

APPENDIX 7.1: CONSULTATION REGISTER

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response
Statutory Consultees				
Scottish Government, Energy Consents Unit	16/10/2017	Baseline	The baseline for the purpose of assessment should be the operational Tangy I and Tangy II wind farm (scenario 2). The decommissioning of Tangy I and Tangy II should therefore be assessed as an integral part of the construction of the proposed Tangy IV, being delivered as a single project.	The baseline for the assessment contains the existing Tangy I & II wind farm.
		Visible Lighting Assessment	ECU are content for a detailed (visible) lighting effect assessment to be scoped out of the EIA Report for Tangy IV	Assessment of Visible Lighting Effects scoped out, as agreed with ECU and SNH.
Argyll and Bute Council (17/01213/SCOPE)	04/07/2017	Scoping	The content of the 'Scoping Report' dated April 2017 is broadly acceptable, and it is considered that the proposed scope of the environmental assessments detailed therein will form a generally appropriate structure for EIA Report preparation.	Noted
		Alternatives	The EIA Report should include an outline of the main alternatives studied and indicate the reasons for choosing the selected option. The relative merits of the proposal to the repowering scheme for which planning permission has already been granted should be reviewed. The scale and layout of the development should be designed so as to minimise the impact of the development upon key environmental features, significant views and site designated for their ecological/historical or scenic qualities. The principles to be adopted in the design process should be made explicit, and could take the form of a Design Statement as advocated in PAN 68. The relative merits of repowering an existing wind farm site as opposed to developing a hitherto undeveloped location should be reviewed	EIAR Chapter 1: Introduction discusses the need for the proposed development. EIAR Chapter 4: Site Selection and Alternatives outlines the design process and main alternatives studied.
		Built Elements	The EIA Report should identify the location of all built elements, including turbines, crane hardstandings, laydown and site compound areas, access and cable routes; borrow pits and switchgear and control buildings. These should be sited so as to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development. The assessment should address the construction, operational and decommissioning phase of the development.	EIAR Chapter 5 Description of Development presents all built elements and addresses the construction, operational and decommissioning phase of the proposed development. Figure 5.1: Site Layout can be found in Volume 3a: Figures EIAR Chapter 4: Site Selection and Alternatives discusses how sensitive areas have been avoided
		Cumulative Impact	A Cumulative Impact Assessment will be important in exploring the full consequences of development on key views and the landscape assets of Argyll (plus the Isle of Arran), and this should not only address inter-visibility and the visibility of multiple windfarms from key viewpoints, but should address the consequences of travelling through the landscape and sequential views. Cumulative Impact can also have other significant land use planning implications, particularly in relation to: noise, aviation, built & cultural heritage, ornithology, ecology, and hydrology. Advice is given on cumulative assessment in 'Cumulative Effects of Windfarms' (Scottish Natural Heritage March 2012). The Council would expect the Cumulative Assessment to follow the advice of SNH.	Cumulative Impact Assessment have been reviewed as part of the EIA process and are referred to within each EIAR technical chapter, as relevant. Cumulative ZTVs are included in Figures 8.10.1-8.10.4.13 produced according the relevant guidance documents and SNH advice.
		Landscape and Visual	Zones of Theoretical Visibility should be prepared in respect of the individual development proposed, along with ZTV's in respect of cumulative effects with other approved or proposed wind farms, which should be shown overlain upon each other. The Council would expect ZTV's to be prepared in accordance with the advice of SNH.	EIAR Chapter 8: Landscape and Visual provides ZTV mapping, also found in Volume 3a: Figures
			Consequences of the development for landscape character should be assessed and detailed in a 'Landscape Character Assessment'. Particular consideration should be given to the consequences for sensitive environments, including in particular the North Arran National Scenic Area and Areas of Panoramic Quality (regional status) defined by the Council's 'Argyll & Bute Local Development Plan' 2015. The landscape and visual assessment should address all aspects of the proposal (access to the site and within the site, borrow pits, control/transformer buildings, and grid connection route) as well as turbine locations.	EIAR Chapter 8: Landscape and Visual provides an assessment of the landscape and visual baseline and potential significant effects. This includes analysis of current planning policy and guidance, designations (North Arran National Scenic Area and Areas of Panoramic Quality) and landscape character of designated and non-designated landscapes. All aspects of the proposed development are assessed in the LVIA, and permanent features are illustrated in photomontages (see Technical Appendix 8.1 and Volume 3b: Visualisations).
			In determining the proposal's visual impact, the layout of the wind farm should be assessed from key viewpoints. Visually sensitive viewpoints include those where there may be views to, or from designated landscapes; however, sensitivity is not confined to designated interests. Visually sensitive viewpoints can include those which are frequently visited by people (such as well-used transport corridors, tourist roads or picnic spots), settlements where people live, other inhabited buildings or viewpoints which have a landscape value that people appreciate (and which they might visit for recreational pursuits such as hill walking, cycling or education).	The proposed development is assessed from key viewpoints. See Technical Appendix 8.3 for selection process. Westport Beach (VP26) included.
			It is noted from the Scoping Report that a revised LVIA will be undertaken which will assess the effects of the proposal on the landscape, views, visual amenity and receptors within the study area and the Zone of Theoretical Visibility (ZTV) and the Council supports that approach. The additional viewpoint from Westport Beach is also noted (as recommended by SNH). Furthermore, the Visualisations from each viewpoint will be prepared in accordance with best practice guidance (SNH, Visual Representation of Windfarms). It is recommended that the advice of SNH is sought in this regard.	Noted. SNH has been consulted throughout the process
		Ornithology	The Council accepts the ornithology assessment approach and recommends that the views of SNH and RSPB are sought in preparation of further ornithological information.	Noted. SNH and RSPB have been consulted. The ornithology assessment can be found in EIAR Chapter 9.
		Ecology	It is proposed to scope out the assessment of Ecology from the ES as it would be unaffected by an increase in height or rotor diameter. The proposed replanting of the site to a keyhole design is not considered to alter the previous assessment of effects. It is recommended that the advice of SEPA and SNH is sought prior to these matters being scoped out of the assessment. In the absence of concerns being raised by those organisations the Council would be content for this subject area to be scoped out.	Noted. SNH and SEPA have been consulted throughout the process. The ecology assessment can be found in EIAR Chapter 10.
		Geology, Soils and Hydrogeology	It is noted from the Scoping Report that as the footprint of the proposal remains unchanged from that presented and assessed in the ES (2014), it is proposed to scope out the assessment of Geology, Soils and Hydrogeology from the ES. A detailed Peat Management Plan for the construction of the proposed development informed by further site investigation will still be included. It is recommended that the advice of SEPA and SNH is sought prior to these matters being scoped out of the assessment. In the absence of concerns being raised by those organisations the Council would be content for this subject area to be scoped out.	Noted. SNH and SEPA have been consulted throughout the process. The assessment of Geology, Soils and Peat can be found in EIAR Chapter 11; the assessment of Surface Water can be found in EIAR Chapter 12; and the Peat Management Plan can be found in Appendix 11.3.
		Waste	Consideration should be given in the ES to all potentials waste streams, how waste will be reduced, re-used and/or recycled and a Site Waste Management Plan should be prepared. The development should maximise the use of secondary aggregates or recycled materials and the production of waste materials should be minimised.	EIA Chapter 5: Description of Development include a brief description of the proposed dismantling and removal of turbines, bases, cables, substation, control building and access tracks. This includes reference to waste minimisation as appropriate. Proposed waste management plan can also be found in Appendix 5.1: CEMP.
		Cultural Heritage	The Council's archaeological advisors are the West of Scotland Archaeological Service who have been consulted in respect of the implications for those historic environment assets identified in the Scoping Report, unfortunately no response has been received at the time of writing. It is recommended that the advice of Historic Scotland is sought in respect of any sites which have scheduled status.	Noted. HES has been consulted at scoping.
