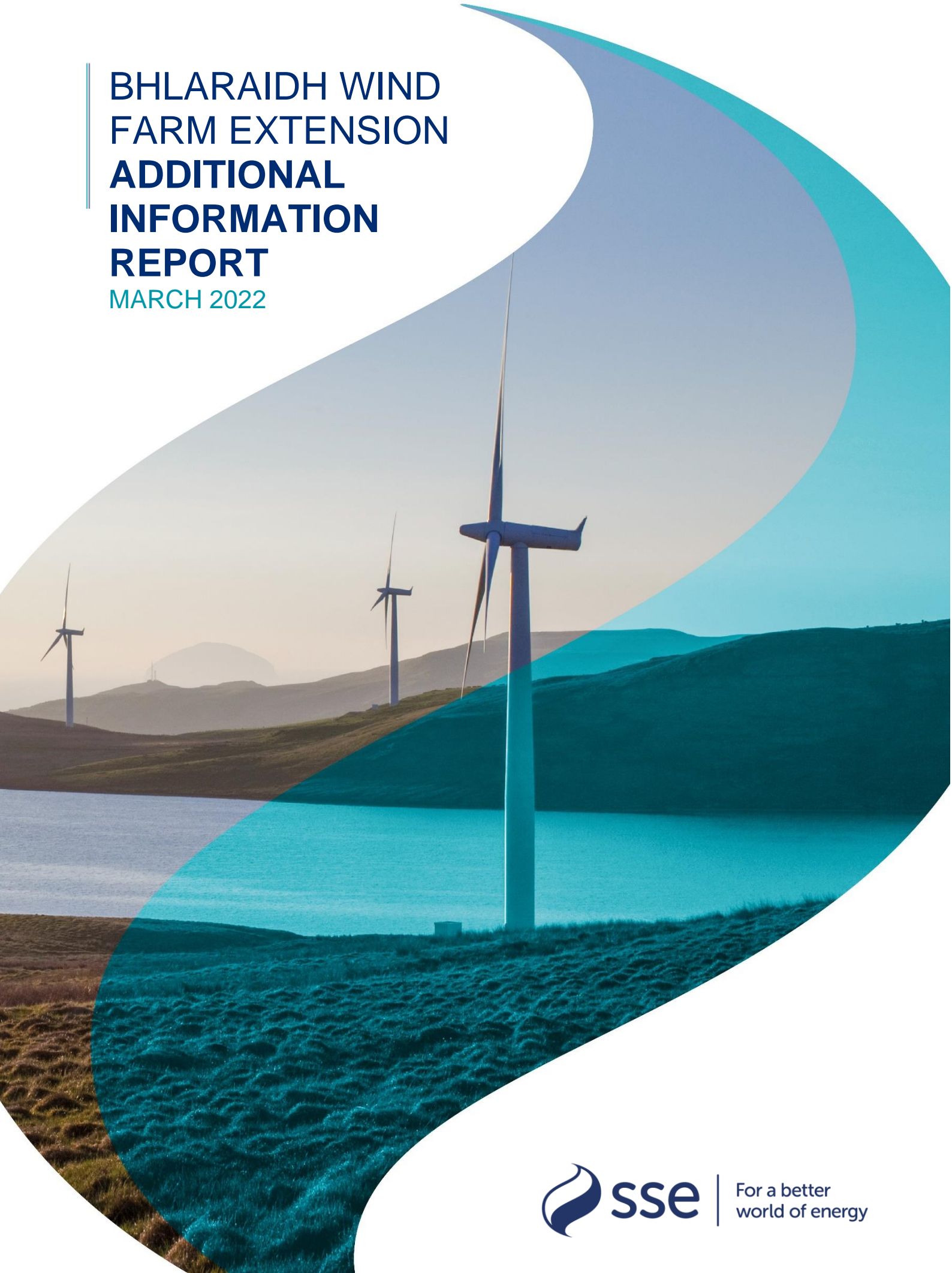


**BHLARAI DH WIND
FARM EXTENSION
ADDITIONAL
INFORMATION
REPORT**
MARCH 2022



Additional Information Report

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1 Introduction

1.1 Background

- 1.1.1 SSE Generation Limited (hereafter referred to as ‘the Applicant’) submitted an application in August 2021 to the Scottish Ministers under Section 36 of the Electricity Act 1989 for consent, together with a direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 for deemed planning permission to be granted, to construct and operate Bhlaraidh Wind Farm Extension, an extension to the operational Bhlaraidh Wind Farm. The application sought consent for a generating station consisting of a wind farm with up to 18 wind turbine generators with a maximum tip height of up to 180m, supported by ancillary development (the ‘18 turbine Proposed Development’).
- 1.1.2 The Section 36 application was supported by an Environmental Impact Assessment Report (EIA Report) as required by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the EIA Regulations), which assessed the environmental impacts of the 18 turbine Proposed Development.
- 1.1.3 The consultation response received from The Highland Council (THC) dated 15 February 2022 raised no objection to the application subject to the removal of three turbines (T13, T14 and T18) from the 18 turbine Proposed Development. The Applicant has therefore removed the three turbines and associated infrastructure, thus creating a ‘15 turbine Proposed Development’.
- 1.1.4 Unless otherwise defined in this report, defined terms have the meaning ascribed to them in the Glossary of Terms included with the Bhlaraidh Wind Farm Extension EIA Report.

1.2 Purpose of Report

- 1.2.0 The Applicant has prepared this report with respect to the changes, where relevant, to matters dealt with in the EIA Report. This has been done in the expectation that Scottish Ministers will treat the report as Additional Information under the EIA Regulations. The purpose of the Additional Information Report (AIR) is to identify and assess the changes (or lack thereof) to the likely significant effects reported in the EIA Report, as a result of the removal of T13, T14 and T18 and associated infrastructure.
- 1.2.1 Details of the changes from the 18 turbine Proposed Development to the 15 turbine Proposed Development are presented in AIR Section 2: Design Iteration and Proposed Development. More detailed information regarding changes to the assessment of environmental effects is presented in AIR Sections 5-15.
- 1.2.2 The additional environmental information provided in the AIR does not replicate information previously provided, and therefore should be read alongside the EIA Report. The conclusions of the EIA Report remain valid, unless otherwise stated within this AIR (including the associated Appendices).
- 1.2.3 In accordance with Regulation 5(5) of the EIA Regulations, this AIR has been prepared by competent experts. Each of the technical AIR Sections (5-15) have been produced with input from the technical consultancies involved in the preparation of the EIA Report. This AIR has been reviewed and approved by an EIA practitioner with more than 15 years’ experience, holding relevant undergraduate and post graduate degrees, and professional membership (PIEMA). Full details of accreditations and experience can be found in EIA Report Chapter 1, Section 1.8.

1.3 Structure of the Additional Information Report

- 1.3.1 For ease of reference, this AIR follows a similar structure to the EIA Report. The AIR Section numbering corresponds to the equivalent EIA Report Chapter numbering, as follows:
- AIR Section 1: Introduction
 - AIR Section 2: Design Iteration and Proposed Development

- This provides an overview of the 15 turbine Proposed Development and describes elements of the proposals where minor necessary amendments have been made to the associated infrastructure as a direct result of the removal of T13, T14 and T18.
 - AIR Section 3: Approach to EIA
 - AIR Section 4: Planning Policy
 - AIR Sections 5 -15 summarise the changes of likely significant effects in relation to each EIA topic area and assess any changes (or lack thereof) in the significance of effects between the 18 turbine Proposed Development (as assessed in the EIA Report) and the 15 turbine Proposed Development:
 - AIR Section 5: Ecology
 - AIR Section 6: Ornithology
 - AIR Section 7: Archaeology and Cultural Heritage
 - AIR Section 8: Landscape and Visual
 - AIR Section 9: Hydrology and Hydrogeology
 - AIR Section 10: Geology and Soils
 - AIR Section 11: Noise
 - AIR Section 12: Traffic and Transport
 - AIR Section 13: Socio-Economic, Tourism and Recreation
 - AIR Section 14: Climate Change
 - AIR Section 15: Aviation and Radar
 - AIR Section 16: Schedule of Environmental Commitments
 - This provides an overview of resulting changes to the schedule of environmental commitments as presented in EIA Report Chapter 16.
 - AIR Section 17: Summary
 - This summarises the effects of the design change on the conclusions of the EIA Report and provides a review of the environmental effects as a result of the removal of the three turbines, where a difference occurs between the significant effects of the 18 turbine Proposed Development (assessed in the EIA Report) and the 15 turbine Proposed Development.
- 1.3.2 The AIR is supported by AIR Appendices 9.1, 14.1 and 14.2 and a set of AIR Figures comprising revised landscape and visual visualisations. A separate AIR Visualisations Pack of the seven viewpoints requested by THC is also provided to support the AIR.
- 1.3.3 The structure and scope of this AIR was agreed through consultation with the ECU and THC in February 2022.

1.4 Availability of the AIR

- 1.4.1 Electronic copies of the AIR can be accessed on the Scottish Government Energy Consents website at www.energyconsents.scot or on the application website at www.sserenewables.com/bhlaraidhextension.

- 1.4.2 Copies of this AIR may be obtained from SSE Generation Limited (contact: SSE Renewables, FAO Jane MacDonald, 1 Waterloo Street, Glasgow, G2 6AY or via email at jane.macdonald@sse.com) at a charge of £25 for a hard copy, or on electronic USB or DVD free of charge.
- 1.4.3 Notice of the additional information provided within this AIR has been given in accordance with Regulation 20 of the EIA Regulations. The AIR will be advertised on the application website and in the following newspapers:
- Edinburgh Gazette;
 - The Press and Journal; and
 - The Inverness Courier.

1.5 Representations to the Application

- 1.5.1 Any representations to the application should be made directly to the Scottish Government at:

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

Email: representations@gov.scot

Website: www.energyconsents.scot/Register.aspx

- 1.5.2 Any representations to the application must identify the proposal and specifying the grounds for representation. Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations.

2 Design Iteration and Proposed Development

2.1 Summary of Changes

- 2.1.1 This AIR Section provides a description of the 15 turbine Proposed Development. Figure 2.1 shows the key changes from the 18 turbine Proposed Development.

- 2.1.2 The 15 turbine Proposed Development comprises a generating station consisting of a wind farm with up to 15 wind turbine generators of up to a maximum height of 180m from ground to blade tip when vertical, supported by a number of ancillary elements as previously described in the EIA Report Chapter 2:

- crane hardstandings;
- access tracks;
- drainage;
- watercourse crossings;
- on-site substation;
- underground cabling;
- a LiDAR station;
- two construction compounds;
- a batching plant; and

- borrow pits (eight search areas).

2.1.3 The layout of the 15 turbine Proposed Development is shown on Figures 2.2 and 2.3.

2.1.4 Table 2.1 provides a summary of where the removal of T13, T14 and T18 has resulted in changes between the 18 turbine Proposed Development and the 15 turbine Proposed Development.

Table 2.1 – Summary of Key Changes between the 18 turbine Proposed Development and the 15 turbine Proposed Development

Infrastructure Element	18 Turbine Proposed Development	15 Turbine Proposed Development	Summary of Changes
No. of Turbines	18	15	Removal of three turbines.
Tip Height	Up to 180 m	Up to 180 m	No change.
Turning Heads	Eight	Eight	Overall number unchanged. The turning heads at T13 and T14 have been relocated to T17 and T16.
New Access Track Length	Approx. 10.1 km	Approx. 7.9 km	A reduction in new track length of approx. 2.2 km.
Existing Access Track Length	Approx. 13.7 km	Approx. 13.5 km	A reduction in existing track length requiring upgrading of approx. 200 m.
Total Turbine Hardstanding Area	Temporary Area of 34,578 m ² Permanent Area of 33,750 m ²	Temporary Area of 28,815 m ² Permanent Area of 28,125 m ²	Reduction in Temporary Area of 5,763 m ² . Reduction in Permanent Area of 5,625 m ² .
Borrow Pits	Up to 8 search areas	Up to 8 search areas	No change.
Lighting	No visible lighting required	No visible lighting required	No change.
Substation	New on-site substation	New on-site substation	No change.

