidance. These should be provided in hard copy. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in view. THC are happy to provide advice on this matter going forward.	THC 08	This will be undertaken. Volume 3A of the EIA Report will contain visualisations prepared to NatureScot Guidance. Volume 3B of the EIA Report will contain visualisations prepared to THC guidance.
60		All existing turbines should be re-rendered in visualisations even if they appear to be facing the viewer in the photograph to ensure consistency.	THC 09	This will be undertaken and detailed in the EIA Report in a Technical Appendix titled 'Technical Methodologies for Visual Representations' Technical Appendix.
61	EIA Scope, LVIA	The LVIA should include the expected impact of on-site borrow pits and access roads.	THC 10	The potential impact of on-site borrow pits and access roads will be considered in the Landscape and Visual Chapter of the EIA Report.

No.	Subject	Task	Consultee	Comments
62	Cumulative Study Area	The cumulative assessment study area should be the same as the visual assessment; however, if the turbines proposed are greater than 150 m, THC would encourage an increase to the study area to a minimum of 45 km.	THC 11	Agreement on cumulative assessment study areas has occurred in consultation with THC and will be set out in the Landscape and Visual Chapter of the EIA Report
63		To identify other schemes within the study area, the Applicant should use THC's Interactive Wind Turbine Map. Consultation should also be undertaken with ECU to understand which schemes are currently at scoping stage.	THC 12	The Interactive Wind Turbine Map has been used to identify cumulative sites. The final list of cumulative sites to be included in the assessment has been agreed with THC and NatureScot.
64		THC note that the 2020 Scoping Report does not contain a list of proposed developments to be included in the cumulative assessment. This should be agreed with the Planning Authority and NatureScot at the earliest possible opportunity.	THC 13	The final list of cumulative sites to be included in the assessment has been agreed with THC and NatureScot.
65	Viewpoints	Viewpoints (VP) for the assessment of effects of the Proposed Development must be agreed in advance of preparation of any visuals with THC. THC note that the proposed viewpoints are the same as the previous proposal on the site. However it is proposed to	THC 14	The final list of VPs has been agreed with THC and NatureScot.

No.	Subject	Task	Consultee	Comments
		<p>exclude a number of viewpoints. It is considered the following viewpoints should be reinstated:</p> <ul style="list-style-type: none"> VP2 – while it represents similar receptors to VP8 and VP9 it is recommended that it is retained as the design of the wind farm is likely to appear different from this location. VP4 – effects may be present (and potentially significant) from this area depending on scale of turbines VP21 – we are content for this to be excluded from the LVIA chapter but it should be included in the cultural heritage chapter VP22 – we are content for this to be excluded from the LVIA chapter but it should be included as visual in Wild Land Assessment <p>THC also request that a full visualisation pack should be provided for Seana Braigh (VP19) and Cul Mor (VP20).</p>		
66		THC welcome the reinstatement of VP4 and VP18. An additional viewpoint is also requested from the Struie Viewpoint on the B9176 to consider impacts on visitors to this important location at the edge of the Dornoch Firth NSA.	THC 15	The final list of VPs has been agreed with THC and NatureScot.
67		THC acknowledge that the revised scheme is for turbines of up to 149.9m and the ZTV is based upon that, although they note that this is not clear from the ZTV drawing itself. THC also acknowledge that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. THC 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	THC 16	Noted. A final viewpoint list has been agreed with THC and NatureScot.

No.	Subject	Task	Consultee	Comments
		that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography.		
68		The Applicant should consult THC on the VP locations again once prior to work commencing in detail on the LVIA.	THC 17	The final list of VPs has been agreed with THC and NatureScot.
69		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.	THC 18	The final list of VPs has been agreed with THC and NatureScot. Recommendations for VP locations noted from the 2019 scoping opinion and the 2020 scoping refresh p have been taken into account. There have not been any known VP requests from community councils.
70		The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information.	THC 19	The purpose of the selected and agreed viewpoints is set out in in the Landscape and Visual Chapter of the EIA Report, and associated appendices.
71	Study Area and Wirelines	Given the scale of the turbines, THC would encourage an increase to the study area to a minimum 45km study area and expect a that a detailed assessment of effects should be undertaken for the whole study area. THC would welcome early view of wirelines to identify effects from individual viewpoints.	THC 20	Turbines are proposed up to 149.9m. The Study Area for the landscape and visual assessment is proposed to be 40km in line with current best practice guidance (Visual Representation of Wind Farms, v2.2 (SNH / NatureScot, 2017) a detailed study area of 20km is proposed for assessment of residential areas and landscape character types.
72	Recreational Routes	The assessment of impact on recreational routes should include all core paths, the national cycle network, long distance trails and the North Coast 500.	THC 21	An assessment of the potential impact on recreational routes will be undertaken and detailed in the Landscape and Visual Chapter of the EIA Report.
73	Cumulative	The study area for cumulative impacts should extend to a minimum of 35km.	THC 22	Agreement on cumulative assessment study areas of 40km has occurred in consultation with THC and will be set out in the Landscape and Visual Chapter of the EIA Report.