Forestry	The Council would be content for FCS to specify EIA Report requirements in respect of this proposal.	Noted. FCS has been consulted at scoping. Information on the agreed forest management proposals is provided in EIAR Chapter 16: Land Use, Socio-economics and Recreation		
Land Use, Socio-economics and Recreation	The Council supports the approach of an updated socio-economic impact assessment to capture the increased installed capacity. The EIA Report should address the consequences of the development for users of the countryside and tourism and recreation interests, including any deterrent influence the proposal may have, along with any attractive interest the presence of the wind farm may generate. The proposal should not result in the unacceptable loss of amenity to individuals who enjoy recreation pursuits on land or water. Consideration should be given not only to any use of the site itself but also any impact the presence of the development may have upon surrounding recreation/tourism assets. The proposal should not give rise to adverse effects on any existing or proposed public access for walking, cycling, horse riding etc, unless it retains existing or potential public access, while maintaining or enhancing its amenity value; or an alternative access is provided, which must be no less attractive and is safe and convenient for public use.	EIAR Chapter 16: Land-use, Socio-economics and Recreation addresses and provides an assessment of the socio-economics, recreation/tourism baseline and potential significant effects.		
Transport & Access	These will primarily be concerned with the construction phase and should in particular consider off-site consequences for the road network in terms of delivery routes and stress points associated with the transport of abnormal loads. The EIA Report should include: a plan showing the proposed access point and haul route; a Traffic Management Plan, which should include details of all materials, plant, equipment, components and labour required during the consultation, operation and decommissioning phases; and a detailed Method Statement in relation to access and transport of materials, plant and equipment.	EIAR Chapter 15: Access Traffic and Transport provides an assessment of the access traffic and transport baseline and potential significant effects. The outline Traffic Management Plan can be found in Appendix 15.2		

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		Public Safety & Amenity	A noise assessment methodology compliant with nationally recognised guidance should be agreed in advance with the Council's Public Protection Service in respect of both the construction and operational phases of the development. Operational noise should satisfy the standard set by ETSU-R-97 'The Assessment and Rating of Noise from Wind Farms' which is the methodology recommended in planning guidance PAN1/2011 'Planning and Noise'. Note that noise monitoring locations and methodologies should be agreed with the Council's Environmental Health officers in advance of any survey work being conducted. The assessment and mitigation of construction noise should follow the guidance set out in BS5228 'Noise and Vibration Control on Construction on Open Sites'.	EIAR Chapter 14: Noise provides an assessment of the noise baseline and potential significant effects. This includes analysis of current planning policy and guidance. Consultation was undertaken with the Argyll and Bute Council EHO, who confirmed agreement with the proposed methodology on 7/6/2018.	
			It is noted from the Scoping Report that an assessment of impacts on air quality is to be scoped out and the Council accepts this approach on the understanding that a Construction Management Plan addresses matters such as the control of dust from the site and access roads/tracks and site lighting during the construction phase.	Appendix 5.1: Construction Environmental Management (CEMP) discusses pollution monitoring and controls which covers air quality	
			The potential impact on private water supplies in the vicinity of the development should be considered. Where any such supplies are identified and, in particular those which abstract from surface sources, the applicants should confirm the measures to be taken to avoid causing contamination during the construction phase.	Appendix 12.2: Private Water Supplies (PWS) provides an assessment of the potential impact on PWS	
			Consequences for occupiers of property and countryside users should be assessed in terms of shadow flicker.	EIAR Chapter 17: Shadow Flicker and Appendix 17.1: Shadow Flicker Assessment presents an assessment of potential shadow flicker effects	
		Aircraft, Aerodromes and Technical Sites: Safeguard Zones and Electro-Magnetic Interference	The siting of wind turbines can have implications for flight paths of aircraft (including helicopter flight paths), airport radar and communications (civilian or military) and weather radar stations. They can potentially interfere with electromagnetic transmissions of aviation operations, depending on their size, shape, construction materials and location. Their support structure and rotating blades can have an effect on communication, navigation and surveillance by giving off false radar returns and masking (shadowing) genuine aircraft returns. The consequences of the proposal for military and civil aviation should be assessed and included in any EIA Report along with impacts upon radar. Consultations with MoD, National Air Traffic Services and airport operators (Highlands & Islands Airports, BAA Glasgow and Prestwick Airport) will be appropriate in this regard.	EIAR Chapter 18: Aviation presents an assessment of potential aviation effects. MoD, National Air Traffic Services and airport operators (Highlands & Islands Airports, BAA Glasgow and Prestwick Airport) have been consulted at scoping.	
		Electro-Magnetic Interference (Communications Systems) and Television Reception	It is impossible to obtain a definite picture of all the transmission routes across any site for a wind energy development due to the large number of bodies who use communication systems. The Office of Communication (Ofcom) and the Joint Radio Company should be contacted to identify any potential television and radio broadcasting, telecommunication and wireless communication issues. It is also advisable that applicants contact other authorities or bodies responsible for communication systems such as the BBC/ITC, police, mobile telephone network operators and utility companies.	The Joint Radio Company and BT have been consulted and have both concluded that the proposed development will have no effect on their networks.	
		Decommissioning	It is considered that the environmental impact of decommissioning should be considered and included in the EIA Report.	General details of decommissioning intentions are set out within EIAR Chapter 5: Description of Development. Decommissioning have also been reviewed as part of the EIA process and are referred to within each EIA technical chapter, as relevant.	
		Grid Network	It is usual for national grid infrastructure (e.g. a substation or power lines) to be considered in the round as a part of the approval process for a wind farm and for mitigation to reduce impact of both sub-stations (through design and landscaping) and cabling (through selective under-grounding and sensitive routing). All connections from an onshore wind farm to the substation should be underground to reduce visual impact, unless there are environmental reasons for not doing so. Sub-stations and power lines connecting to the national grid should be sited with minimum ecological, cultural landscape, visual and cumulative impacts. Details of the intended grid connection to at least the level of an indicative route and whether this is to be underground or overground should be provided.	The assessment of a grid connection route is scoped out of the EIA for the proposed Tangy IV Wind Farm, on the basis that the grid connection would be subject to a separate consenting and environmental assessment process, led by or in consultation with the transmission license holder. EIA Chapter 5: Description of Development will describe the onsite elements of underground cable work, substation and control buildings. However, at this stage, the route and proposed technology solution for the proposed grid connection are subject to separate application.	
		Borrow Pits	It is noted that further work was requested in relation to Borrow Pit C and its potential risk to Private Water Supplies and that this additional assessment was acknowledged by the developer at the time and it is proposed to undertake this prior to construction commencing and the results of which will inform the CEMP.	Further information in relation to Borrow pit C and PWS is provided in Chapter 12: Surface Water.	
		Macro Environmental Considerations	The Environmental Report should quantify the contribution which the development will make towards the attainment of Scottish renewable electricity generation targets, and should systematically assess carbon balance considerations, particularly in terms of the extent to which the proposal would release carbon dioxide during construction by virtue of disturbance to areas of peat. This should be reviewed in the light of the advice given in 'Calculating carbon savings from windfarms on Scottish Peat Lands' (Scottish Government).	EIAR Chapter 3: Renewable Energy Policy Context discusses the contribution which the proposed development will make towards the attainment of Scottish renewable electricity generation targets. The results of the Carbon Calculator are summarised in Chapter 5: Description of Development and further detail can be found in Appendix 5.2.	
Baseline	The Council considers the approach proposed, to consider the existing development as part of the baseline, as consistent with SPP, and the Scottish Government's Onshore Wind Policy Statement (draft) is appropriate in this case. Some graphic representation of existing wind farm, the currently consented repowering proposal and the alternative proposal now being scoped would be useful in order to represent the relative scale of the proposals against that of the operating wind farm. It is noted that SNH are currently preparing guidance on assessing repowering applications and that the applicant plans to consult on the draft guidance when it becomes available.	The baseline for assessment contains the existing Tangy I & II Wind Farm. The existing Tangy I and II and proposed Tangy IV development are illustrated in Figures 8.9.1.1-8.9.27.5 and 8.11.1.1-8.11.3.2 (Volume 3b: Visualisations).			