Infrastructure Element	18 Turbine Proposed Development	15 Turbine Proposed Development	Summary of Changes
Temporary Construction Compounds	Two temporary construction compounds would be required: at the Site entrance and on the plateau	Two temporary construction compounds would be required: at the Site entrance and on the plateau.	No change.
LiDAR	A single permanent Light Detection and Ranging (LiDAR) station would be required.	A single permanent Light Detection and Ranging (LiDAR) station would be required	No change.
Concrete Batching Plant	It is anticipated that concrete batching would be undertaken on site.	It is anticipated that concrete batching would be undertaken on site.	No change.
Cross-Country Cabling	Two routes approximately 700 m and 450 m in length.	Two routes approximately 700 m and 1,200 m in length.	Extension of cross-country cabling between T15 and T16 by approx. 750 m with the removal of T14.
Watercourse Crossings	8 new access track crossings of major watercourses would be required.	6 new access track crossings of major watercourses would be required.	Reduction in two crossings of major watercourses, Allt Saigh and unnamed watercourse.

2.1.5 The turbine locations for the 15 turbine Proposed Development are unchanged from those for the 18 turbine Proposed Development. Turbine numbering has also been retained and corresponds to the numbering which was presented in the EIA Report Chapter 2: Design Iteration and Proposed Development and as shown in Table 2.2.

2.1.6 All other details of the Proposed Development, including infrastructure and outline construction, operation and decommissioning details will be as summarised in EIA Report Chapter 2. The 15 turbine Proposed Development does not necessitate any significant changes to the proposed outline construction methodology.

2.2 Turbines

2.2.1 The 15 turbine Proposed Development would see the removal of three turbines from the 18 turbine Proposed Development: T13, T14 and T18 as shown in Figure 2.1. Turbine parameters would remain unchanged.

2.2.2 The National Grid References (NGRs) for the turbines proposed for retention are presented in Table 2.2.

Table 2.2 – Turbine Grid References

Turbine Number	Easting	Northing	Elevation AOD (m)
T01	238385	821688	518
T02	238364	821034	515
T03	238925	821693	533
T04	239380	821326	498
T05	239523	822070	534
T06	238277	822170	527
T07	238704	820694	499
T08	238771	820273	507
T09	239348	820077	462
T10	239501	820920	475
T11	238876	821220	532
T12	239955	821460	515
T15	239933	820784	490
T16	239852	820120	441
T17	240372	821198	492

3 Approach to EIA

3.1 Introduction

3.1.1 The approach undertaken to complete the EIA for the 18 turbine Proposed Development was detailed in EIA Report Chapter 3.

3.1.2 EIA Report Chapter 3 confirmed that the EIA process aims to assist Scottish Ministers in their determination of the Section 36 application by identifying where significant environmental effects are predicted. It was further confirmed that the structure of the EIA Report followed the requirements of Schedule 4 of the EIA Regulations and other relevant good practice guidance.

3.2 Purpose of this AIR

3.2.1 As noted above, the Applicant has prepared this report in the expectation that Ministers will treat the report as Additional Information under the EIA Regulations. The purpose of this AIR is to

demonstrate the nature and extent of any change in the assessment of environmental impacts that would result from the proposed changes, or record where there is no change.

3.3 Methodology

- 3.3.1 This AIR identifies and assesses the changes (or lack thereof) to the likely significant effects reported in the EIA Report, as a result of the removal of T13, T14 and T18 and associated infrastructure. The scope of the AIR was agreed in consultation with THC and ECU in February 2022. The assessment methodology of the AIR is the same as reported in the EIA Report (refer to EIA Report Chapter 3 and technical Chapters 5-15).
- 3.3.2 Large sections of the EIA Report remain valid and are therefore unchanged for the AIR. Where this is the case, this information has not been replicated in the AIR, and in some instances cross-references to the EIA Report are provided to assist the reader. This AIR should therefore be read in conjunction with the EIA Report. Information on the amended technical assessments and their conclusions are further detailed within each of the technical sections of the AIR.
- 3.3.3 The only change noted to the cumulative scenario from that assessed in the EIA Report is the refusal by Scottish Ministers of Glenshero Wind Farm on 4th March 2022. Due to the distance to, and relative location of Glenshero Wind Farm to the Proposed Development, the removal of that scheme from the cumulative scenario is expected to result in a minor improvement but is not expected to change the likely significant cumulative effects as assessed within the EIA Report. The remaining cumulative data as agreed at the previous cut-off date is considered to remain valid and no updated cumulative assessment is required. Therefore, the cumulative effects identified in the EIA Report remain valid when considering the proposed removal of T13, T14 and T18 unless otherwise stated within the technical sections of this AIR.

3.4 Consultee Responses

- 3.4.1 Subsequent to the submission of the Section 36 application, responses have been received from various statutory and non-statutory consultees and stakeholders. Direct discussions have been held as appropriate between the Applicant and consultees to provide clarification and responses to queries raised.
- 3.4.2 Table 3.1 provides a brief summary of the consultation responses received to the Section 36 application. The table briefly notes the nature of the comments received and the responses provided by the Applicant (where applicable).
- 3.4.3 The response received from THC was the only one considered to necessitate a change to the Proposed Development, and therefore this is the primary focus of this AIR.

Table 3.1 Consultee Responses

Consultee	Comment	Applicant Response
Aberdeen International Airport	No comment and no requirement for further consultation.	N/A
British Horse Society	No objection.	N/A
BT	No objection.	N/A
Crown Estate Scotland	No comment.	N/A
Defence Infrastructure Organisation (DIO)	No objection subject to requested conditions of consent.	The Applicant is willing to accept the proposed conditions.

Consultee	Comment	Applicant Response
Fort Augustus & Glenmoriston Community Council	Note concerns related to public access, turbine lighting and construction traffic.	The Applicant issued a response (17 January 2022) noting concerns raised and suggesting a meeting to discuss these further.
Glenurquhart Community Council	Note concerns related to visual impacts, impacts on sensitive habitats and species, impacts on rewilding projects, and cumulative impacts.	The Applicant issued a response (14 January 2022) to address the concerns raised.
Highlands & Islands Airport (HIAL)	No objection.	N/A
Historic Environment Scotland (HES)	No objection.	N/A
Ironside Farrar	Request clarifications to the information presented in the Peat Landslide Hazard Risk Assessment.	The Applicant will issue a separate response to Ironside Farrar clarifying the matters raised.
Joint Radio Company	No objection.	N/A
Mountaineering Scotland	No comment.	N/A
NatureScot	Objection due to impacts on River Moriston SAC unless subject to appropriate conditions of consent.	The Applicant will issue a separate response to NatureScot confirming their position with regards to the condition.
NATS Safeguarding	No objection.	N/A
RSPB Scotland	Objection due to impacts on Slavonian Grebe and request a condition related to the construction timing of T13 and T18.	T13 and T18 have been removed from the Proposed Development. The Applicant will issue a separate response to RSPB Scotland clarifying this.
Scottish Environment Protection Agency (SEPA)	No objection subject to requested conditions of consent.	The Applicant is considering the proposed conditions and will, if necessary, consult further with SEPA and the ECU to reach agreement.
Scottish Forestry	No comments.	N/A
Scottish Water	No objection.	N/A
Strathglass Community Council	Objection due to visual and cumulative impacts.	The Applicant issued a response (14 January 2022) to address the concerns raised.

Consultee	Comment	Applicant Response
The Highland Council	No objection subject to the removal of T13, T14 and T18 and appropriate conditions of consent.	Layout revised to 15 turbine Proposed Development and considered within this AIR. The Applicant is considering the proposed conditions and will, if necessary, consult further with THC and the ECU to reach agreement.
Transport Scotland	No objection subject to requested conditions of consent.	The Applicant is considering the proposed conditions and will, if necessary, consult further with Transport Scotland and the ECU to reach agreement.

4 Planning Policy

4.1 Introduction

4.1.1 This Section of the AIR has been prepared to review and provide an update on published policy and guidance since the submission of the application under Section 36 of the Electricity Act 1989 (“the 1989 Act”) in August 2021.

4.1.2 Since August 2021 the relevant policy context has further evolved with the publication of the Draft National Planning Framework 4 (NPF4).

4.1.3 This AIR should be read in conjunction with EIA Report Chapter 4 and the previously submitted Planning Statement.

4.1.4 This Section is structured as follows:

- Section 4.2 considers the Draft NPF4 in the context of the Proposed Development; and
- Section 4.3 presents updated policy conclusions.

4.2 Draft National Planning Framework 4

4.2.1 The Draft Fourth National Planning Framework (Draft NPF4) was laid in Parliament on 10th November 2021. The final version of NPF4 is due to be published for approval and adoption in summer 2022. Once adopted, NPF4 will incorporate Scottish Planning Policy (SPP) and will have the status of the development plan for planning purposes.

4.2.2 It is acknowledged that Draft NPF4 is subject to ongoing parliamentary scrutiny and public consultation, and therefore it will be up to the Scottish Ministers to determine the weight to be afforded to it in reaching their decision.

Part 1 – National Spatial Strategy

4.2.3 Part 1 – National Spatial Strategy sets out a shared vision where each part of Scotland can be planned and developed to create Sustainable, Liveable, Productive and Distinctive places. The strategy places significant emphasis on supporting the transition to net zero, the recovery from Covid-19 and creating better places.

4.2.4 The 15 turbine Proposed Development can draw support from the National Spatial Strategy, including:

- Sustainable places – supports the transition to net-zero and seeks to transform the way we use buildings and land. Acknowledges the real threat and heightened risk that the climate emergency poses to the planet and the importance of investing in reducing carbon emissions.
- Productive places – supports future places which will attract new investment, build business confidence, stimulate entrepreneurship, and facilitate future ways of working – improving economic, social, and environmental wellbeing.

Part 2 – National Developments

- 4.2.5 Draft NPF4 identifies significant developments of national importance which support the delivery of the spatial strategy. Eighteen National Developments are proposed, ranging from single large scale projects or collections and networks of several smaller scale proposals. The designation as a National Development means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors. Appropriate consents and associated impact assessments are still required in line with statutory obligations.
- 4.2.6 'Strategic Renewable Electricity Generation and Transmission Infrastructure' is identified as a National Development within the Draft NPF4. Electricity generation from renewables of or exceeding 50 MW in capacity is designated as a National Development. The 15 turbine Proposed Development would therefore be classed as a National Development as it would have an estimated capacity in excess of 50MW.
- 4.2.7 The supporting text emphasises that "*a large increase in electricity generation from renewable sources will be essential for Scotland to meet its net zero emissions targets*" and has the potential to support jobs and business investment with wider economic benefits.
- 4.2.8 The identification of large renewable energy developments as National Developments further emphasises the importance of the Proposed Development in the context of emissions reductions targets.

Part 3 – National Planning Policy

- 4.2.9 Part 3 incorporates SPP and contains detailed national policy across a wide range of topics. These are grouped around the following themes:
- Sustainable Places (Universal Policies)
 - Liveable Places
 - Productive Places
 - Distinctive Places
- 4.2.10 The policies of relevance to the 15 turbine Proposed Development are outlined and assessed below.