No.	Subject	Task	Consultee	Comments
74		Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation with the Panoramic Digital Viewer deployed by THC.	THC 23	Images for the panoramic viewer will be supplied to THC.
75	Landscape	The NatureScot 2019 landscape character assessment should be used.	THC 24	The NatureScot 2019 Landscape Character Assessment will be referred to in the Landscape and Visual Chapter of the EIA Report.
76		An assessment on Wild Land Areas should be included within the EIA Report given the proximity to a number of wild land areas and theoretical visibility within these areas. NatureScot will provide further advice.	THC 25	An assessment on Wild Land Areas 34 and 37 has been undertaken in agreement with NatureScot and will be provided in the Landscape and Visual Chapter of the EIA Report and associated Technical Appendices.
77		The EIA Report should include an assessment of the proposal against the criterion set out in THC's Onshore Wind Energy Supplementary Guidance to be included in the LVIA.	THC 26	An assessment of the Proposed Development against relevant OWESG criterion will be provided in the EIA Report as a Technical Appendix entitled 'Appraisal THC's Criteria for the Consideration of Onshore Wind Proposals'.
78		The landscape assessment should assess the impacts on any landscapes designated at a national and local scale including the impact on Special Landscape Areas (SLA) using the SLA citations available on the Council's website.	THC 27	Potential impacts on Landscape designations will be assessed in the Landscape and Visual Chapter of the EIA Report.
79	Aviation Lighting	Aviation lighting is not considered a mandatory requirement due to the proposed scale and location of the turbines. The affect of the aviation lighting should be assessed through the EIA process if any aviation based consultees require it. If it is required by consultees then a Lighting Impact Assessment will be required. If required, then this is a matter that should be considered from all viewpoints. It should form part of the LVIA chapter of the EIA Report but should also be considered as part of the Wild Land Assessment if aviation lighting is required. Further advice on aviation lighting is available from NatureScot. A more comprehensive list will be required and should include at least, all viewpoints within designated landscapes,	THC 28	The selection of a turbine with tip height below 150m removes the requirement for visible aviation lighting.

No.	Subject	Task	Consultee	Comments
		Special Landscape Areas and within Wild Land Areas. Further the assessment should consider all of the viewpoints which are sought through the assessment.		
80	Residential Visual Amenity	We are content that residential visual amenity is assessed within the LVIA chapter of the EIA Report.	THC 29	Noted. Residential visual amenity will be assessed in the Landscape and Visual Chapter of the EIA Report.
81	Baseline Ecology Surveys	The EIA Report should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians etc.) and the habitats present on the site. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog in the context of both biodiversity conservation and risk of peat slide. The EIA Report should address whether or not the Proposed Development could assist or impede delivery of elements of relevant Biodiversity Action Plans.	THC 30	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
82		The EIA Report should provide a baseline survey of plants (and fungi) and trees present on the site.	THC 31	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
84	Designated ecological sites	The EIA Report should address the likely impacts on the nature conservation interested of all designated sites in the vicinity of the site and provide proposals for any mitigation to reduce any impacts to not significant.	THC 32	This has been undertaken and will be detailed in the Ecology Chapter of the EIA Report and associated Technical Appendices.
85	Wild Deer	If wild deer are present or use the site, an assessment of the potential impact on deer will be required.	THC 33	An assessment of the potential impact on deer as a result of the Proposed Development will be included in the Ecology Chapter of the EIA Report. A DMP will also be prepared and will be included as a Technical Appendix.
86	Aquatic Interests	The EIA Report should address the aquatic interests within local watercourses or downstream, that may be impacted by the Proposed Development. The EIA Report should evidence consultation input from local fishery boards where relevant.	THC 34	Potential effects on aquatic interests will be addressed in the Ecology Chapter of the EIA Report.