Scottish Environment Protection Agency (SEPA) Brian Fotheringham Senior Planning Officer (PCS/152849)	26/05/2017	Overview	We accept the modifications being proposed to the consented site design which will result in it exceeding the 50MW threshold involve changes to the tip height and to the rotor diameter of the turbines. We would advise that it is unlikely that these proposed alterations to the wind turbines will prejudice our interests.	Noted	
		Private Water Supplies	We do not agree with the approach as outlined in Chapter 7.2 Surface Water with regard to the issues associated with the potential risks to Private Water Supplies located in the vicinity of the site. Whilst we acknowledge that although the applicant accepts that further site assessment work will require to be undertaken in respect of the four properties that have groundwater fed PWS and also in relation to the potential impacts of Borrow Pit C we do not support their intention to address this matter 'prior to construction commencing at the site' for inclusion in the CEMP. Our position is consistent with the views we expressed in our previous responses to the Tangy III windfarm proposal. We submitted and maintained an objection to the proposed development as the potential impacts to PWS from the development had not been satisfactorily assessed. We therefore require additional site investigation works are undertaken to understand the implication to the source and quantity of these supplies and the potential impacts of the site infrastructure should be an integral part of the EIA process, particularly if the findings of these works will necessitate changes to the site design and/or the agreement of a third party to supply them with an alternative potable supply on a temporary or permanent basis. This is the approach outlined in SEPA's Land Use Planning Guidance. In another letter to A&B Council from March 2015 we also expressed concern that borrow pit C is within 250 m of identified PWS B. It was recommended that borrow pit excavations take place outwith the 250 m buffer. Alternatively, a quantitative hydrogeological assessment should be carried out to demonstrate that the risk to the PWS was not significant. The assessment should be carried out in accordance with the Land Use Planning System Guidance Notes 4 and 31. Furthermore, the applicant stated that pumping may be employed within the borrow pit. The applicant should therefore assess the potential requirement for pumping for compliance with GBR 2 or GBR 15 as outlined in the Water Environment Controlled Activities (Scotland) Regulations 2011 (as amended)(CAR). Abstraction of groundwater in quantities greater than 10m3/day may require a CAR permit depending on the scope and duration of the work.	See EIAR Chapter 12: Surface Water Section 12.5: Baseline Conditions See EIAR Chapter 12: Surface Water Section 12.5: Baseline Conditions See EIAR Chapter 12: Surface Water Section 12.6: Effects Evaluation and Appendix 5.1: CEMP	
		Decommissioning/Repowering	We have recently published guidance outlining our position on the extension and repowering of on-shore wind farms as they relate to areas within our remit. Reference should be made to this as proposals are refined for future site decommissioning within the CEMP. Please note SEPA is currently considering the waste regulatory position of material such as rubble, foundations and cabling which may be reused or abandoned on site during decommissioning or repowering. Any proposal to discard materials that are likely to be classed as waste would be unacceptable under current waste management licensing and potentially under waste management licensing at time of decommissioning if a similar regulatory framework exists at that time. Further guidance on this may be found in the document 'Is it waste - Understanding the definition of waste'. We expect this updated guidance to be included and commented upon within the outline CEMP which is to be provided as a 'supporting document'. Proposals to discard materials that are likely to be classed as waste would be unacceptable under current waste management licensing and under waste management licensing at time of decommissioning if a similar regulatory framework exists at that time. The layout and the general principles for decommissioning must demonstrate waste minimisation and compliance with the above waste regulatory position.	The recently published SEPA guidance is referenced in Appendix 5.1 CEMP The recently published SEPA guidance is referenced in Appendix 5.1 CEMP The recently published SEPA guidance is referenced in Appendix 5.1 CEMP	
		Site Layout	All maps must be based on the Ordnance Survey 1: 10 000 scale or greater base mapping to provide an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges.	All maps can be found in Volume 3a: Figures. All built elements, including existing are discussed in EIA Chapter 5: Description of Development. Site Layout Plan can be seen in Figure 5.1 (Volume 3a: Figures).	

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		Engineering activities in water environment	<p>The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in the water environment cannot be avoided then the submission must include a map showing:</p> <p>a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. b) A minimum buffer of 50 m around each loch or watercourses. If this minimum buffer cannot be achieved each breach must be numbered on a plain with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.</p>	<p>EIAR Chapter 4: Site Selection and Alternatives outlines the design process how sensitive areas have been avoided.</p> <p>EIAR Chapter 12: Surface Water provides an assessment of the hydrology baseline and potential significant effects. Summary of mitigation can be found in EIAR Chapter 19: Schedule of Mitigation.</p> <p>A buffer of 50 m has been applied around each loch or watercourses as shown in Figure 12.1 (Volume 3a: Figures)</p>
			If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	All construction work will comply with the appropriate requirements under the CAR. Further information would be provided (where required) in seeking a Construction Site License and other authorisations un the CAR regime - see Appendix 5.1 CEMP.
			<p>Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our 'Construction of River crossings Good Practice Guide.</p> <p>Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our 'Technical flood risk guidance for stakeholders' outlines the information we require to be submitted as part of a Flood Risk Assessment.</p>	Effects of the proposed development on flood risk has been scoped out as not having the potential for significant effects. For more detail, please refer to EIAR Chapter 12: Surface Water.
		Peat	<p>The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat throughout, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat.</p> <p>The submission must include:</p> <p>a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's 'Development on peatland: Site surveys and best practice') with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids area of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems. b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed width and depths of peat to be re-used and how it will be kept wet permanently must be included.</p> <p>To avoid delay and potential objection proposals must be in accordance with 'Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste' and our 'Regulatory Position Statement – Developments on Peat'.</p> <p>Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed above) is required or whether the above information would be best submitted as part of the schedule of mitigation.</p> <p>Please note we do not validate carbon balance assessment except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.</p>	<p>EIAR Chapter 4: Site Selection and Alternatives outlines the design process how sensitive areas have been avoided. EIAR Chapter 11: Geology, Soil and Peat provides an assessment of the peat baseline and potential significant effects. Summary of mitigation can be found in EIAR Chapter 19: Schedule of Mitigation and Appendix 11.3: Peat Management Plan.</p> <p>Geological site walkover survey, detailed peat assessment (Appendix 11.1), the CEMP (Appendix 5.1), peat management plan (Appendix 11.3) and the borrow pit assessment (Appendix 11.2) conducted as part of the environmental impact assessment.</p>
				Noted
		GWDTE & Existing groundwater abstractions	<p>GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The following information must be included in the submission:</p> <p>a) A map demonstrating that all GWDTE and existing groundwater abstraction are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE and existing groundwater abstractions affected.</p> <p>Please refer to 'Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems' for further advice and the minimum information we require to be submitted.</p>	<p>The layout of the proposed development does not avoid impacts on all GWDTE areas, therefore a site specific risk assessment is included in Section 10.6: Effects Evaluation.</p> <p>The GWDTE present in the ecological study area are shown on Figure 10.4: GWDTE (Volume 3a: Figures), with appropriate 100 m and 250 m buffers around new cut access tracks and turbines, respectively. Not all GWDTE are outwith these buffers. Surveys were not required to extend beyond the site boundary.</p> <p>The minimum buffers cannot be achieved, therefore a detailed site specific risk assessment is included in Section 10.6: Effects Evaluation.</p>
		Forestry	<p>If forestry is present on site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.</p> <p>The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with 'Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS'.</p>	EIAR Chapter 4: Site Selection and Alternatives outlines the design process how sensitive areas have been avoided. Felling Figure can be found as Figure 16.1 and Replanting as Figure 16.2 in Volume 3a: Figures
		Borrow Pits	<p>Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement.</p> <p>The following information should also be submitted:</p> <p>a) A map showing the location, size, depths and dimensions of each borrow pit. b) A map showing in relation to each proposed excavation, stocks of rock, overburden soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres from working areas. c) A site-specific buffer 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 plain with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table. e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works. f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions. g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily. h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's 'Developments on peatland: Site surveys and best practice') with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO2. i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.</p>	<p>Geological site walkover survey, detailed peat assessment (Appendix 11.1), the CEMP (Appendix 5.1), peat management plan (Appendix 11.3) and the borrow pit assessment (Appendix 11.2) conducted as part of the environmental impact assessment.</p>
		Pollution prevention and environmental management	<p>One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration.</p> <p>A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques, regulatory requirements, the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the 'Pollution prevention guidelines'.</p>	Schedule of Mitigation can be found in EIAR Chapter 19. Best practices are covered in respective technical chapters and pollution control measures are outlined in Appendix 5.1: CEMP.