Policy 2: Climate Emergency

- 4.2.11 Policy 2 states:
- "When considering all development proposals significant weight should be given to the Global Climate Emergency."*
- 4.2.12 Policy 2 also confirms that in decision making the scale of the contribution of the development proposals to emissions in relation to emissions reduction targets should be taken into account.
- 4.2.13 This represents the first time a planning policy document has explicitly confirmed that significant weight should be given to the Global Climate Emergency. As a result, the 15 turbine Proposed Development can draw support from Draft NPF4 Policy 2, as the updated calculations of total CO₂ emission savings and payback time for the 15 turbine Proposed Development indicates the overall payback period of a wind farm with 15 turbines with an average (expected) installed capacity of

5.6MW per turbine would be approximately 2.4 years, when compared to the fossil fuel mix (the existing energy mix within the UK) of electricity generation.

- 4.2.14 The 15 turbine Proposed Development can therefore draw support from Draft NPF4 Policy 2 and its contribution to achieving emissions reductions targets should also be viewed positively in the policy balance.

Policy 3: Nature Crisis

- 4.2.15 Policy 3 sets out that:

"Development proposals should contribute to the enhancement of biodiversity, including restoring degraded habitats and building and strengthening nature networks and the connections between them."

- 4.2.16 Additionally:

"Any potential adverse impacts of development proposals on biodiversity, nature networks and the natural environment should be minimised through careful planning and design. Design should take into account the need to reverse biodiversity loss, safeguard the services that the natural environment provides and build the resilience of nature by enhancing nature networks and maximising the potential for restoration."

- 4.2.17 The 18 turbine Proposed Development included significant provision for peatland restoration and other biodiversity enhancements which will restore degraded habitats and strengthen nature networks as set out in Policy 3. These commitments remain unchanged for the 15 turbine Proposed Development despite removal of three turbines and associated infrastructure and resultant reduction in area of habitat lost due to the smaller development footprint. As stated in EIA Report Appendix 5.7 Outline Habitat Management Plan (HMP), the Applicant intends to restore and enhance a minimum of 6.93ha of peatland habitat in the field study area, and where possible, a larger area of peatland will be restored than the area lost or degraded within five years of commissioning of the development. Furthermore, the Outline HMP identifies a combined potential peatland restoration search area of 64.31ha and reassures that, within these search areas, damming, infilling and reprofiling could restore a minimum of 8ha of peatland. This commitment is unchanged with the removal of three turbines and associated infrastructure. The Outline HMP includes further biodiversity enhancement measures, namely riparian woodland and montane scrub planting and installation of artificial nesting rafts for divers. These measures are not required as mitigation for the Ecological Impact Assessment (EclA) but are proposed as opportunities for biodiversity enhancement within the wider field study area. These commitments also remain unchanged for the 15 turbine Proposed Development.

Policy 19: Green Energy

- 4.2.18 The introductory text to Policy 19 states that the planning system should support all forms of renewable energy development and energy storage as a key contributor to achieving net zero emissions by 2045.

- 4.2.19 Policy 19 criterion B sets out that *"development proposals for all forms of renewable energy... should be supported in principle"*.

- 4.2.20 Draft NPF4 does not carry forward the spatial framework for onshore wind energy development set out in SPP, instead stating at Policy 19 criterion E that:

"Development proposals to repower, extend and expand existing wind farms and for the extension of life to existing windfarms should be supported unless the impacts identified (including cumulative effects) are unacceptable."

- 4.2.21 The EIA Report concludes that there are no significant impacts in relation to natural, built and cultural heritage features, species and habitats, noise, shadow flicker, hydrology, aviation, communications, or transport. Whilst it is acknowledged there will be some landscape and visual impacts associated with the 15 turbine Proposed Development (refer to Section 8 below), as there were for the 18 turbine Proposed Development assessed in the EIA Report, these will be localised and should be balanced against the valuable contribution it will make as a cost effective and

established form of renewable energy development which constitutes sustainable development and makes a valuable contribution to climate change targets.

- 4.2.22 The Proposed Development is for the extension of an existing windfarm, and the EIA Report (for the 18 turbine Proposed Development) and this subsequent AIR (for the 15 turbine Proposed Development) does not identify any significantly unacceptable impacts (including cumulative effects). The reduction in turbine number and associated infrastructure from the 18 turbine Proposed Development to the 15 turbine Proposed Development will be beneficial, resulting in marginal reductions in the level of assessed residual effects including:
- Construction effects on Slavonian Grebe is reduced from minor to negligible (not significant);
 - Visibility from cultural heritage Site 3 (Dell Farm, burial ground) and Site 9 (Whitebridge, old bridge over the River Foyers) is removed, reducing from negligible to no effect; and
 - Visual impact at LVIA VP 6 is reduced from minor-moderate to minor (not significant).
- 4.2.23 The removal of turbines will provide small improvements in visual composition and extent of the turbines from key viewpoints. The reduced layout footprint of the 15 turbine Proposed Development is also anticipated to provide a benefit to sensitive habitats and species compared to the 18 turbine Proposed Development, with a reduction in the impacted area of wet heath and wet modified bog habitat, the number of watercourse crossings, and the required excavated volumes of peat. The reduced footprint does not, however, alter the significance of the effects reported in the EIA Report and is considered acceptable in the context of Policy 19.
- 4.2.24 Policy 19 criterion K also sets out specific considerations which proposals for renewable energy developments must take into account. These are largely as presently set out at SPP Paragraph 169 and Highland-Wide Local Development Plan (HwLDP) Policy 67, with minor wording changes and updates. The previous assessment of the 18 turbine Proposed Development in terms of SPP Paragraph 169 and HwLDP Policy 67 set out in the Planning Statement is not repeated here for the 15 turbine Proposed Development. The further design mitigations in relation to landscape and visual impacts included within the 15 turbine Proposed Development are considered to be in accordance with SPP Paragraph 169, HwLDP Policy 67 and Draft NPF4 Policy 19.

Summary

- 4.2.25 The 15 turbine Proposed Development can draw support from the significant emphasis in Draft NPF4 in terms of supporting the transition to net-zero, the weight attributed to the Climate Emergency, and the in-principle support for renewable energy developments.
- 4.2.26 It is acknowledged that Draft NPF4 is subject to ongoing parliamentary scrutiny and public consultation, and therefore it will be up to the Scottish Ministers to determine the weight to be afforded to it in reaching their decision.

4.3 Conclusions

- 4.3.1 This Section of the AIR has considered the 15 turbine Proposed Development in the context of the recently published Draft NPF4, concluding that it can draw significant support from both the proposed vision and policies.
- 4.3.2 The previously submitted Planning Statement concluded that the 18 turbine Proposed Development was broadly in accordance with the Development Plan and supported by a range of material considerations including national planning policy and guidance in respect of renewable energy development and onshore wind. The further design mitigations in relation to landscape and visual impacts included within the 15 turbine Proposed Development are considered to be in accordance with the development plan and other material considerations and more acceptable in the overall planning balance.
- 4.3.3 The publication of Draft NPF4 does not alter these overall conclusions but can be considered an additional material consideration in support of the 15 turbine Proposed Development.

- 4.3.4 The weight to be attached to this material consideration will be a matter for Scottish Ministers to determine at the time of their decision.

5 Ecology

5.1 Introduction

- 5.1.1 This Section of the AIR provides a comparative review of the effects of the 15 turbine Proposed Development on ecological features such as protected habitats and species, against those reported for the 18 turbine Proposed Development. The assessment contained within EIA Report Chapter 5 concluded that with the application of proposed mitigation, no significant residual effects were anticipated. This Section of the AIR should be read in conjunction with EIA Report Chapter 5.

5.2 Assessment of Residual Effects

- 5.2.1 The removal of three turbines and associated infrastructure for the 15 turbine Proposed Development will have no changes on the likely significant effects of the 18 turbine Proposed Development as detailed in EIA Report Chapter 5. However, the 15 turbine Proposed Development will benefit habitats through a reduction in the area of wet heath and wet modified bog habitat to be lost due to the smaller development footprint. The 15 turbine Proposed Development will cause no changes to the loss of blanket bog as the turbines and infrastructure to be removed do not occur in this habitat.
- 5.2.2 The 15 turbine Proposed Development will also have a beneficial effect on water vole (*Arvicola amphibius*), fish and bat species due to the removal of the watercourse crossing across the Allt Saigh to the removed turbine T14. Construction of the crossing would have had a short-term disturbance impact on water vole, fish species and the aquatic habitat, and on bat species commuting and foraging along the river. The new watercourse crossing on the Allt Saigh for the cross country cable will still have a short-term disturbance impact on water vole, fish species, aquatic habitats and bat species if a cable bridge is used, though this is likely to be a low magnitude disturbance impact localised to the crossing and is, therefore, considered to be **not significant**. This AIR has considered the worst-case approach of a cable bridge, however the method of crossing will be determined following detailed ground investigations and will, if feasible, utilise an alternative technology which would avoid any impacts on the Allt Saigh, water vole, fish species and bat species if no works were to occur in or immediately around the watercourse.

5.3 Comparison of Effects

- 5.3.1 There is no requirement for further assessment when it can clearly be stated that with the removal of those turbines and associated infrastructure, there will be a beneficial effect to habitats, and fish and bat species.
- 5.3.2 The beneficial effects of removing the three turbines and associated infrastructure are not sufficient to alter the assessment of the significance of effects to ecological features. The Applicant is committed to undertaking all mitigation measures as set out within EIA Report Chapter 5, including those detailed within Appendix 5.7 Outline HMP, and no changes to the mitigation measures have been proposed as part of the AIR, therefore providing an improvement in the ratio of proposed restoration to predicted impact. Therefore, the assessment of effects set out in EIA Report Chapter 5 remain valid.

6 Ornithology

6.1 Introduction

6.1.1 This Section of the AIR evaluates the effects of the 15 turbine Proposed Development on ornithological features, in comparison to those predicted for the 18 turbine Proposed Development. It supplements EIA Report Chapter 6 which should be read in conjunction with this Section. The ornithology assessment within EIA Report Chapter 6 concluded that, following the implementation of mitigation, no significant residual effects are predicted.

6.2 Assessment of Residual Effects

Changes to Policy and Guidance

6.2.1 All legislation, policy and guidance listed in EIA Report Chapter 6 remains applicable. Since the publication of the EIA Report, NatureScot (2021) has released a position statement on the approach to model effects of wind farms on golden eagle and this has been considered in the AIR assessment.

6.2.2 An updated fifth version of the UK's Birds of Conservation Concern list has been recently published (Stanbury et al. 2021). The status of all Important Ornithological Features (IOFs) taken forward to assessment has however remained unchanged.

Changes to Likely Effects

6.2.3 In terms of potential construction and operational effects, the removal of three turbines and the reduction in temporary and permanent infrastructure will result in:

- A reduction in direct habitat loss associated with temporary and permanent infrastructure throughout the construction and operational phases;
- A reduction in the extent of disturbance effects during the construction phase associated with a smaller wind farm footprint;
- A reduction in the extent of displacement (indirect habitat loss) during the operational phase due a decrease in the number of turbines; and
- A reduction in collision risk with operational turbines due to a reduction in turbine numbers.

Construction

6.2.4 The construction footprint would decrease to the east of the Site, where turbines T13, T14 and T18 have been removed. Despite the smaller wind farm size, it has been assumed as a precaution that the construction period would last a similar amount of time as that assessed in the EIA Report (up to 24 months).