No.	Subject	Task	Consultee	Comments
87	GWDTE	The EIA Report should include an assessment on Ground Water Dependent Terrestrial Ecosystems.	THC 35	Impacts on GWDTEs will be assessed in the Ecology and the Hydrology and Hydrogeology Chapters of the EIA Report.
88	Ornithology	The presence of protected species such as Schedule 1 or European Protected Species must be considered as part of the planning application, not at a later stage.	THC 36	An assessment of potential effects on such species will be included in the Ornithology Chapter of the EIA Report and will be informed by recent survey effort.
89		An assessment of the impacts to birds through collision, disturbance and displacement will be required for both the development site and cumulatively with other proposals. The EIA Report should clearly set out the survey methods.	THC 37	An assessment of the potential impact of the Proposed Development on birds will be provided in the Ornithology Chapter of the EIA Report.
90	Operational Noise	The target noise levels are either a simplified standard of 35 dB LA90 at wind speeds up to 10 m/s or a composite standard of 35 dB LA90 (daytime) and 38 dB LA90 (night time) or up to 5 dB above background noise levels up to 12 m/s. The night time lower limit of 43 dB LA90 as suggested in ETSU is not acceptable in many areas of the Highlands due to the very low background levels. These limits would apply to cumulative noise levels from more than one development.	THC 38	The Noise Chapter of the EIA Report will include the required details.
91	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. The noise assessment must take into account predicted and consented levels from such developments. A map should be included showing all wind farm development which may have a cumulative effect and all noise sensitive properties including any for which financial involvement relaxation is being claimed.	THC 39	The Noise Chapter of the EIA Report will include the required details.
92		The assessment should include a table of figures which includes: <ul style="list-style-type: none"> The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12 m/s; 	THC 40	The Noise Chapter of the EIA Report will include the required details.

No.	Subject	Task	Consultee	Comments
		<ul style="list-style-type: none"> The maximum levels based on consented limits for each existing or consented scheme at each NSL; The predicted levels from each existing or consented wind farm development at each NSL; and The cumulative levels based on consented and predicted levels at each NSL. 		
93	Background Noise Measurements	Background Noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. Monitoring locations should be agreed with the Councils Environmental Health Officer. Sites should avoid other noise sources.	THC 41	The Noise Chapter of the EIA Report will include the required details. Monitoring locations have been agreed with the THC EHO.
94	Construction Noise	Where there is potential for disturbance from construction noise, the application will need to include a noise assessment. Construction noise assessment 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 mitigation measures should be provided.	THC 42	The Noise Chapter of the EIA Report will include the required details.
95		Regardless of whether a construction noise assessment is required, the best practicable means to reduce the impact of noise from construction activities should be employed.	THC 43	The Noise Chapter of the EIA Report will include the required details.
96	Amplitude Modulation	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.	THC 44	Noted
97	Noise Exposure	When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time.	THC 45	An assessment of noise, including cumulative, will be included in the Noise Chapter of the EIA Report.

No.	Subject	Task	Consultee	Comments
98	Cultural Heritage	All designated sites which may be affected by the Proposed Development either directly or indirectly should be identified.	THC 46	Potential for direct and indirect effects on cultural heritage assets will be addressed in the Cultural Heritage Chapter of the EIA Report.
99		An assessment should contain full appreciation of the setting of historic environment assets and the likely impact on their settings. If the assessment finds that significant impacts are likely, it would be helpful for appropriate visualisations to provided illustrating views both from the asset towards the Proposed Development and views towards the asset with the Proposed Development in the background.	THC 47	The setting of historic assets will be assessed in the Cultural Heritage Chapter of the EIA Report. A visualisation from Dail Broch SM will also be provided.
100		There are a large number of heritage assets in the vicinity of the Proposed Development; these need to be assessed. HES have provided detailed advice on potential setting impacts.	THC 48	Potential for direct and indirect effects on cultural heritage assets will be addressed in the Cultural Heritage Chapter of the EIA Report.
101		The Applicant should liaise with the Council's Historic Environment Team on the scope of archaeological assessments.	THC 49	The scope of the cultural heritage assessment will be provided in the Cultural Heritage Chapter of the EIA Report.
102	Water Environment	The EIA Report should address the nature of the hydrology and hydrogeology of the site and potential impacts on watercourses, water supplies (including PWS), water quality, and water quantity and on aquatic flora and fauna. Measures to prevent affects will be required along with monitoring proposals and contingency plans.	THC 50	This will be addressed in the Hydrology and Hydrogeology Chapter of the EIA Report and accompanying appendices.
103	Watercourse Crossings	Schemes should be designed to avoid crossing watercourses and to bridge watercourses where this cannot be avoided. The EIA Report should identify all water crossings and include a systematic table of watercourse crossings or channelising with detailed justification for the need and design to minimise impact. The table should be accompanied by photography of each watercourse affected and dimensions.	THC 51	Watercourse crossing information will be provided in Watercourse Crossings Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report