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response
Scottish Natural Heritage (SNH) Paul Taylor Renewable Energy Casework Adviser - West (CEA 145871)	26/06/2017	Baseline	<p>Our advice is that the EIA should appraise the full effects of the new proposal. This would allow decision-makers to weigh this aspect against all other material considerations, including the current use of the site as a wind farm. We believe that such an approach best reflects the intention of SPP to achieve the right development in the right place, and not any development at any cost. A comparison of the effects of the new proposal with those of the existing wind farm will be helpful to decision-makers, but we advise that this should be separated from the approach to EIA. It could, for example, be presented within the application's Planning Statement.</p> <p>We have concerns with the proposal to include the current wind farm in the baseline for EIA. The inclusion of existing development in an assessment baseline normally implies that there would be a combined or additive effect with the new proposal. In this case the proposed wind farm and the existing scheme cannot both physically co-exist. Presumably, therefore, the applicant intends to consider the existing wind farm within the 'baseline' in such a way as to allow the adoption of a comparative ('gap') assessment approach to EIA.</p> <p>This approach allows there to be reasoning that a proportion of the potential effects of the new scheme would, in essence, be cancelled out by the effects of the existing wind farm. For example, it could be asserted that the magnitude of change for an effect is not large when considered only as an addition to the existing wind farm's effect, and that it is therefore not significant, or that it is less significant than it could be otherwise (i.e. than if the new proposal was considered in its own right).</p>	The baseline for the assessment contains the existing Tangy I & II Wind Farm, as directed in the Scoping Opinion.
			We acknowledge that Scottish Planning Policy (SPP) states that the current use of a site as a wind farm would be a material consideration for repowering. It would therefore be helpful to present a comparison between the likely significant effects of the new proposal and the effects of the existing wind farm. However, in our view, the decision-maker must be able to weigh this against other material considerations, including the clearly identified, and full, likely significant effects arising from the new proposal. In order to avoid confusion, we advise that any comparative assessment should be clearly separated from the approach to EIA. It could, for example, be presented as part of the planning application itself (e.g. within the Planning Statement). In this case, decision-makers may also find it helpful to consider comparison with the scheme which was granted permission in 2015.	The baseline for the assessment contains the existing Tangy I & II Wind Farm, as directed in the Scoping Opinion. A comparison with the consented wind farm is only made in Chapter 4: Site Selection and Alternatives.
			In addition to the arguments above, the existing wind farm is a time-limited change to the landscape and is due to be decommissioned in line with its planning conditions in 2022. This brings Section 31 of the EIA Regulations ¹ into consideration, because the evolution of the environment would still be towards there being no existing wind farm on the site: "(31) The environmental impact assessment report to be provided by the developer for a project should include a description of reasonable alternatives studied by the developer which are relevant to that project, including, as appropriate, an outline of the likely evolution of the current state of the environment without implementation of the project (baseline scenario), as a means of improving the quality of the environmental impact assessment process and of allowing environmental considerations to be integrated at an early stage in the project's design."	The baseline for the assessment contains the existing Tangy I & II Wind Farm, as directed in the Scoping Opinion.
	Landscape and Visual	We provided consultation advice to Argyll and Bute Council on 16 March 2015 in relation to the previous proposal (for the same number of turbines, in the same layout, but with smaller turbine dimensions – i.e. 125m to tip and 105 rotor diameter). Therefore, please refer to that previous response letter for an indication of the landscape and visual advice we may provide for the new proposal. With the proposed introduction larger turbines, landscape and visual effects are likely to be exacerbated, and other new significant effects may arise. It is therefore very likely that our new advice will be similar, but strengthened.	Noted	
		Noting the discussion (in the above section) about assessment baselines, our March 2015 consultation response advised that, in our view, the baseline for the Landscape and Visual Impact Assessment (LVIA) should be without the existing wind farm. As a result we considered that the magnitude of change throughout the LVIA had been underestimated. However, we also acknowledged that we had not previously given clear advice on this matter, and we therefore, for clarity and comparison with the LVIA, based our appraisal on the same baseline used by the applicant, i.e. including the existing Tangy wind farm, with the caveat that effects are likely to be underestimated. We advised that the Council should be aware that were the baseline without the existing Tangy wind farm, then the magnitude of change would be greater and, therefore, this would likely increase the significance of effects arising from the proposal.	The baseline for the assessment contains the existing Tangy I & II Wind Farm, as directed in the Scoping Opinion.	
	Landscape and Visual (visible aviation lighting)	We advise that the details of any visible aviation lighting of turbines should be submitted at the time of the application and the likely landscape and visual effects of such lighting integrated into the assessment findings from relevant viewpoints. If visible lighting becomes relevant for this proposal, we would welcome further related pre-application discussion with the applicant on the scope of the assessment including related visualisations.	Further consultation conducted and Assessment of Visible Lighting Effects was agreed to be scoped out via email as a result.	
	Landscape and Visual (Viewpoints)	Our comments on visual effects (both individual and cumulative) in our response of March 2015 should also be used to inform viewpoint selection; with the B843 and Kintyre Way (Carradale to Campbeltown) being fully considered. We would also request consideration, alongside other Machrihanish viewpoints, of a further viewpoint at the clubhouse at Machrihanish Dunes golf club.	Receptors at Viewpoints along these routes; and travelling along the routes are assessed. Machrihanish Dunes (VP27) included.	
		In order to agree the final list of viewpoints (and potentially provide other pre-application advice) we request: • Detailed Zone of Theoretical Visibility (ZTV) maps in accordance with our guidance for: o the new proposal compared with the existing wind farm (out to 35km) illustrating areas of additional visibility; and differentiating between both increased visibility and new visibility; o the new proposal compared with the previous 2014 application scheme (out to 20km) illustrating areas of additional visibility; and differentiating between both increased visibility and new visibility. • An updated / revised table with viewpoint information and related justification for selection or omission. The table should include representative viewpoints for areas of increased visibility or new visibility where effects could potentially be significant. Cumulative viewpoints should also be included and briefly justified. • Draft wirelines to illustrate the above would be useful, especially in areas where increased or new visibility is likely to be an issue.	ZTV figure can be found in Volume 3a: Figures, figures 8.1.1 and 8.1.2. Comparative ZTV is figure 8.2 and cumulative ZTVs are figure 8.10. ABC and SNH have been consulted regarding viewpoints. The list of viewpoints and reason for inclusion can be found in EIAR Chapter 8: Landscape and Visual Table 8.14. Wirelines can be found in Volume 3b: Visualisations, figures 8.9 and 8.11	
		We request a hard copy of the ZTVs at A1 or A0 size, showing proposed viewpoints and ZTV radii at 5km intervals. The ZTV should extend beyond the focus of the study area (e.g. 20km or 35km radius), out to the edges of the page. We request that the hard copies of this information are sent to Julie McAndrew at our Clydebank office, and electronic copies of the same (at <10MB file size per document) are sent to Paul Taylor at our Stirling office. Once we receive this information we can provide further advice on the viewpoint selection.	'Further Information on the LVIA, as requested by SNH' sent 15th December 2018. VP numbers and coordinates in this document are now superseded by those in LVIA.	
	Landscape and Visual (Visualisation)	We note the applicant's intention to reuse the baseline photography where possible (p21 of Scoping Report). However we advise that the new photography and visualisations should fully comply with our most recent guidance on visual representation. We would ask that the applicant reads our comments on the previous application's LVIA (at pages 11 and 12 of our March 2015 consultation response), and addresses these issues, including our advice relating to the quality of submitted visuals.	This request was discussed in detail during a meeting held on 1/2/2018. The meeting confirmed the agreement of Argyll and Bute Council, ECU, and SNH to the proposed scope of the LVIA and viewpoint assessment. Minutes were circulated after the meeting	
	We note discussion in the Scoping Report (p23) about how visualisations will be prepared for comparative purposes. However we would like to defer comment on this, and would welcome further opportunity to discuss this aspect in light of any decision which ECU makes on the assessment baseline issue.	Noted		
	We note (p23 of Scoping Report) the intention to visualise the proposed development with forestry up to 10m in height. We are content with this, although we would note that this is the maximum height that forestry will reach before felling and restocking, and in reality the height of trees will typically be lower, and more of the proposed turbine towers may typically be exposed.	Noted		
Ornithology	We are content with the updates that are proposed for the bird survey. The extensive previous surveys of much of this area do provide supporting context. We will need clarification on vantage point survey and collision risk modelling though. We are happy with re-analysis of the 2014 ES data provided that the applicant can reassure us that they can account for the increase in turbine dimensions.	The assessment includes the Tangy III baseline data (April 2012 to March 2014) in the updated collision risk modelling. See Chapter 9: Ornithology.		