6.2.5 Table 6.1 summarises the changes to assessment of significance of effect that occurs as a result of the removal of the three turbines and associated infrastructure. Where a change in the level of significance is predicted for an IOF, detail is provided below.

Table 6.1 - Changes in unmitigated likely effects of construction on IOFs

Species	Level of Effect – 18 Turbine Development	Level of Effect – 15 Turbine Development	Significance
Red-throated Diver	Minor Adverse	Minor Adverse	Not Significant
Slavonian Grebe	Minor Adverse	Negligible	Not Significant

Species	Level of Effect – 18 Turbine Development	Level of Effect – 15 Turbine Development	Significance
Black Grouse	Moderate Adverse	Minor Adverse	Not Significant
Golden Eagle	Minor Adverse	Minor Adverse	Not Significant
Greenshank	Minor Adverse	Minor Adverse	Not Significant
Golden Plover	Minor Adverse	Minor Adverse	Not Significant

Slavonian Grebe

- 6.2.6 As reported in EIA Report Chapter 6, the closest breeding loch to infrastructure associated with the 18 turbine Proposed Development was approximately 650m away (EIA Report Confidential Figure 6.2.4). Due to the removal of the three turbines in the east, this is now around 1.1km from the closest infrastructure (borrow pit associated with T17). Evidence presented in the EIA Report Chapter 6 suggests that at this distance, Slavonian grebes are unlikely to be disturbed by construction activities. Nevertheless, breeding Slavonian grebe would fall under the remit of the BBPP and pre- and during-construction checks by the Ecological Clerk of Works (ECoW) or an ornithologist, who would ensure that no breeding attempts are disturbed.
- 6.2.7 Due to the reduction in disturbance risk, the unmitigated effect on Natural Heritage Zone (NHZ) 7, and SSSI and Ramsar Slavonian grebe populations from construction can be **reclassified from minor adverse to negligible** and therefore remains not significant in the context of the EIA Regulations.
- 6.2.8 An HRA appropriate assessment of effects of the 18 turbine Proposed Development on Natura sites where Slavonian grebe is a qualifying feature was presented in EIA Report, Appendix 6.4. Construction effects were scoped out of this assessment due to a lack of likely significant effects, and this remains appropriate for the 15 turbine Proposed Development. As such it can be concluded that there would be no adverse effects on integrity of any SPA due to the presence of the 15 turbine Proposed Development.

Black Grouse

- 6.2.9 Of the four lek sites recorded during baseline surveys, three are located to the south of the main Site (refer to EIA Report Figure 6.6), and unmitigated construction effects would be unchanged from those predicted in the EIA Report Chapter 6. Lek 4, where up to six males were present, was recorded approximately 700m south of T18, but with the removal of this in the 15 turbine Proposed Development, the closest infrastructure would be at T17, with Lek 4 being over 1km south-east of T17. At this distance it is unlikely that the lek would be affected by construction activities, which would reduce the overall worst-case loss on the NHZ 7 population (473 lekking males) from nine males due to the 18 turbine Proposed Development, to three males. This represents 0.6% of the population, down from 1.9%.
- 6.2.10 Due to the reduction in disturbance risk, the unmitigated effect on the NHZ 7 black grouse population from construction can be **reduced from moderate to minor adverse** and therefore is now not significant in the context of the EIA Regulations.

Operation: Displacement

- 6.2.11 The removal of turbines T13, T14 and T18 for the 15 turbine Proposed Development means that the extent of the wind farm footprint is now reduced, and so the area to which breeding or foraging IOFs in the east of the Site may have been displaced by operational turbines is likely to be smaller.
- 6.2.12 For each IOF, it has been concluded that despite a reduction in number of turbines and associated infrastructure, there would be no changes to the predicted significance of unmitigated effects, when considered at a population level (Table 6.2).

Table 6.2 - Changes in unmitigated likely effects of displacement on IOFs

Species	Level of Effect – 18 Turbine Development	Level of Effect – 15 Turbine Development	Significance
Red-throated Diver	Minor Adverse	Minor Adverse	Not Significant
Slavonian Grebe	Minor Adverse	Minor Adverse	Not Significant
Black Grouse	Minor Adverse	Minor Adverse	Not Significant
Golden Eagle	Minor Adverse	Minor Adverse	Not Significant
Greenshank	Minor Adverse	Minor Adverse	Not Significant
Golden Plover	Minor Adverse	Minor Adverse	Not Significant

Operation: Collision Risk

- 6.2.13 Collision Risk Modelling (CRM) was undertaken for the EIA Report using the results of flight activity surveys carried out for the Operational Development and the 18 turbine Proposed Development. Methods, input parameters and results are presented in EIA Report Appendix 6.1.
- 6.2.14 No CRM has been undertaken for the 15 turbine Proposed Development, as it can be reasonably assumed that the predicted annual collision rates would be reduced (or at least remain largely unchanged) for all IOFs due to the reduction in turbine numbers.
- 6.2.15 For each IOF, it has been concluded that despite a reduction in number of turbines, there would be no changes to the predicted significance of unmitigated effects, when considered at a population level (Table 6.3).

Table 6.3 - Changes in unmitigated likely effects of collision on IOFs

Species	Level of Effect – 18 Turbine Development	Level of Effect – 15 Turbine Development	Significance
Red-throated Diver	Negligible	Negligible	Not Significant
Slavonian Grebe	Minor Adverse	Minor Adverse	Not Significant
Black Grouse	Negligible	Negligible	Not Significant
Golden Eagle	Minor Adverse	Minor Adverse	Not Significant
Greenshank	Negligible	Negligible	Not Significant
Golden Plover	Negligible	Negligible	Not Significant

Mitigation and Enhancement

- 6.2.16 All mitigation and enhancement measures outlined in Section 6.10 of EIA Report Chapter 6 remain committed to by the Applicant, despite the non-significant unmitigated effects associated with the 15 turbine Proposed Development for all IOFs, as presented above.
- 6.2.17 Detailed plans of implementation of these measures would be agreed in consultation with relevant organisations prior to construction commencement.

Residual Effects

- 6.2.18 As there is no further mitigation required, and with proposed mitigation and enhancement measures, the level of significance and therefore residual effects for all IOFs are unchanged or reduced from those unmitigated effects predicted in Tables 6.1 to 6.3 (negligible or minor adverse, and therefore not significant in EIA terms).

6.3 Comparison of Effects

- 6.3.1 With one exception, the assessment of significance of residual effects on IOFs during construction and operation of the 15 turbine Proposed Development would be unchanged from the assessment of effects set out for the 18 turbine Proposed Development in EIA Report Chapter 6. The one exception is the residual effects of Slavonian Grebe during construction, which would reduce from minor adverse to negligible.
- 6.3.2 Despite no significant residual effects being predicted, the mitigation and enhancement measures originally presented in the EIA Report remain committed to by the Applicant.
- 6.3.3 It is also concluded that the 15 turbine Proposed Development would not adversely affect the integrity of any SPA, either alone or in-combination with other projects, as was the case for the 18 turbine Proposed Development.

7 Archaeology and Cultural Heritage

7.1 Introduction

- 7.1.1 EIA Report Chapter 7: Archaeology and Cultural Heritage established the historic environment baseline for the site and assessed the potential setting effects on the cultural heritage receptors which might result from the construction, operation and decommissioning of the 18 turbine Proposed Development. No significant effects were predicted. This assessment considers changes to significance of effects as a result of the proposed changes to the Proposed Development set out in AIR Section 2.

7.2 Assessment of Residual Effects

- 7.2.1 Following the proposed changes to the 18 turbine Proposed Development as set out in Section 2, a reassessment of the residual effects to cultural heritage resulting from the Proposed Development has been undertaken. This reassessment assumes that the additional mitigation and enhancement measures outlined in Section 7.10 of the EIA Report will be undertaken.

Construction

- 7.2.2 There is no change anticipated from the assessment as set out within EIA Report Chapter 7.

Operation

- 7.2.3 Operational effects include the potential for impacts upon the setting of designated heritage assets within the 5km and 10km study areas set out in EIA Report Chapter 7. All designated heritage assets within the study areas and within the zone of theoretical visibility (ZTV) were subject to detailed assessment for the EIA Report (see Table 7.7 in the EIA Report). All have been re-assessed in light of the proposal to remove T13, T14 and T18.
- 7.2.4 Examination of the revised ZTV (refer to AIR Figure 8.1.2) for this assessment has found that Dell Farm, burial mounds (Site 3) and Whitebridge, old bridge over the River Foyers (Site 9) will now lie outwith the ZTV and no turbines will be visible from them. Section 7.9 of the EIA Report predicted negligible and neutral, and not significant, level effects upon the setting of these assets respectively. Based on the removal of T13, T14 and T18, **there would be no effects on the setting** of these assets.

7.2.5 For many of the other designated assets brought forward for assessment (see Table 7.7 in the EIA Report) there would be a reduction in the number of turbines visible from them. However, the reduction would not be such that it would reduce the magnitudes of impact or levels of effect predicted in the EIA Report.

Additional Mitigation

7.2.6 Mitigation proposals as outlined in Section 7.10 of the EIA Report remain valid and no additional mitigation measures are proposed.

7.3 Comparison of Effects

7.3.1 The removal of T13, T14 and T18, and associated track infrastructure, would result in no intervisibility with the 15 turbine Proposed Development for two assets (Sites 3 and 9), and, as such, there would be no impact upon their settings. Previously, for the 18 turbine Proposed Development, negligible and neutral, and not significant, level effects were predicted for these assets.

7.3.2 Overall, there would be a reduction in the number of turbines visible from the designated heritage assets considered in the assessment of operational effects in the EIA Report. However, that reduction is not such that there would be a material change to the magnitudes of impact and levels of effect presented in the EIA Report Chapter 7.

8 Landscape and Visual

8.1 Introduction

8.1.1 The purpose of this Section of the AIR is to provide an understanding of how the Landscape and Visual Effects arising from the 15 turbine Proposed Development layout compare with those described for the 18 turbine Proposed Development layout as assessed in the EIA Report (Chapter 8: Landscape and Visual). Overall, the landscape and visual impact assessment concluded that the 18 turbine Proposed Development would result in no significant landscape effects and a very limited extent of significant visual effects, affecting receptors in localised areas to the east of Loch Ness, along the B862 road, between 9-11km from the 18 turbine Proposed Development. Outwith this area, landscape and visual effects would not be significant.

8.1.2 This review is supported by the AIR figures listed in Table 8.1a and 8.1b, all produced in accordance with THC guidelines ‘Visualisation Standards for Wind Energy Developments’ (THC, 2016). The 15 turbine Proposed Development is referred to as the ‘15 Turbine Layout’ on these AIR figures.