No.	Subject	Task	Consultee	Comments
104	Abstractions	The EIA Report should identify whether a public or private source would be utilised for any abstraction of water supplies. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	THC 52	Potential impacts on public and private water supplies will be addressed in a Private Water Supplies Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report
105	PWS	Any private water supplies should be investigated including pipework, which may be affected by the Proposed Development. Measures proposed to prevent contamination or physical disruption should be provided. THC has some information on known supplies but it is not definitive. An on-site survey will be required.	THC 53	An assessment of the Proposed Development on private water supplies will be undertaken and will be noted in chapter and a Private Water Supplies Technical Appendix, associated with the Hydrology and Hydrogeology Chapter of the EIA Report.
106	Peat	The EIA Report should consider the risks of engineering instability relating to the presence to peat on the site.	THC 54	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report
107		A comprehensive peat slide risk assessment should be carried out in accordance with the Scottish Government Best Practice Guide for Developers. This should include a detailed map of peat depth and evidence that the scheme minimises impact on deep peat. The EIA Report should include site specific principles on which construction methods would be developed for engineering works on peat.	THC 55	A PLHRA will be included as a Technical Appendix, associated with the Geology and Carbon Balance Chapter of the EIA Report
108		The EIA Report should include a full assessment on the impact of the Proposed Development on peat. This must include peat probing for all areas where Proposed Development is proposed including areas subject to micro-siting limits.	THC 56	Peat depth probing has been carried out across the site to inform the layout and assessment of effects. This will be detailed in the Geology and Carbon Balance Chapter of the EIA Report and associated Technical Appendices.
109	Carbon Balance	Carbon balance calculations should be undertaken and included in the EIA Report with a summary of the results focussing on the carbon payback period for the wind farm.	THC 57	A carbon balance calculation will be undertaken and will be reported in a Technical Appendix associated with the Geology and Carbon Balance Chapter of the EIA Report
110	Geology and Borrow Pits	The EIA Report should describe the significant effects of the Proposed Development on local geology. Proposals should demonstrate construction practices that minimise use of raw materials and maximise use of secondary aggregates and recycled	THC 58	Potential effects on geology will be provided in the will be included in the Geology and Carbon Balance Chapter of the EIA Report. A Borrow Pit Report will also be included in the EIA Report as a Technical Appendix.

No.	Subject	Task	Consultee	Comments
		or renewable products. Where borrow pits are proposed, the EIA Report should include information on the location, size and nature and on the depth of the borrow pit to the floor and reinstated profile.		
111	Traffic and Transport	A Transport Assessment or section on traffic and transportation will be required in the EIA Report. Where necessary, measures to mitigate impact of the Proposed Development on the road network should be set out.	THC 59	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include the required details.
112		The chosen Port of Entry and preferred route for the AIL shall be clearly demonstrated and include details of alternative routes considered. The proposed route for general construction traffic should also be identified and reviewed within the EIA Report.	THC 60	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment and a Route Survey Report (presented as Technical Appendices) which will include the required details.
113		Matters to be covered in the transport assessment include: <ul style="list-style-type: none"> Identify all public roads affected by the Proposed Development and routes used by suppliers; Establish current condition of the roads and will involve and engineering appraisal of the routes; Traffic resulting from the Proposed Development; Current traffic flows; Impacts of proposed traffic on roads, users, communities and a swept path analysis; Cumulative impacts with other developments; and Proposed mitigation measures to address impacts. 	THC 61	The Traffic and Transport Chapter of the EIA Report will be supported by a Transport Assessment (presented as Technical Appendix) which will include the required details.
114		The EIA Report should consider implications on the Trunk Road network.	THC 62	The Traffic and Transport Chapter of the EIA Report will consider implications on the Trunk Road network.
115	Socio-economic, Recreation and Tourism	Socio-economic, recreation and tourism should have its own chapter in the EIA Report. The EIA Report should estimate who may be affected by the Proposed Development and should include relevant economic information connected with the project and set out the impact on the regional and local economy, not just national.	THC 63	A Socio-economic, Recreation and Tourism Chapter will be included in the EIA Report, which will include the required details.