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response
			<p>The previous ES referred to height bands of <20m, 25-125m, and >125m being used to record flights. As the proposed turbine tips will be up to 150m we need to be sure that the assessment can account for this. If there has just been recording of everything >125m (and birds could be very high - well above 150m) then it will be difficult to re-analyse the data. In that case we may have to request further vantage point work.</p>	<p>As noted by SNH, these original baseline data were collected using height bands 0-20m, 21-125m and >126m. In order to account for the increase in upper tip height to 150m the revised collision risk modelling makes the precautionary assumption that all flights recorded in the >126m height band were below 150m (i.e. all the flights recorded in the upper band have been considered at potential collision height).</p> <p>An additional year of flight activity surveys (September 2016 to November 2017) was also gathered using the same agreed vantage point locations. Flights were recorded using revised height bands in order to account for the higher turbine heights (0-20m, 21-40m, 41-100m, 101-150m, >151m). In addition to estimating collision risk, these data will be compared with the original baseline data to provide context for the precautionary assumption about flights recorded above 126m in the original data.</p>
			Based on the new appraisal we will provide updated advice on the Kintyre Goose Roosts Special Protection Area (SPA) Kintyre Goose Roosts Ramsar site and Kintyre Goose Lochs Site of Special Scientific Interest (SSSI).	Noted
		Ecology	<p>The bat survey data for this site is from 2013 so is four years old. However, the record of the high risk species, Leisler's bat, only consists of two registrations (one possible and one probable), so we would be content that further survey is not necessary. There was a high level of pipistrelle registers and this would indicate that standard buffering, together with a period of post-construction survey to ascertain the need for a curtailment regime, is likely to be necessary. We can provide further advice on this aspect in due course (for example, in light of any new guidance on bats and wind turbines).</p> <p>Our March 2015 response advised that, as badgers could be affected by the proposal, there should be the provision of a more specific badger protection plan before determining any application. Please note that this is not something that we advised should be secured via a planning condition. This aspect should therefore be addressed at application stage. See the related detailed advice in our March 2015 response.</p> <p>Our March 2016 response included an objection subject to conditions related to Tangy Loch SSSI. This advice should be fully taken on board in any schedule of mitigation presented for the new proposal.</p>	<p>Standard buffering detailed in Section 10.6.41 and 10.6.42 of EIAR Chapter 10: Ecology and Nature Conservation, respectively. An outline post-construction monitoring programme is provided in Technical Appendix 10.6:Habitat Management Plan although no significant effects are predicted on bat species.</p> <p>Badger protection plan provided in Technical Appendix 10.5: Badger Protection Plan.</p> <p>Provided in Section 10.6.29 and 10.6.40. Further assessment of peat stability and protection measures detailed in Chapter 11: Geology, Soils and Peat and Technical Appendix 11.1: Peat Stability Risk Assessment.</p>
		Decommissioning	We refer the applicant to our 'general scoping and pre-application advice' note at http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/general-advice-and-information/ which provides advice on other considerations which should be taken into account in the ES. For example, it includes a link to our guidance ⁴ which recommends that it is best practice to produce an outline decommissioning and restoration plan for the proposal itself at the application stage.	General details of decommissioning intentions are set out within EIAR Chapter 5: Description of Development. Decommissioning have also been reviewed as part of the EIA process and are referred to within each EIA technical chapter, as relevant.
	25/01/2018	Viewpoint and Visualisation	<p>Receipt of 'Further information on the LVIA' (15 December 2017) relating to information requested in Scoping Opinion.</p> <p>Photography should be produced fully in accordance with current guidance</p> <p>SNH welcome the addition of the new Westport Beach viewpoint and reiterate request viewpoint from the Machrihanish Dunes golf course club hut at NR659242.</p>	<p>All photography and visualisations comply with current visualisations guidance.</p> <p>Westport Beach (VP26) and Machrihanish Dunes (VP27) included.</p>
	07/02/2018	Visualisation	'RE: Tangy IV - water based views' Existing single frame images can be used and labelled with dates and indication that images are provided for context.	Single frame photographs used (VPs 4, 16, 24) and labelled appropriately.
	10/04/2018	Visible Lighting Assessment	'RE: Tangy lighting' Additional information received confirming existing Tangy I and II lights and proposed Tangy IV lights. Draft approach to Lighting Assessment (sent 8th March 2018) should be followed. Further consultation advice can be provided, following ZTV production and fieldwork.	Comments and draft approach taken on board. Further consultation conducted and Assessment of Visible Lighting Effects scoped out as a result.
	04/06/2018	Visible Lighting Assessment	'RE: Tangy IV - s36 Assessment of Visible Turbine Lighting Effects' Information received to consult on scoping out of Assessment of Visible Lighting Effects. "...on the basis of the information presented, it seems unlikely to us that significant effects would occur".	Assessment of Visible Lighting Effects scoped out, as per ECU email.
Historic Environment Scotland (HES) (AMN/16/SA; 3000020265)	26/05/2017	Scoping	We are generally content with the overall methodology set out in the Scoping Report. We welcome that potential setting impacts will be scoped in to the assessment.	Noted
			We recommend that a ZTV should be used in the first instance to assist in establishing which historic environment assets should be assessed in the ES. However, we would note that even where a detailed ZTV indicates that no intervisibility would be possible from any such assets identified, the potential may remain for turbines to appear in the background of key views towards these assets, and this should be considered as part of the assessment. We welcome the reference to our updated Managing Change guidance note on setting and recommend its use when assessing setting impacts.	ZTV provided by the Developer (February 2018) and used as basis for selecting assets for assessment. Copies of ZTV can be found in Figure 8.1.1 and Figure 8.1.2 (Volume 3a: Figures)
			We note that the scoping report in section 6.4 quotes from the Argyll & Bute Council planning officer's report to committee for the 2014 planning application, regarding the difficulty in accessing certain monuments. However, Historic Environment Scotland (HES) would note that the updated setting guidance note states that, "Whether or not a site is visited does not change its inherent value, or its sensitivity to alterations in its setting. This should be distinguished from the tourism, leisure or economic role of a site. Tourism and leisure factors may be relevant in the overall analysis of the impact of a proposed development, but they do not form part of an assessment of setting impact." The setting guidance note also states that "sites need not be visually prominent to have a setting".	Noted
		Background	Our predecessor body, Historic Scotland (HS), did not object to the 2014 planning application, although we did not agree with the conclusions reached in the assessment on 2 scheduled monuments, Killocraw cairn 450m ESE of (SM 3664) and Tangy Loch, fortified dwelling (SM 3180). HS stated that the proposed wind farm would have a significant adverse effect on the setting of both assets and suggested that these effects could be reduced by the relocation or removal of 3 turbines from the scheme.	Noted - see assessment provided in Chapter 13: Cultural Heritage
		Cultural Heritage (Direct Impacts)	I can confirm that there are no scheduled monuments, category A listed buildings, Inventory battlefields, Inventory gardens and designed landscapes or World Heritage Sites within the proposed development site.	Noted
		Cultural Heritage (Indirect Impacts)	<p>The following heritage assets are in the vicinity of the development, and have the potential to be impacted by it. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance. It is important to note that some assets have settings that are particularly sensitive to impacts, and the likely sensitivity of the setting should be used to help determine which sites are assessed in more detail in the Environmental Statement (ES).</p> <p>Where significant impacts are predicted, we welcome further consultation to discuss site layout, design and mitigation. It would be helpful if the analysis in the ES contained appropriate visualisations such as photomontage and/or wireframe views of the development in relation to the sites and their settings for those assets where significant impacts are predicted.</p> <p>We would recommend that the developer focus their assessment on the following assets:</p> <ul style="list-style-type: none"> • Killocraw, cairn 450m ESE of (SM 3664) Given the increased height of the turbines HES recommend that careful consideration should be given to the potential impacts to the setting of this monument and potential mitigation by design. • Tangy Loch, fortified dwelling (SM 3180) Given the increased height of the turbines HES recommend that careful consideration should be given to the potential impacts to the setting of this monument and potential mitigation by design. <p>Other scheduled monuments which should also be assessed include:</p> <ul style="list-style-type: none"> • Killocraw, cup marked stone 800m E of (SM 209) • Killocraw, fort NW of (SM 3066) • Dun Fhinn, dun 300m W of Killocraw (SM 3663) • Putechantuy, dun (SM 3224) • Bellochantuy, dun (SM 3062) • Port a' Chaisteil, dun 505m SSW of Tangy Lodge (SM 3273) • Port nam Marbh, dun W of Drumalea (SM 3274) • Westport, fort 240m N of (SM 3274) • Largiemore, fort NE of (SM 3063) • Tangy Loch, fortified dwelling (SM 3180) • Skeroblin Hill, cairn (SM 3108) • Ranachan Hill, fort (SM 2064) 	<p>ZTV provided by the Developer (February 2018) and used as basis for selecting assets for assessment. Copies of ZTV can be found in Figure 8.1.1 and Figure 8.1.2 (Volume 3a: Figures)</p> <p>Detailed reassessment of these assets undertaken. Visualisation Figures are included as shown below in Volume 3b: Visualisations:</p> <ul style="list-style-type: none"> • Killocraw, Cairn - figure 13.3.3 • Tangy Loch, fortified dwelling - figure 13.3.1 & 13.3.2 • Killocraw, cup marked stone - figure 13.3.4 • Killocraw, fort - figure 13.3.5 • Dun Fhinn, dun - figure 13.3.6 • Putechantuy, dun - figure 13.3.7 • Bellochantuy, dun - figure 13.3.8 • Port a' Chaisteil, dun - figure 13.3.9 • Port nam Marbh, dun - figure 13.3.10 • Westport, fort - figure 13.3.11 • Largiemore, fort - figure 13.3.12 • Skeroblin Hill, cairn - figure 13.3.13 • Ranachan Hill, fort - figure 13.3.14 <p>Settings assessment carried out in consideration of Historic Environment Scotland Managing Change in the Historic Environment: Setting (2016). Detailed assessment of setting of each asset undertaken.</p>
		Cultural Heritage (Cumulative Impacts)	There are other proposed wind farms within the surrounding area. We would recommend that the potential cumulative impacts of the proposed development in combination with other developments in the vicinity be assessed. This should assess the incremental impact or change when the proposal is combined with other past, present and reasonably foreseeable developments.	Cumulative effects assessed on an asset by asset basis.