Table 8.1a – Supporting AIR LVIA Figures

AIR Figure Number	AIR Figure Name and Content
Figure 8.1.1	Viewpoints with ZTV (15 Turbine Layout)
Figure 8.1.2	Comparative ZTV – 15 Turbine Layout with 18 Turbine Layout
Figure 8.1.3	Cumulative ZTV – 15 Turbine Proposed Development with Bhlaraidh (the Operational Development)
Figure 8.2.1 – 8.2.2	VP 1 Track to Loch Liath (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.3.1 – 8.3.2	VP 2 Old Bridge, Invermoriston (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>

AIR Figure Number	AIR Figure Name and Content
Figure 8.4.1 – 8.4.2	VP 3 Meall Fuar-mhonaidh (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.5.1 – 8.5.2	VP 4 Achtuie Road near Creag Nay (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.6.1 – 8.6.2	VP 5 Suidhe Viewpoint, B862 (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.7.1 – 8.7.2	VP 6 Summit by Suidhe Viewpoint, B862 (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.8.1 – 8.8.2	VP 7 B862 south of Foyers (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.9.1 – 8.9.2	VP 8 Lochside picnic layby on B852 (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.10.1 – 8.10.2	VP 9 Carn na Saobhaidhe (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.11.1 – 8.11.2	VP 10 Great Glen Way near Carn a' Bhodaich (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.12.1 – 8.12.2	VP 11 Meall Mor, Glen Affric (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.13.1 – 8.13.2	VP 12 Creag Dhubh (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.14.1 – 8.14.2	VP 13 Sgùrr nan Conbhairean (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.15.1 – 8.15.2	VP 14 Meall Dubh (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.16.1 – 8.16.2	VP 15 Poll-gormack Hill (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.17.1 – 8.17.2	VP 16 Geal Charn (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.18.1 – 8.18.2	VP 17 B862 south of Dores (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>

AIR Figure Number	AIR Figure Name and Content
Figure 8.19.1 – 8.19.2	VP 17 B862 south of Dores (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.20.1 – 8.20.2	VP 19 Path north of Loch Affric (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.21.1 – 8.21.2	VP 20 Path north of Affric Lodge (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.22.1 – 8.22.2	VP 21 Toll Creagach (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.23.1 – 8.23.2	VP 22 Sgurr na Ruaidhe (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.24.1 – 8.24.2	VP 23 An Cabar (Ben Wyvis) (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.25.1 – 8.25.2	VP 24 NCN1 Between Dingwall and Evanton (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.26.1 – 8.26.2	VP 25 Minor road near Tore (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>
Figure 8.27.1 – 8.27.2	VP 26 A87 Bun Loyne (15 Turbine Layout) <i>Location Plan, Existing View and Wireline</i>

8.1.3 An AIR ‘Visualisation Pack’ is also appended to the AIR, providing further visualisations for seven viewpoints¹ identified by THC, produced in accordance with THC (2016) guidance. Figures are listed in Table 8.1b.

Table 8.1b – Supporting LVIA AIR ‘Visualisation Pack’

AIR Figure Number	AIR Figure Name and Content
Figure 8.1.1 (copy)	Viewpoints with ZTV (15 Turbine Layout) (copy)
Figure 8.1.2 (copy)	Comparative ZTV – 15 Turbine Layout with 18 Turbine Layout (copy)
Figure 8.1.3 (copy)	Cumulative ZTV – 15 Turbine Proposed Development with Bhlaraidh (the Operational Development) (copy)

¹ Visualisations for these seven viewpoints were also requested by THC for inclusion in the 8th February 2022 committee meeting Visualisation Pack. These visualisations were extracts from the EIA Report, illustrating the 18 turbine Proposed Development.

AIR Figure Number	AIR Figure Name and Content
Figure 1a-f	VP 3 Meall Fuar-mhonaidh (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 2a-f	VP 5 Suidhe Viewpoint, B862 (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 3a-f	VP 6 Summit by Suidhe Viewpoint, B862 (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 4a-f	VP 7 B862 south of Foyers (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 5a-f	VP 11 Meall Mor, Glen Affric (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 6a-f	VP 12 Creag Dhubh (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>
Figure 7a-f	VP 17 B862 south of Dores (15 Turbine Layout) <i>Location Plan, Existing View, Wireline and Photomontages</i>

8.2 Visual Assessment Review

8.2.1 The 15 turbine Proposed Development incorporates the removal of three turbines (T13, T14 and T18) and associated track infrastructure, which has the potential to change the effects assessed and presented in EIA Report Chapter 8. This summary focusses on the implications of these changes on the key viewpoints of concern to THC and compares them to those arising from the 18 turbine Proposed Development. A brief summary of potential changes to other viewpoints is also provided. This approach was confirmed in February 2022, following review of a proposed scope prepared by the Applicant and agreed with THC and the ECU.

Assessment Scope

8.2.2 As agreed with THC and ECU, this summary will focus on the potential changes to the following viewpoints:

- VP 3 – Meall Fuar-mhonaidh
- VP 5 – Suidhe Viewpoint, B862
- VP 6 – Summit by Suidhe Viewpoint, B862
- VP 7 – B862 south of Foyers
- VP 11 – Meall Mor, Glen Affric
- VP 12 – Creag Dubh
- VP 17 – B862 south of Dores

8.2.3 A brief summary of the potential changes to the remaining viewpoints assessed as part of the EIA Report is also provided.

- 8.2.4 The review of viewpoints is also followed by a summary of potential changes to effects on settlement and route based visual receptors and cumulative visual effects.
- 8.2.5 As outlined in Table 8.1a, an updated ZTV for the 15 turbine Proposed Development is provided with viewpoint locations, along with figures for all 26 viewpoints to allow for comparison with those included in the EIA Report. A 'Visualisation Pack' (see Table 8.1b) is also appended to provide further visualisations for the seven viewpoints listed above.

Comparison of Visual Effects

Viewpoints

8.2.6 A review of each viewpoint is provided in Table 8.2. The effect ratings used are as described in the methodology for the Visual Assessment in the EIA Report Chapter 8, Section 8.5.

8.2.7 The table rows for the seven viewpoints of particular interest to THC are shaded in grey. Significant effects are underlined.

Table 8.2 – Comparison of Visual Effects for Viewpoints

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
VP 1: Track to Loch Liath (A/R Figure 8.2.1 – 8.2.2)	Minor (not significant)	The removal of T13, T14 and T18 would remove turbine tips and one hub from the horizon, seen behind other turbines. This small compositional change would not change the level of visual effect assessed in the EIA Report.	Minor (not significant)	No Change
VP 2: Old Bridge, Invermoriston (A/R Figure 8.3.1 – 8.3.2)	Minor (not significant)	T13, T14 and T18 would not be visible from this VP in the 18 turbine Proposed Development layout, so their removal would not affect the level of visual effect assessed in the EIA Report.	Minor (not significant)	No Change
VP 3: Meall Fuar-mhonaidh (A/R Figure 8.4.1 – 8.4.2 and A/R 'Visualisation Pack' Figures 1a-f)	Minor-Moderate (not significant)	The removal of T13, T14 and T18 would make the 15 turbine Proposed Development appear less visually close to receptors at this VP, thereby potentially increasing the perceived distance to wind development. It would also very slightly reduce the perceived difference in scale between the proposed turbines and the Operational Development, particularly since T13 and T18 would be closer and therefore appear slightly larger in scale than other proposed turbines. The removal of T13 would also reduce stacking with T12 and T4.	Minor-Moderate (not significant)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
		<p>The removal of tracks to T13 and T18 and to T14, along with turning head amendments near T17 and T16 would also result in perceptible improvements from this VP. Tracks would be less visible and would contribute to the perception of the wind turbines being more distant in the view.</p> <p>Overall, there would be a small improvement in composition, but this would not change the level of visual effect assessed in the EIA Report.</p>		
<p>VP 4: Achtuie Road near Creag Nay (A/R Figure 8.5.1 – 8.5.2)</p>	Negligible-Minor (not significant)	<p>The removal of T13 would reduce the horizontal extent of the Proposed Development, but this change would be barely perceptible since only the tips of T13 would be seen from this VP. Therefore, this would not change the level of visual effect assessed in the EIA Report.</p> <p>T14 and T18 would not be visible in the 18 turbine Proposed Development, so their removal would not affect the level of visual effect assessed in the EIA Report.</p>	Negligible-Minor (not significant)	No Change
<p>VP 5: Suidhe Viewpoint, B862 (A/R Figure 8.6.1 – 8.6.2 and A/R 'Visualisation Pack' Figures 2a-f)</p>	Moderate <u>(significant)</u>	<p>The removal of T13 and T18 would reduce the horizontal spread of the Proposed Development and improve the composition of the scheme from this VP.</p> <p>The removal of T14, which would slightly come down the landform, would remove stacking with T5, thereby leading to a small improvement in composition.</p>	Moderate <u>(significant)</u>	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
		Overall, there would be small improvements in composition, but this would not change the level of visual effect assessed in the EIA Report.		
VP 6: Summit by Suidhe Viewpoint, B862 (AIR Figure 8.7.1 – 8.7.2 and AIR ‘Visualisation Pack’ Figures 3a-f)	Minor-Moderate (not significant)	As for VP 5, the removal of T13 and T18 would reduce the horizontal spread of the Proposed Development and improve the composition of the scheme from this VP, such that the visual effect would be reduced to Minor (not significant), during construction and operation. T14 would only be visible as a tip in the 18 turbine Proposed Development layout, so its removal would not be perceptible.	Minor (not significant)	Reduction of Effect
VP 7: B862 south of Foyers (AIR Figure 8.8.1 – 8.8.2 and AIR ‘Visualisation Pack’ Figures 4a-f)	Moderate (<u>significant</u>)	The removal of T18 would reduce stacking with T6 and T12, while the removal of T13 and T14 would reduce overlapping turbines, to a limited degree, resulting in a small improvement. The tips of T13 and T18 would appear very slightly taller than other Proposed Development turbines in this view, so their removal would slightly reduce the vertical extent occupied by turbines. Overall, there would be small improvements in composition, but this would not change the level of visual effect assessed in the EIA Report. NB. This VP is illustrative of passing views obtained by B862 road users who would be mobile with a constantly changing view and it is unlikely that changes to one static VP on this road would alter how the Proposed Development would be perceived by receptors along the whole route.	Moderate (<u>significant</u>)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
VP 8: Lochside picnic layby on B852 (AIR Figure 8.9.1 – 8.9.2)	Negligible (not significant)	T13, T14 and T18 would not be visible from this VP in the 18 turbine Proposed Development layout, so their removal would not affect the level of visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 9: Carn na Saobhaidhe (AIR Figure 8.10.1 – 8.10.2)	Negligible-Minor (not significant)	T13, T14 and T18 would be visible slightly in front of other turbines in the 18 turbine Proposed Development, so their removal would slightly reduce the vertical extent occupied by turbines. Their removal would also reduce stacking / overlapping turbines. However, these changes would be barely perceptible at this distance (over 20 km away) and in the context of several other operational wind developments. This would not change the level of visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change
VP 10: Great Glen Way near Carn a' Bhodaich (AIR Figure 8.11.1 – 8.11.2)	Minor (not significant)	The removal of T14 and T18 would reduce the horizontal spread of turbines on the horizon, while the removal of T13 would reduce the vertical extent, since it would appear taller than other turbines. There would therefore be small improvements in composition but, given the distance from this VP (over 23 km), the removal of these turbines would not affect the level of visual effect assessed in the EIA Report.	Minor (not significant)	No Change
VP 11: Meall Mor, Glen Affric (AIR Figure 8.12.1 – 8.12.2 and AIR 'Visualisation Pack' Figures 5a-f)	Negligible-Minor (not significant)	The removal of T13, T14 and T18, which would be situated behind other proposed and operational turbines in the 18 turbine Proposed Development, would very slightly reduce the appearance of stacking with other turbines, but their removal would be largely imperceptible. Several other operational wind farms would also be seen with the Proposed Development from this VP and there would not be any change to the visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
VP 12: Creag Dubh (AIR Figure 8.13.1 – 8.13.2 and AIR 'Visualisation Pack' Figures 6a-f)	Negligible (not significant)	The removal of T13, T14 and T18 would remove tips from the horizon, where several other proposed and operational turbines would be visible. Their removal would not be perceptible and would not be any change to the visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 13: Sgùrr nan Conbhairean (AIR Figure 8.14.1 – 8.14.2)	Negligible (not significant)	The removal of T13, T14 and T18 would very slightly reduce stacking / overlapping turbines but at this distance (over 26 km) and in this context of several other operational wind developments, this change would not be perceptible. There would not be any change to the visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 14: Meall Dubh (AIR Figure 8.15.1 – 8.15.2)	Negligible-Minor (not significant)	The removal of T13, T14 and T18 would reduce stacking / overlapping with other turbines, but be largely imperceptible, particularly considering the overall experience from this VP, where several other operational wind developments would be experienced along with the Proposed Development, including nearby Millennium Wind Farm. There would not be any change to the visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change
VP 15: Poll-gormack Hill (AIR Figure 8.16.1 – 8.16.2)	Minor (not significant)	The removal of T13 and T18 would reduce the horizontal extent of the turbines and would result in a perceptible improvement to the visual composition of the Proposed Development, albeit in the distance (over 22 km away). The removal of T14 would slightly isolate T17 but would simplify the layout slightly. Overall, although there would be some small improvements to the composition, there would be no change to the visual effect assessed in the EIA Report.	Minor (not significant)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
VP 16: Geal Charn (AIR Figure 8.17.1 – 8.17.2)	Negligible (not significant)	The removal of T13 and T18 would reduce the horizontal spread of the Proposed Development, while the removal of T14 would leave a small space between proposed turbines. These changes would be largely imperceptible particularly considering its distance (over 26 km away) and the overall experience from this VP, where several other operational wind developments would be experienced along with the Proposed Development, including Stronelaig Wind Farm in the foreground. There would not be any change to the visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 17: B862 south of Dores (AIR Figure 8.18.1 – 8.18.2 and AIR 'Visualisation Pack' Figures 7a-f)	Minor-Moderate (not significant)	T13, T14 and T18 would not be visible from this VP in the 18 turbine Proposed Development layout, so their removal would not affect the level of visual effect assessed in the EIA Report.	Minor-Moderate (not significant)	No Change
VP 18: Track near Dun Fhamhair fort (AIR Figure 8.19.1 – 8.19.2)	Negligible-Minor (not significant)	The removal of T13, T14 and T18 would reduce the horizontal spread of the Proposed Development but given its distance (over 25 km away), this is unlikely to be perceptible and would not change the visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change
VP 19: Path north of Loch Affric (AIR Figure 8.20.1 – 8.20.2)	Negligible (not significant)	T13, T14 and T18 would not be visible from this VP in the 18 turbine Proposed Development layout, so their removal would not affect the level of visual effect assessed in the EIA Report.	Negligible (not significant)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
VP 20: Path north of Affric Lodge (AIR Figure 8.21.1 – 8.21.2)	Negligible (not significant)	T13, T14 and T18 would not be visible from this VP in the 18 turbine Proposed Development layout, so their removal would not affect the level of visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 21: Toll Creagach (AIR Figure 8.22.1 – 8.22.2)	Negligible-Minor (not significant)	The removal of T18 would remove stacking, while the removal of T14 would remove a turbine tip from view. The removal of T13 would leave a small space between T5 and T6. These changes would all be largely imperceptible at this distance (over 19 km) and in a context where there are several operational wind developments also in view. There would be no change to the level of visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change
VP 22: Sgurr na Ruaidhe (AIR Figure 8.23.1 – 8.23.2)	Negligible-Minor (not significant)	The removal of T13 and T18 would reduce the horizontal extent occupied by turbines, while the removal of T14 would remove some overlapping blades. However, given the distance (over 22 km away), these small improvements are unlikely to be noticeable and there would be no change to the level of visual effect assessed in the EIA Report.	Negligible-Minor (not significant)	No Change
VP 23: An Cabar (Ben Wyvis) (AIR Figure 8.24.1 – 8.24.2)	Negligible (not significant)	The removal of T13 and T18 would reduce the horizontal extent occupied by turbines, while the removal of T14 would remove some overlapping turbines. However, these changes would not be perceptible at this distance (over 44 km away) and there would be no change to the level of visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 24: NCN1 Between Dingwall and Evanton	Negligible (not significant)	The removal of T13, T14 and T18 would reduce the horizontal extent occupied by turbines. However, these changes would not be perceptible	Negligible (not significant)	No Change