No.	Subject	Task	Consultee	Comments
116	Recreation	<p>A plan detailing the following should be submitted as part of the EIA Report:</p> <ul style="list-style-type: none"> Existing public non-motorised public access footpaths, bridleways, cycleways on the site and proposed access from the road infrastructure; Proposed public access provision both during construction and after completion of the Proposed Development, including links to existing path networks and to the surrounding areas, and access points to water; and Impacts of the Proposed Development on the core paths and proposed mitigation, if any. 	THC 64	A Draft Outdoor Access Management Plan, which will include the required details, will be prepared and provided as a Technical Appendix to the EIA Report.
117	Access Management Plan	The application should be accompanied by an Access Management Plan.	THC 65	A Draft Outdoor Access Management Plan will be prepared and provided as a Technical Appendix to the EIA Report.
118	Existing Infrastructure	The EIA Report should consider impacts on existing infrastructure; TV radio, telecommunication links, aviation, radar, MOD safeguards. Any consultations with relevant authorities should be set out through the provision of written evidence.	THC 66	This will be considered in the EIA Report.
119		There should be continued dialogue with HIAL over the impact on radar at airports in the area.	THC 67	Consultation responses from HIAL and potential effects on aviation will be provided in the Aviation Chapter of the EIA Report.
120		If there are no effects on communication links this should still be explained in the EIA Report.	THC 68	Noted
122	Shadow Flicker	If there are no properties within 11 rotor diameters, shadow flicker will not require detailed assessment but should still be addressed in the EIA Report.	THC 69	Noted. Shadow flicker will be scoped out of the EIA Report.
123	Trees and Forestry	If any areas of woodland likely to be affected by the Proposed Development (including its access) the Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIA Report.	THC 70	No felling is proposed.

No.	Subject	Task	Consultee	Comments
124		The EIA Report should indicate all areas of woodland / trees that will be felled to accommodate the Proposed Development. Compensatory planting is an expectation for any felling. This matter does not require to be contained within the EIA Report but should be included in a separate assessment submitted with the application.	THC 71	No felling is proposed.
125	Local Environment	Existing air quality and general qualities of the local environment including background noise, sunlight and prevailing wind should be considered in the EIA Report. Expected impacts of any development can be founded from this base data.	THC 72	Local environmental factors will be considered throughout the EIA Report.
126	Dust	Depending on the proximity of working areas to house, the Applicant may be required to submit a scheme for the suppression of dust during construction.	THC 73	This information will be provided in Draft CEMP, which will be included in the EIA Report as a Technical Appendix..
127	Climate	The EIA Report 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.	THC 74	This will be considered in the EIA Report.
128	CEMD	An outline CEMD should be included with the application.	THC 75	This information will be provided in Draft CEMP, which will be included in the EIA Report as a Technical Appendix.
129	Significant Effects	The EIA Report needs to describe the likely significant effects of the Proposed Development on the environment; direct and indirect effects, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative, resulting from the existence of the Proposed Development; use of natural resources and emission of pollutants	THC 76	The assessment of likely significant environmental effects will be undertaken throughout the technical chapters of the EIA Report.

No.	Subject	Task	Consultee	Comments
130	Mitigation	A description of the measures envisaged to prevent, reduce and where possible offset significant adverse impacts on the environment must be set out in the EIA Report. A clear summary table of all mitigation measures associated with the Proposed Development should be provided and entitled draft 'Schedule of Mitigation'. It should be clear in the EIA Report exactly which groups are being involved in implementing mitigation.	THC 77	Mitigation measures will be identified within each Technical Chapter. A Schedule of Mitigation Measures will be included in the EIA Report.