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response	
Internal Scottish Government Advisors					
Transport Scotland John McDonald (SCT6884)	22/05/2017	Transport & Access (Access Strategy)	The Scoping Report (SR) indicates that site access will continue to be taken from Tangy Mill Road (Unclassified). As Tangy Mill Road makes up part of the local road network, this is a matter for Argyll & Bute Council and we would make no further comment regarding the access point itself. With regard to abnormal loads, it is proposed that, as per the previous ES, turbine components would be transported from Campbeltown Harbour via the A83(T) and minor roads to the site.	Noted	
		Transport & Access (Scope of Assessment)	As the proposal includes a larger turbine model to that assessed in the previous ES, we understand that an updated swept path analysis study will be undertaken and we can confirm that Transport Scotland would wish to review the outcome of this study. In addition, a detailed Traffic Management Plan (TMP) will be produced prior to the commencement of construction works. The TMP would provide detail of materials, plant, equipment, components and labour required on site during the construction and operation phases of the development. This is welcomed.	Swept Path Analysis is presented in Appendix 15.1: Abnormal Load Route Assessment TMP can be found as Appendix 15.2	
			As all other elements of the proposal remain unchanged from the consented application, the SR indicates that it is proposed to scope out any assessment of environmental impacts on the local and trunk road network. Transport Scotland considers this to be an acceptable approach.	Noted. Assessment of transport and traffic baseline and potential significant effect can be found in EIAR Chapter 15: Access Traffic and Transport	
Marine Scotland Dr Emily Bridcut (FL41-7)	26/05/2017	Water Quality and Fisheries	MSS advises the developer to carry out up to date site characterisation surveys of the watercourses potentially impacted by the proposed development. These surveys (hydrochemistry to include turbidity and flow data, and fish populations-the presence and abundance of fish species) can inform an assessment of the potential impacts on the water quality and fish populations, a requisite of the EIA regulations, and allow appropriate site specific mitigation measures (e.g. buffer zones around all watercourses, avoidance of deep peat, use of floating roads where peat deposits exceed 1m depths, removal of all felled material within and around watercourses, the design of watercourse crossings to consider unrestricted movement of fish and flooding events, stockpiling of soils away from watercourses, drainage plans to adhere to SuDS principles) and monitoring programmes, if required, to be drawn up. Further information is available in our scoping guidelines and generic monitoring programmes http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren . We suggest the developer to contact the Argyll Fisheries Trust, if not already done so, regarding information on local fish populations. We welcome the intention of the developer to carry out a water quality monitoring programme to be outlined in the CEMP. We recommend the suite of hydrochemical parameters to include dissolved organic carbon (DOC), phosphates and nitrates as a measurement of nutrient leaching from the proposed felling in the north of the development site. A full list of hydrochemical parameters is outlined in our generic monitoring guidelines at the above web site. Macroinvertebrate sampling is further recommended as an additional means of water quality sampling. An appointed Ecological Clerk of Works (ECoW) should carry out all proposed monitoring work, in addition to regular visual inspections of all watercourses, particularly those downstream of repowering/construction works, where traffic is frequenting and during and after periods of heavy precipitation. The potential cumulative impact of the present proposal and adjacent wind farms on water quality and fish populations should be considered throughout the proposal and in the selection of control sites in the proposed monitoring programmes. In summary, MSS advises the developer to carry out the following and present full details in the ES: • up to date site characterisation surveys of the water quality and fish populations of watercourses within and downstream of the proposed development area; • draw up appropriate site specific mitigation plans; and • establish a robust integrated water quality and aquatic biota monitoring programme before, during and after the construction, repowering and redevelopment period.	As infrastructure and construction compounds are located outwith a 50m watercourse buffer (with the exception of watercourse crossings) and robust water protection mitigation measures are included within the Schedule of Mitigation and CEMP, additional surveys are not proposed at this time. A commitment has been made for pre-construction, construction and post-construction monitoring. Fish populations are discussed in Chapter 10: Ecology of this EIA Report. CEMP can be found as Appendix 5.1	
				Cumulative Impact Assessment have been reviewed as part of the EIA process and are referred to within each EIAR technical chapter, as relevant.	
				Although the fish surveys were undertaken in 2013, the habitat is considered to remain unchanged since these were completed. Brown trout <i>Salmo trutta</i> were the only species recorded within the proposed development. As the unchanged habitats are likely to support a similar population recorded during the previous surveys, the previously developed mitigation is considered to remain valid and the surveys have not been updated.	
Non Statutory Consultees					
Forestry Commission Scotland (FCS) Elaine Jamieson Policy & Support Officer - Argyll	24/05/2017	Scoping	FCS has changed its generic scoping opinion since the previous consent for this project was granted by Argyll and Bute Council in 2015. The scoping information is more concise and this new version should be used by the applicant in preparing the revised Environmental Statement (ES). In particular we note that the revised application increases the tip height of the proposed turbines, in light of this: • There should be more scope to phase, or reduce the scale of felling on the site • It should be possible to increase the maximum top height of the restock above 10m. FCS are content with the proposed EIA approach. However, we note that forestry has not been included in the scope of the assessment. The Environmental Statement should include a stand-alone chapter on 'Woodland management and tree felling'.	Forestry assessment is covered in EIAR Chapter 16: Land-use, Socio-economics and Recreation. It is noted that the forest replanting design is based on key holes, determined by good practice guidance for protecting bats. Forestry assessment is covered in EIAR Chapter 16: Land-use, Socio-economics and Recreation	
		Forestry	There is a strong presumption in favour of protecting Scotland's woodland resources. For this reason the Scottish Government published a policy on control of woodland removal in 2009 (refer Scottish Planning Policy paragraph 218). The policy aims protect the existing forest resource in Scotland and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with development, a proposal for compensatory planting may form part of this balance. The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the policy on control of woodland removal. These should be taken into account when preparing the development plans for a wind farm proposal. Beyond this, applicants should refer to guidance documents issued by Forestry Commission in relation to good forestry practice, sustainable forest management and associated environmental issues.	EIAR Chapter 16: Land-use, Socio-economics and Recreation provides an assessment of the forestry baseline and potential significant effects. This includes analysis of current planning policy and guidance.	