Viewpoint	Effect Rating for 18 turbine Proposed Development	Potential Changes to Visual Effects	Effect Rating for 15 turbine Proposed Development	Change to Effect Rating
(AIR Figure 8.25.1 – 8.25.2)		at this distance (over 42 km away) and there would be no change to the level of visual effect assessed in the EIA Report.		
VP 25: Minor road near Tore (AIR Figure 8.26.1 – 8.26.2)	Negligible (not significant)	The removal of T13 and T18 would reduce the horizontal extent occupied by turbines. However, these changes would not be perceptible at this distance (over 42 km away) and there would be no change to the level of visual effect assessed in the EIA Report. T14 would not be visible from this VP in the 18 turbine Proposed Development layout, so its removal would not affect the level of visual effect assessed in the EIA Report.	Negligible (not significant)	No Change
VP 26: A87 Bun Loyne (AIR Figure 8.27.1 – 8.27.2)	Minor (not significant)	The removal of T13, T14 and T18 would remove some tips from the horizon but this change would not change the level of visual effect assessed in the EIA Report.	Minor (not significant)	No Change

8.2.8 Overall, having considered the visual assessment for receptors at the 26 viewpoints assessed in the EIA Report, the removal of T13, T14 and T18 would result in very few perceptible changes. For receptors at VP 6 (Summit by Suidhe Viewpoint, B862), **the visual effect would change from Minor-Moderate to Minor** (both not significant), but for all receptors at all other VPs, the visual effect would not change from the EIA Report. Therefore, it would not lead to any change in the presence of significant effects.

8.2.9 For example, for receptors at VP 3 (Meall fuar-Mhonaidh), the removal of turbines and track infrastructure would lead to an improved composition, where the Proposed Development would be perceived as more distant from the viewer, but would not affect the visual effect, such that it would remain Minor-Moderate (not significant). From a number of other VPs, there would be small improvements to the visual composition of the Proposed Development, whereby stacking or overlapping turbines would be removed (such as at VP 7), or the horizontal extent would be reduced (such as at VP 5). From many VPs, these changes would not be perceptible due to distance and context alongside other operational wind developments.

Settlement and Route Based Visual Receptors

- 8.2.10 The 15 turbine Proposed Development would lead to a reduction in the number of visible turbines seen from some settlement and route based receptors. However, this is not anticipated to lead to any changed effects ratings for visual receptors, either because of the continued presence of other equally visible turbines, or the peripheral nature of the Proposed Development within existing views. There would therefore be no changes to the effects ratings for these visual receptors reported in EIA Report Chapter 8.

Cumulative Visual Effects

- 8.2.11 For receptors at VP 6 (Summit by Suidhe Viewpoint, B862), the removal of T13, T14 and T18 is anticipated to result in a **reduction of cumulative visual effects to Minor**, compared to the Minor-Moderate cumulative visual effect assessed in the EIA Report for the 18 turbine Proposed Development.
- 8.2.12 As no other changes to visual effects ratings are anticipated (non-cumulative) for receptors at VPs, it is also concluded that there would be no other changes to cumulative visual effects reported in the EIA Report. As the 15 turbine Proposed Development would continue to have a similar presence within the view from all VPs, it is not considered that there would be any change to how this would be perceived within the cumulative baseline.

8.3 Landscape Assessment Review

Assessment Scope

- 8.3.1 Consideration of potential changes to effects on Landscape Character Types (LCTs) and designated and protected landscape has been undertaken. The review and interpretation of viewpoints described in AIR Section 8.2 forms the basis of the Landscape Assessment Review, aided by review of the ZTV for the 15 turbine Proposed Development (see AIR Figure 8.1).

Comparison of Landscape Effects

- 8.3.2 It is not considered that there would be any changes to landscape effects or cumulative landscape effects from the 15 turbine Proposed Development in comparison to the 18 turbine Proposed Development assessed in the EIA Report, since it would occupy a similar footprint and have a similar scale and appearance within the wider landscape.

8.4 Conclusions

- 8.4.1 Whilst the 15 turbine Proposed Development may lead to some perceptible changes in views in comparison with the 18 turbine Proposed Development presented in the EIA Report, there would only be changes to the visual effect rating for receptors at one VP. At this VP, (VP 6: Summit by Suidhe Viewpoint), the visual effect (and cumulative visual effect) would be Minor, rather than Minor-Moderate, and would remain non-significant. All other effects identified in the landscape and visual assessment (including cumulative assessments) would remain the same as reported in EIA Report Chapter 8. There would therefore be no changes to the number and distribution of significant landscape and visual effects for the Proposed Development.

9 Hydrology and Hydrogeology

9.1 Introduction

- 9.1.1 EIA Report Chapter 9 for the 18 turbine Proposed Development describes the assessment of effects on hydrology and hydrogeology.
- 9.1.2 The baseline hydrology and hydrogeology conditions were established through a desk study and survey work and are set out in EIA Report Chapter 9. The hydrology and hydrogeology assessment

of the 18 turbine Proposed Development concluded that, following the implementation of mitigation, no significant residual effects were predicted.

- 9.1.3 The removal of the access track to T14 means removal of one proposed crossing of the Allt Saigh watercourse (WCX08), although the cable route to turbines north of the watercourse will still require a suitable crossing. The removal of the access track to T18 means the removal of proposed water crossing (WXC07), which is across an unnamed watercourse. Several additional minor culvert crossings of small drain features will also no longer be required due to the removal of stretches of access track from the design. AIR Appendix 9.1 provides a revised watercourse crossing schedule and AIR Figure 9.1 details the watercourse crossings of the 15 turbine Proposed Development.

9.2 Assessment of Residual Effects

- 9.2.1 The removal of the WCX08 watercourse crossing is considered to represent a reduction to potential impacts on the Allt Saigh watercourse. The removal of WCX07 and the other, smaller water crossings also slightly reduces potential impacts on surface water quality and geomorphology. No significant adverse residual effects were anticipated in the EIA Report, taking account of suitable crossing design and embedded mitigation measures. The removal of the watercourse crossings summarised above would represent a slight reduction in level of residual effect. However, the reduction would not result in any change to the overall significance of effect, assessed as minor (not significant).
- 9.2.2 The design changes mean the removal of turbines and other infrastructure nearest to three of the private water supplies (PWSs) in the study area (PWS05, PWS06 and PWS07). These PWSs are all more than 1.5 km from the site and the risk to them from the 18 turbine Proposed Development was assessed as none (PWS05 and PWS07) or low to negligible (PWS06). The design changes are not considered to materially affect that assessment, and there is no change to the significance of effect, assessed as negligible (not significant).
- 9.2.3 No material change to effects on groundwater flow is anticipated to result from the design changes, and the significance of effects remain as negligible (not significant).
- 9.2.4 Flood risk was assessed as no to low risk for the 18 turbine Proposed Development, and the design changes represent no material change to that assessment.

9.3 Comparison of Effects

- 9.3.1 The standard mitigation measures as set out in the EIA Report remain unchanged and committed to by the Applicant.
- 9.3.2 The proposed design changes are anticipated to result in a slight reduction in the level of effect on surface water quality and geomorphology, with the overall significance of effect remaining as minor (not significant).
- 9.3.3 No other changes to assessed effects on hydrological and hydrogeological receptors are anticipated.