		Woodland Management and tree felling	The first consideration for the developer should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Design approaches which reduce the scale of felling required to facilitate the development should be considered and integration of the development with the existing woodland structure is a key part of the consenting process. Where a developer intends to construct a windfarm within a forest, partially within a forest, or that will affect the forest environment, it is important that pre-application discussions takes place with Forestry Commission Scotland (FCS), the planning authority and other relevant key agencies, at the earliest possible stage of the project, to ensure all parties have a shared understanding of the nature of the proposed development, information requirements and the likely timescale for determination. This collaborative approach will ensure that all forestry issues are identified and mitigated at the earliest opportunity. The developer should consider the potential cumulative impact of the proposed development in respect to the local and regional context. This should include consideration of potential cumulative impact of proposed woodland removal, when considering existing development in the surrounding woodland. In particular consideration needs to be given to the implication of felling operations on such things as habitat connectivity, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans. The Environmental Statement should include a stand-alone chapter on 'Woodland management and tree felling' that describes and recognises the social, economic and environmental values of the forest and the woodland habitat and take into account the fact that, once mature, the forest would have been managed into a subsequent rotation, often through a restructuring proposal that would have increased the diversity of tree species and the landscape design of the forest. The chapter should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The baseline should be prepared from existing records, site surveys and aerial photographs. The chapter should clearly indicate proposed areas of woodland for felling to accommodate new turbines, access roads and other infrastructure. Details of the area to be cleared around those structures should also be provided, along with evidence to support the proposed scale and phasing of felling. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme. The felling plan should clearly identify which areas are to be felled and when. Trees cleared for turbine bases, access roads and any other wind farm related infrastructure must be replaced by replanted on-site or on an alternative site (compensatory planting). The restocking plan should show which areas are to be replanted and when during the life of the windfarm. The plan should clearly identify and describe the restocking operations including changes to the species composition, age class structure, timber production and traffic movements. Integration of the windfarm into future forest design plans is a key part of the development process. Applicants are therefore advised to prepare a Long Term Forest Plan, alongside their Environmental Statement, that provides a strategic vision to deliver environmental benefits through sustainable forest management and describes the major forest operations over a 20 years period. Such a plan should be presented to the planning authority, as a technical appendix as part of the Environmental Statement, for context.	The Long Term Forest Plan is compliant with UK Forestry Standard. Further detail is provided in EIAR Chapter 16: Land-use, Socio-economics and Recreation. Cumulative Impact Assessment have been reviewed as part of the EIA process and are referred to within each EIAR technical chapter, as relevant. EIAR Chapter 16: Land-use, Socio-economics and Recreation provides an assessment of the forestry baseline and potential significant effects.	
				Restocking plans are discussed in EIAR Chapter 16: Land-use, Socio-economics and Recreation and shown in Figure 16.2 (Volume 3a: Figures)	
				Long Term Forest Plan (LTFF) prepared for FCS agreement. LTFF is submitted as Appendix 16.1. The LTFF will be showing a 20 year period. Further detail is provided in EIAR Chapter 16: Land-use, Socio-economics and Recreation.	
				FCS has been consulted at scoping	
				EIAR Chapter 16: Land-use, Socio-economics and Recreation provides an assessment of the forestry baseline and potential significant effects. This includes analysis of current planning policy, guidance and best practice.	
				Discussions of mitigation can be found in EIAR Chapter 19: Schedule of Mitigation; Appendix 5.1: CEMP; and Appendix 10.6: Habitat Management Plan	

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response
BT Dale Aitkenhead (WID)	08/05/2017	Scoping	The project should not cause interference to BT's current and presently planned radio networks	Noted
Glasgow Prestwick Airport Jeanette Graham	18/05/2017	Scoping	The Glasgow Prestwick Airport safeguarding team has reviewed the scoping report and can confirm that the increased tip heights to 150m does not conflict with our safeguarding criteria and as such we do not object to the revised development.	Noted
Joint Radio Company	02/05/2017	Scoping	No links affected. This proposal cleared with respect to radio link infrastructure operated by: the local electricity utility and Scotia Gas Networks.	Noted
Defense Infrastructure Organisation (DIO) Claire Duddy (DIO/SUT/43/10/1/21836)	22/05/2017	Scoping Aviation	The MOD has no objection to the proposal. In the interests of air safety the MOD will request that the development should be fitted with MOD accredited 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. The principal safeguarding concern of the MOD with respect to the development of wind turbines relates to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations. 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. If planning permission is granted we would like to be advised of the following prior to commencement of construction: • The date construction starts and ends; • The maximum height of construction equipment; • The latitude and longitude of every turbine This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area. If the application is altered in any way we must be consulted again as even the slightest change could unacceptably affect us.	Noted Visible lighting, as agreed with HIAL, will be included on cardinal turbines. Further consultation conducted and Assessment of Visible Lighting Effects scoped out as agreed with . EIA Chapter 18: Aviation provides an assessment of the aviation baseline and potential significant effects. DIO has been consulted at scoping. Details of constructions can be found in EIA Chapter 5: Description of Development and Appendix 5.1: CEMP
Royal Society for the Protection of Birds (RSPB) Scotland	26/05/2017	Ornithology Ornithology (Designated Sites and EIA Consideration) Ornithology (Cumulative Impacts) Habitat Management/Mitigation Consultation Carbon Calculator	RSPB Scotland advises that the modified proposal has potential to impact on a number of species of birds of conservation concern, particularly Greenland white-fronted goose (GWFG), hen harrier and diver species (listed in Annex 1 of the EU Birds Directive). The scoping report states that the assessment will reuse data from 2012-2014 surveys used to assess impacts from the original Tangy III proposal. We would advise that this approach is largely acceptable - if the data is still valid and applicable. The ES should provide evidence and justification that this is the case. However, notwithstanding this, given that 3-4 breeding seasons have occurred between the survey date and this application, we advise that updated breeding bird survey work is undertaken for priority breeding species (hen harrier and red-throated diver). We are unsure how the vantage point (VP) data was recorded and if this allows for a remodelling of predicted collision rates based upon the new turbine heights. If not then new VP surveys should ideally be undertaken. The proposed wind farm site is outwith any designated site but is close (c. 200m) to the Kintyre Goose Roosts Special Protection Area (SPA), designated for GWFG. It is possible that birds from the SPA will overfly this area. Sufficient information must be provided with the application to enable a Habitats Regulations Assessment (HRA) to be undertaken in order to comply with the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). It appears that there has been a decline in usage of Tangy Loch as a roost site. The decline of use is obviously of concern given the requirements under Article 6 of Directive 92/43/EEC (the 'Habitats Directive') to maintain favourable conservation status of the SPA. We would welcome consideration of any offsite initiatives for GWFG as part of a wider area management plan. We advise that a more precautionary approach is applied with a minimum set back distance of 1km for turbines from GWFG roost lochs. Usage of such sites is likely to change over time and it will also allow for greater low visibility and night flights variance especially since no nocturnal radar surveys have been undertaken. In regards to hen harrier, we would advise that the EIA should assess potential future use of the restructured forestry and open ground especially around turbines since draw in and collision are distinct possibilities. Although no black grouse were recorded, data should be sought from FCS and we advise that turbines should not be located within 400m of a known lek site. An assessment of cumulative bird impacts in relation to other projects with development consent, or in the planning system, within this Natural Heritage Zone (NHZ) should be undertaken (in accordance with SNH guidance 'Assessing the Cumulative Effects of Onshore Wind Energy Developments' 2012). The ES should include details of proposals for mitigation/enhancement in relation to important habitats and species on this site. We would expect mitigation to include timing constraints within sensitive breeding periods and for roost loch usage by GWFG throughout the construction period. This should include avoiding the use of any works related lighting. Mitigation during operation should include lighting which will not attract geese/birds during night-time flights – so either no turbine lights or ones which are intermittent to reduce attraction. We request further consultation in regards to the long-term forest plan and any compensatory planting associated with this proposal. We advise that these should consider measures to enhance forest biodiversity through increased provision of native tree species/open space. Compensatory planting should be seen as opportunity to deliver priority biodiversity habitats and achieve aims within the Argyll and Bute Woodland and Forestry Strategy. We would welcome the restoration of suitable areas to bog/peat and increased planting of native tree species in suitable areas within and surrounding the site for biodiversity gain. Ideally, any off- or on-site compensatory planting required should be included as part of the ES so the impacts can be assessed. A detailed Habitat Management Plan (HMP) should be submitted with any application this should contain detailed ecological justification for any proposals. We would advise that the Argyll Raptor Study Group (ARSG) should be contacted in relation to potential new data for this area. We also advise that carbon calculations for the proposal should be based on the latest version of the Scottish Government's carbon calculator and should clearly show the carbon payback period for the proposed scheme.	EIA Chapter 9: Ornithology provides an assessment of the ornithology baseline and potential significant effects. Surveys during the 2017 breeding season included updated surveys for breeding waders and scarce breeding birds (including but not limited to hen harrier and red-throated diver). Details can be found in EIA Chapter 9: Ornithology Sufficient information has been included in the assessment presented in EIA Chapter 9: Ornithology (Section 9.6) to allow for an HRA to be undertaken. As previously for the Tangy III design, the closest turbine to Tangy Loch (Turbine 5 for the Tangy IV Development), is 1 km away. Comments considered in EIA Chapter 9: Ornithology (Paragraphs 9.5.43 to 9.5.53) No turbines are within 400 m of the two black grouse leks located (EIA Chapter 9: Ornithology paragraph 9.5.11). Cumulative assessment undertaken in line with SNH 2012 guidance (EIA Chapter 9: Ornithology, paragraphs 9.6.63 to 9.6.77). Mitigation presented in EIA Chapter 9: Ornithology (Paragraph 9.6.23). A review by Prof. Bob Furness on artificial lighting and the potential impacts on birds is also discussed in Appendix 9.1: Ornithology Annex F. Habitat mitigation discussed in EIA Chapter 10: Ecology and Nature Conservation (Section 10.6.34 and 10.6.35) regarding reinstatement, restoration and regeneration, particularly of peatlands. Compensatory planting for the removal of coniferous plantation is detailed in Chapter 16: Land-use, Socioeconomics and Recreation. Technical Appendix 10.6: Habitat Management Plan, proposes measures for broadleaved woodland creation and peatland restoration as part of the compensatory planting obligations. See EIA Chapter 9: Ornithology for details of data used in assessment. Carbon Calculator can be found in Appendix 5.2.

Consultee Name	Date	Topics Raised	Environmental Information Requested	Applicant Response
Scottish Water	22/05/2017	Scoping	We have reviewed the updated scheme and have no further comments to add to the previous response to the Tangy III proposal. Previous response: •Requested consideration of potential impacts on Drinking Water Protected Areas and public water supply intakes in the area, notably Glen Lussa Water catchment. •A distribution main runs alongside the A83 and the access roads for the site. Protection measures should be implemented to ensure it is protected.	These intakes were assessed in the Tangy III ES (2014). Temporary and permanent infrastructure is not located within the respective drinking water catchments and impacts effects are negligible. The distribution mains location shall be confirmed and appropriate measures agreed with Scottish Water for crossing the asset or other works in close proximity to avoid damage.
Fisheries Management Scotland (FMS) Brian Davidson	15/05/2017	Scoping	FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal. The proposed development falls within the district of the Argyll District Salmon Fishery Board, and the catchments relating to the Argyll Fishery Trust. It is important that the proposals are conducted in full consultation with these organisations (see link to FMS member DSFBs and Trusts below). We have also copied this response to these organisations.	The proposed development infrastructure and construction compounds are located outwith a 50m watercourse buffer (with the exception of watercourse crossings) and robust water protection mitigation measures are included within the Schedule of Mitigation and CEMP. Argyll District Salmon Fisheries Board consulted during scoping Fish populations are discussed in Chapter 10: Ecology of this EIA Report.
		Fisheries	Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.	Fish populations are discussed in Chapter 10: Ecology of this EIA Report.
WoSAS	28/01/2018	Cultural Heritage	Agreed that the main consideration would be the extent to which the effects of the Development on the setting of the assets in the surrounding area may be changed by installing taller turbines. Requested that ES look in detail at changes to the ZTV as more turbines would potentially be visible from each asset and also across a wider area.	EIAR Chapter 13: Cultural Heritage considers potential changes to setting of the assets which would result from taller turbines. Detailed analysis of updated ZTV undertaken with reference to heritage assets
Argyll District Salmon Fisheries Board	No response received			No response required.
Civil Aviation Authority - Airspace	No response received			No response required.
The Crown Estate	No response received			No response required.
NATS Safeguarding	No response received			No response required.
Mountaineering Council of Scotland	No response received			No response required.
Visit Scotland	No response received			No response required.
John Muir Trust	No response received			No response required.
Scottish Wildlife Trust	No response received			No response required.
BAA (Glasgow Airport)	No response received			No response required.
Highlands and Islands	No response received			No response required.
Nuclear Safety Directorate	No response received			No response required.
Scottish Rights of Way and Community Councils	No response received			No response required.
West Kintyre Community Council Margaret Pratt	25/05/2017	Cumulative Impact	we would wish to ensure that the cumulative effect of the windfarms of Auchadaduie, (consented), Creggan and Blary Hill Windfarms, Glen Barr both currently awaiting decision by the Ministers following appeal hearings held in January 2016) were included in any photographic or wire frame depictions and in the EIA statement when produced. These three windfarms are all in close proximity to the proposed development and to those of Beinn an Tuirc 1, 11, & 111 (operational). We further comment that since the original planning permission for 15 turbines of 125m to tip was approved for Tangy 111 two other windfarms on the peninsula have now become operational, namely Cour and Freasdail.	Cumulative Impact Assessment have been reviewed as part of the EIA process and are referred to within each EIAR technical chapter, as relevant. Cumulative Sites within 60km is shown in Figure 8.4 (Volume 3a: Figures) including those mentioned, except Creggan Wind Farm which has been refused
		Ornithology	with the proposed increase in height of the turbines to that of 150m to tip we feel it is essential re-assess the possible effect to the Greenland White fronted geese and their roosts.	Surveys during the 2017 breeding season included updated surveys for breeding waders and scarce breeding birds (including but not limited to hen harrier and red-throated diver). Details can be found in EIAR Chapter 9: Ornithology
		Tourism	Tourism is a major driver of the local economy on the peninsular and of importance is the long-distance walk known as The Kintyre Way. We believe that to use the research contained within the document "The Economic Impact of Windfarms on Scottish Tourism" a report for the Scottish Government (Glasgow Caledonian University 2008) is unacceptable due to this research having been done many years ago when Windfarms were few and far between and therefore could have been construed more of a novelty by those tourists surveyed. We believe a more robust assessment of the impact within this area should be undertaken incorporating the views not only of the Scottish Tourist Board, but also those of the Mountaineering Association of Scotland, The Ramblers Association and other such outdoor activity specialists.	Literature review in Effects on Tourism/Recreation Assets completed and presented in EIAR Chapter 16: Land-use, Socio-economics and Recreation Visit Scotland, Mountaineering Association of Scotland and ScotWays have been consulted. However, we have not received any response from Mountaineering Association of Scotland nor from ScotWays.
		Transport and Access	We accept traffic surveys were carried out in 2014 but believe further surveys should be carried out, more especially because there is a strong likelihood that more than one windfarm will be under construction within the area at the same time resulting in a significant increase in the use of HGV's on the A83 which is the only road we on West have for all aspects of daily living, public transport and deliveries etc.	EIAR Chapter 15: Access Traffic and Transport provides an assessment of the traffic and transport baseline and potential significant effects, including cumulative effects.
Campbeltown Community Council	No response received			No response required.
East Kintyre Community Council	No response received			No response required.
Southend Community Council	No response received			No response required.
The Laggan Community Council	No response received			No response required.
Additional Consultees Tangy IV				
CSWind UK	No response received			No response required.
Machrihanish Airbase Community Company	No response received			No response required.
South Kintyre Development Trust	No response received			No response required.
The Long and Winding Way Ltd.	No response received			No response required.