10 Geology and Soils

10.1 Introduction

- 10.1.1 The EIA Report evaluated the effect to Geology and Soils for the 18 turbine Proposed Development, based on assessments of effects to peat, soil and underlying geology. The potential construction and operational effects identified were assessed, and with the implementation of appropriate mitigation measures, all residual effects would be negligible, i.e. not significant in terms of the EIA Regulations.

10.2 Assessment of Residual Effects

- 10.2.1 The change from the 18 turbine Proposed Development to the 15 turbine Proposed Development, with the removal of three turbines and associated infrastructure, does not alter the overall conclusions of the Geology and Soils EIA Report Chapter 10. The reduction in civil infrastructure will alter the peat and carbon balances predicted; however, as the result will be beneficial there is no requirement for further detailed assessment.
- 10.2.2 With regards to peat balance, the calculations set out in the Peat Management Plan (PMP; EIA Report Appendix 10.3) noted that there would be a deficit of peat, i.e. the maximum volume of peat restoration would be greater than the volume of peat that would be excavated for construction. Therefore, surplus peat was not an issue, and all areas would still be restored, but altering the thickness of peat deposited.
- 10.2.3 The volume of peat excavated for the 15 turbine Proposed Development would be approximately 116,990m³ (a reduction of 21,580m³ from that reported in the PMP (EIA Report Appendix 10.3)). The maximum volume of peat to be reinstated would be revised to 154,940m³, a 'deficit' of 37,950m³. Similar to the 18 turbine Proposed Development, this 'deficit' can be dealt with by not utilising the maximum restoration depth of peat within all borrow pits (set at 0.5m acrotelm and 1.5m catotelm), and with some other slight adjustments to restoration depths.
- 10.2.4 The total excavated volume of 116,990m³ peat is estimated to comprise 52,460m³ acrotelm and 64,530m³ catotelm. After restoration is completed at all areas except from the borrow pits, the remaining peat comprises approximately 36,690m³ acrotelm and 43,310m³ catotelm.
- 10.2.5 The restoration of borrow pits can have a maximum restoration depth of 0.5m acrotelm peat overlying catotelm peat. Taking this into consideration with the remaining peat left over from the above, utilising maximum 0.5m acrotelm depth and adjusted catotelm depth of 0.73m, this would require 29,620m³ acrotelm and 43,220m³ catotelm.
- 10.2.6 The resulting difference would be a surplus of acrotelm 7,070m³ (36,690m³ – 29,620m³) – this surplus can be accounted for by slightly increasing the depth of acrotelm used in other areas (see below). For catotelm, the resulting difference would be a surplus of 90m³ (43,310m³ - 43,220m³) which can easily be utilised by slightly increasing the depth of catotelm restoration in one borrow pit.
- 10.2.7 The acrotelm surplus of 7,070m³ could easily be utilised elsewhere during restoration works across the development. For example, by in a very minimal increase to the peat depth restoration along access tracks and hardstanding from 0.3m (0.15m acrotelm and 0.15m catotelm) to 0.4m (0.25m acrotelm and 0.15m catotelm) would allow for up to an additional 9,000m³ of acrotelm to be utilised, and therefore no surplus left over and a total peat balance can be achieved.
- 10.2.8 Note that the above recalculations do not change the outcomes of the PMP as it currently stands, that all peat excavated will be utilised on site, and therefore does not affect the impacts assessed in the EIA Report.
- 10.2.9 Also, it is not proposed to update the PMP at this stage with the above calculations as it is currently outline only and will be finalised at a later stage (Stage 2 PMP) to take cognisance of detailed ground investigations and in consultation with SEPA.

10.3 Comparison of Effects

- 10.3.1 While some of the underlying detail in terms of the amount of peat to be excavated and reinstated alter slightly, the assessment of effects reported for the 18 turbine Proposed Development remains the same for the 15 turbine Proposed Development, i.e. the significance of all residual effects remains negligible.

11 Noise

11.1 Introduction

11.1.1 EIA Report Chapter 11 assessed the impact of the 18 turbine Proposed Development on noise sensitive receptors, concluding that residual effects of operational noise would not be significant. This Section of the AIR provides a comparative review of the change in residual effects as a result of the 15 turbine Proposed Development.

11.1.2 In order to consider the 15 turbine Proposed Development (removal of T13, T14 and T18), the total cumulative noise predictions and the noise predictions from the Proposed Development operating in isolation have been updated.

11.1.3 This AIR Section should be read in conjunction with EIA Report Chapter 11 which remains valid. EIA Report Tables 11.8-11.11 have been updated to consider the 15 turbine Proposed Development and the updated results are presented in AIR Tables 11.1-11.4. The Total Noise Limits (which are noise limits which are applicable to all wind farms in the area) and the Site Specific Noise Limits (for the Proposed Development only) are unchanged and are reproduced within AIR Tables 11.1-11.4.

11.2 Consultation

11.2.1 An Environmental Health Officer (EHO) from the Highland Council provided a consultation response to the initial planning application (dated 26 November 2021) and also provided input into the Highland Council Committee Report (dated 8 February 2022) for the 18 turbine Proposed Development. The Committee Report stated the following in relation to noise:

'The Environmental Health Officer does not object to the application. He considers that given the distance to receptors and the adherence to a Construction Environmental Management Plan (CEMP) construction noise is not likely to be a significant issue. He recommends a planning condition to control operational including cumulative noise limits based on the simplified criterion described in ETSU-R-97, limiting noise levels at the nearest noise sensitive properties to no more than 2dB above the predicated levels within Tables 11.9 and 11.10 of the EIAR.'

11.2.2 An updated set of predictions for the 15 turbine Proposed Development operating in isolation are provided in Tables 11.3 and 11.4 below.

11.3 Assessment of Residual Effects

Updated Cumulative Noise Predictions

11.3.1 Table 11.1 and Table 11.2 show a comparison between the Total Noise Limit (TNL) and updated predicted cumulative wind turbine noise levels. The Tables show the exceedance level which is the difference between the predicted wind turbine noise level and the TNL at a given wind speed. A negative exceedance level indicates satisfaction of the noise limit.

11.3.2 The results of the updated cumulative noise assessment show that the 15 turbine Proposed Development can operate concurrently with the operational wind farm developments near to the Noise Assessment Locations (NALs), whilst still meeting the TNL established in accordance with ETSU-R-97 at the three NALs.

Table 11.1 - Compliance Table – Comparison of predicted cumulative noise levels (all schemes) against the TNLs at each receptor – Daytime

Receptor		Wind Speed (ms ⁻¹) as standardised to 10m height											
		1	2	3	4	5	6	7	8	9	10	11	12
NAL1 – Bhlaraidh	Total ETSU-R-97 Noise Limit	37.0	37.0	37.4	38.1	39.2	40.6	42.2	44.1	46.3	48.6	51.2	51.2
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	27.2	31.0	32.8	33.1	33.1	33.1	33.1	33.1
	Exceedance Level L _{A90}	-	-	-	-	-12.0	-9.6	-9.4	-11.0	-13.2	-15.5	-18.1	-18.1
NAL2 – Levischie	Total ETSU-R-97 Noise Limit	41.0	41.0	41.1	41.7	42.8	44.2	45.8	47.6	49.4	51.2	52.8	52.8
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	28.4	31.9	33.3	33.8	33.8	33.8	33.8	33.8
	Exceedance Level L _{A90}	-	-	-	-	-14.4	-12.3	-12.5	-13.8	-15.6	-17.4	-19.0	-19.0
NAL3 - Achnaconeran	Total ETSU-R-97 Noise Limit	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	26.9	30.4	31.7	32.2	32.2	32.2	32.2	32.2
	Exceedance Level L _{A90}	-	-	-	-	-8.1	-4.6	-3.3	-2.8	-2.8	-2.8	-2.8	-2.8

Table 11.2 - Compliance Table – Comparison of predicted cumulative noise levels (all schemes) against the TNLs at each receptor – Night time

Receptor		Wind Speed (ms ⁻¹) as standardised to 10m height											
		1	2	3	4	5	6	7	8	9	10	11	12
NAL1 – Bhlaraidh	Total ETSU-R-97 Noise Limit	43.0	43.0	43.0	43.0	43.0	43.0	43.0	43.0	43.0	44.3	44.3	44.3
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	27.2	31.0	32.8	33.1	33.1	33.1	33.1	33.1
	Exceedance Level L _{A90}	-	-	-	-	-15.8	-12.0	-10.2	-9.9	-9.9	-11.2	-11.2	-11.2
NAL2 – Levischie	Total ETSU-R-97 Noise Limit	43.0	43.0	43.0	43.0	43.0	43.0	43.3	44.7	46.5	48.8	48.8	48.8
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	28.4	31.9	33.3	33.8	33.8	33.8	33.8	33.8
	Exceedance Level L _{A90}	-	-	-	-	-14.6	-11.1	-10.0	-10.9	-12.7	-15.0	-15.0	-15.0
NAL3 - Achnaconeran	Total ETSU-R-97 Noise Limit	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0	35.0
	Predicted Cumulative Wind Turbine Noise L _{A90}	-	-	-	-	26.9	30.4	31.7	32.2	32.2	32.2	32.2	32.2
	Exceedance Level L _{A90}	-	-	-	-	-8.1	-4.6	-3.3	-2.8	-2.8	-2.8	-2.8	-2.8

11.3.3 The removal of T13, T14 and T18 has resulted in a maximum reduction in the predicted cumulative noise levels of 0.2 dB at NAL1, 0.5 dB at NAL2 and 0.7 dB at NAL3.

Updated Site Specific Noise Predictions

11.3.4 The updated predictions from the 15 turbine Proposed Development operating in isolation are presented in Tables 11.3 and 11.4 below. The Site Specific Noise Limits (SSNL) were compared to the updated predictions from the 15 turbine Proposed Development and the results are summarised in Tables 11.3 and 11.4.

11.3.5 The assessment shows that the predicted wind turbine noise immission levels for the 15 turbine Proposed Development meet the SSNL under all conditions and at all locations for both daytime and night-time periods at all receptors.

Table 11.3 - Compliance Table – Comparison of predicted noise levels from the 15 turbine Proposed Development against the SSNL at each receptor – Daytime

Receptor		Wind Speed (ms ⁻¹) as standardised to 10m height											
		1	2	3	4	5	6	7	8	9	10	11	12
NAL1 – Bhlaraidh	Site Specific Noise Limit	37.0	37.0	37.4	38.1	39.2	39.9	41.3	43.5	46.3	48.6	51.2	51.2
	Predicted Wind Turbine Noise L _{A90}	-	13.4	14.7	18.4	22.7	25.7	26.3	27.0	27.0	27.0	27.0	27.0
	Exceedance Level L _{A90}	-	-	-	-	-	-	-	-	-	-	-	-
NAL2 – Levishie	Site Specific Noise Limit	41.0	41.0	41.1	41.7	42.8	44.2	45.8	47.6	49.4	51.2	52.8	52.8
	Predicted Wind Turbine Noise L _{A90}	-	16.8	18.1	21.8	26.1	29.1	29.7	30.4	30.4	30.4	30.4	30.4
	Exceedance Level L _{A90}	-	-	-	-	-	-	-	-	-	-	-	-
NAL3 - Achnaconeran	Site Specific Noise Limit	35.0	35.0	35.0	35.0	35.0	33.8	32.9	32.7	32.7	32.7	32.7	32.7
	Predicted Wind Turbine Noise L _{A90}	-	15.6	16.9	20.6	24.9	27.9	28.5	29.2	29.2	29.2	29.2	29.2
	Exceedance Level L _{A90}	-	-	-	-	-	-	-	-	-	-	-	-

Table 11.4 - Compliance Table – Comparison of predicted noise levels from the 15 turbine Proposed Development against the SSNL at each receptor – Night time

Receptor		Wind Speed (ms ⁻¹) as standardised to 10m height											
		1	2	3	4	5	6	7	8	9	10	11	12
NAL1 – Bhlaraidh	Site Specific Noise Limit	43.0	43.0	43.0	43.0	43.0	43.0	42.3	42.3	42.3	43.8	43.8	43.8
	Predicted Wind Turbine Noise L _{A90}	-	13.4	14.7	18.4	22.7	25.7	26.3	27.0	27.0	27.0	27.0	27.0
	Exceedance Level L _{A90}	-	-	-	-	-	-	-	-	-	-	-	-
NAL2 – Levishie	Site Specific Noise Limit	43.0	43.0	43.0	43.0	43.0	43.0	42.6	44.2	46.5	48.8	48.8	48.8
	Predicted Wind Turbine Noise L _{A90}	-	16.8	18.1	21.8	26.1	29.1	29.7	30.4	30.4	30.4	30.4	30.4
	Exceedance Level L _{A90}	-	-	-	-	-	-	-	-	-	-	-	-
NAL3 - Achnaconeran	Site Specific Noise Limit	35.0	35.0	35.0	35.0	35.0	33.8	32.9	32.7	32.7	32.7	32.7	32.7
	Predicted Wind Turbine Noise L _{A90}	-	15.6	16.9	20.6	24.9	27.9	28.5	29.2	29.2	29.2	29.2	29.2
	Exceedance Level L _{A90}	-	-	-	-	-	-5.9	-4.4	-3.5	-3.5	-3.5	-3.5	-3.5

11.3.6 The removal of T13, T14 and T18 has resulted in a maximum reduction in the predicted noise levels from the 15 turbine Proposed Development only against the SSNL of 0.5 dB at NAL1, 0.9 dB at NAL2 and 1.1 dB at NAL3.

11.4 Comparison of Effects

Operational Effects

11.4.1 The effects of operational noise from the 15 turbine Proposed Development against its own SSNL as reported in EIA Report Chapter 11 remain unchanged and are deemed not significant.

Cumulative Effects

11.4.2 The total predicted cumulative noise levels (from the 15 turbine Proposed Development and other schemes) were found to meet the TNL at all receptors, therefore the effects of cumulative operational noise as reported in EIA Report Chapter 11 remain unchanged and as such no significant cumulative operational noise effects are predicted.

12 Traffic and Transport

12.1 Introduction

12.1.1 As detailed above, the 15 turbine Proposed Development incorporates the removal of three turbines (T13, T14 and T18). This section considers the effects of this change to the assessment of Traffic and Transport effects set out in the EIA Report Chapter 12. The assessment of the 18 turbine

Proposed Development concluded that neither construction nor cumulative residual effects would result in significant effects.

12.2 Assessment of Residual Effects

12.2.1 The removal of three turbines will require the delivery of fewer component parts and construction materials and so it is self-evident that the level of traffic impact will be reduced, relative to that presented in the EIA Report Chapter 12.

12.2.2 Furthermore, it will reduce the number of abnormal deliveries; this, in turn, will reduce the potential delays to general background traffic on the road network that can be caused by the movement of these oversized loads.

12.2.3 As the previously stated mitigation still applies, the findings of the EIA Report Chapter 12, set out below, remain valid:

“No significant adverse effects are predicted for users of the A82/A87/A887 from construction traffic movements from the Proposed Development alone, and from the Proposed Development and potential cumulative developments combined. Any perceptible adverse effects would be short lived during the construction phase, with the A887 not observed to be close to capacity”.

“The results indicate that during construction of the Proposed Development, neither total nor HGV traffic flows are predicted to increase by more than 30% at any location on the A82/A87/A887. Therefore, no significant adverse effects are anticipated. Nevertheless, standard mitigation and enhancement measures are proposed.”

12.3 Comparison of Effects

12.3.1 While the reduction in the number of turbines would result in a reduction of the level of traffic impact during construction, the reduction would not be enough to change the assessment of residual effects set out in the EIA Report Chapter 12. The standard mitigation measures as set out in the EIA Report remain unchanged and committed to by the Applicant.

13 Socio-Economic, Tourism and Recreation

13.1 Introduction

13.1.1 The economic impacts of the construction, operation and decommissioning of the 15 turbine Proposed Development have been estimated and assessed, using the same methodology as outlined in the EIA Report Chapter 13. The socio-economics baseline has been re-evaluated to account for changes since the production of the EIA Report, however the changes are marginal, therefore do not change the sensitivity of the receptors as assessed.

13.1.2 The starting point for estimating the likely economic activity supported by the Proposed Development was to consider the level of expected expenditure during the construction and development, operation and maintenance, and decommissioning phases, broken down into their main components. This was based on recent experience of similar developments. On this basis it was possible to make reasonable assumptions on the values of contracts that would be available.

13.1.3 Based on experience of comparable developments and an analysis of the structure of the Highland and Scottish economies (that is, the presence of suppliers and employees in relevant sectors), it was possible to make estimates of the amount of each component contract that could be secured by companies in Highland and Scotland.

13.1.4 There are two sources of economic activity: the first arising from each of the component contracts and the jobs they support; the second is from anticipated spending in the relevant study areas of people employed in these contracts (the income effect).

13.1.5 The economic and jobs impacts, including the wider income effects were calculated from expected contract values based on published economic statistics that provide details on turnover,

employment and multiplier effects for the sectors of the economy relevant to the component contracts.

- 13.1.6 This methodology is well established in estimating the expected economic impacts of onshore wind developments and is described in more detail in the EIA Report Chapter 13.

13.2 Assessment of Residual Effects

Construction

- 13.2.1 The capacity of the Proposed Development will depend on the turbine model and what is available at the time of construction. For the purposes of the AIR, the socio-economic analysis has been based on 15 turbines with a total installed capacity of 84MW. This assumes the same turbine generator size as outlined and assessed in the EIA Report Chapter 13. A development of this capacity would be expected to have a capital cost of £79.6 million.
- 13.2.2 It was estimated that the economic impact associated with this expenditure (including the direct impact and the impact of staff spending) would be £11.8 million GVA and 171 years of employment in Highland, and £30.5 million GVA and 412 years of employment in Scotland.
- 13.2.3 The economic impact is marginally lower for the 15 turbine Proposed Development. However, the magnitude of economic and employment effects in Highland and Scotland are similar and therefore the effects have been assessed as the same as the 18 turbine Proposed Development, namely minor (beneficial) to the Highland economy and negligible (beneficial) to the Scottish economy.

Operation

- 13.2.4 It was estimated that the annual economic impact associated with operation and maintenance of the 15 turbine Proposed Development (including the direct impact and the impact of staff spending) would be £0.6 million GVA and 10 jobs annually in Highland, and £1.0 million GVA and 17 jobs in Scotland.
- 13.2.5 The economic impact is marginally lower for the 15 turbine Proposed Development. However, the magnitude of economic and employment effects in Highland and Scotland are similar and therefore the effects have been assessed as the same as the 18 turbine Proposed Development, namely negligible (beneficial) to the Highland and Scottish economies.

Decommissioning

- 13.2.6 The 15 turbine Proposed Development would also have an economic impact during the decommissioning phase. Very few onshore wind projects to date have been fully decommissioned in the UK and, as a result, there is minimal data regarding the economic costs and impacts associated with this phase. Given that decommissioning activity would take place in future decades, it is difficult to predict what local economic conditions at that time would be. For these reasons, the decommissioning costs and impacts have not been quantified in this assessment.
- 13.2.7 The scale of the economic activity during the decommissioning phase would likely be less than that during the construction phase. The effects had been assessed as negligible (beneficial) for the 18 turbine Proposed Development. The economic impact is likely to be only marginally lower for the 15 turbine Proposed Development and therefore the effects have been assessed as the same as the 18 turbine Proposed Development.

13.3 Updated Community Benefit Fund Assessment

- 13.3.1 The potential community benefits and non-domestic rates associated with the 15 turbine Proposed Development have been estimated using the same methodology and assumptions as in the 18 turbine Proposed Development, but on the basis of an 84MW capacity.
- 13.3.2 The Applicant is committed to a community fund that would build on the existing Bhlaraidh Wind Farm Community Fund. The scale of effect associated with a community benefit fund is dependent on the investment choices of the community. The effect of the community benefit fund was assessed as negligible (beneficial) for the 18 turbine Proposed Development. The value of the fund

associated with the 15 turbine Proposed Development is unlikely to be greater and therefore the effects have been assessed as the same.

- 13.3.3 Based on consultations with those in the industry for recently commissioned wind farms, it was estimated that the annual payments are expected to be approximately £0.6 million annually, and £29.4 million over 50 years². This is only slightly lower than the estimated value in the EIA Report Chapter 13 and so the effect on the Highland economy has also been assessed as negligible (beneficial).

14 Climate Change

14.1 Introduction

- 14.1.1 EIA Report Chapter 14 provides a background on the climate change assessment and the anticipated whole life carbon balance of the 18 turbine Proposed Development. This AIR Section provides an updated estimation of the whole life carbon balance of the 15 turbine Proposed Development and the comparative changes due to the proposed layout amendments.

- 14.1.2 Following the same methodology as set out within EIA Report Chapter 14, with revisions to the input parameters as required, the Scottish Government’s online Carbon Calculator Tool V1.6.1 has been completed for the 15 turbine Proposed Development (ref. 2K6B-E55Z-NBQO v11). AIR Appendix 14.1 provides an overview of the revised input parameters.

14.2 Assessment of Residual Effects

- 14.2.1 The output from the Carbon Calculator indicates taking account of the expected total CO₂ loss, the 15 turbine Proposed Development would be expected to result in approximately 44,349 fewer tonnes of carbon dioxide (tCO₂) per annum than the 18 turbine Proposed Development (refer to AIR Appendix 14.2). The expected carbon payback time would reduce from 2.5 years to 2.4 years.

- 14.2.2 Table 14.1 below shows how the removal of the three turbines changes the Carbon Calculator results from the 18 turbine Proposed Development to the 15 turbine Proposed Development.

Table 14.1 Summary of the Changes in Carbon Calculator Results

Carbon Calculator Result	18 Turbine Proposed Development (expected)	15 Turbine Proposed Development (expected)	Summary of Changes
Net emissions of carbon dioxide (tCO ₂ eq.)	259,871	215,522	Reduction of 44,349 tCO ₂ eq.
Carbon Payback Period of Proposed Development Comparison			
Displacing coal-fired electricity generation (years)	1.2	1.2	No change

² The business rates calculation has been updated. The previous socio-economic assessment included an estimate of business rates that was based on the rateable value of existing wind farms. The revised assessment assumes a lower valuation since the existing wind farms qualified for Renewables Obligation support, which has the effect of increasing revenues and so increasing valuation, compared to a wind farm which does not qualify. The Renewables Obligation scheme is no longer in operation and the rates estimates have been revised accordingly. The figures provided are estimates and the actual rates paid will depend on the decisions of the assessors and future poundage rates.

Carbon Calculator Result	18 Turbine Proposed Development (expected)	15 Turbine Proposed Development (expected)	Summary of Changes
Displacing grid-mix of electricity generation (years)	4.4	4.3	Reduction of 0.1 years
Displacing fossil fuel-mix of electricity generation (years)	2.5	2.4	Reduction of 0.1 years

14.3 Comparison of Effects

14.3.1 The conclusion of the carbon balance assessment as per the EIA Report Chapter 14 remains unchanged in that the Proposed Development will have an overall beneficial effect on climate change.

15 Aviation and Radar

15.1 Introduction

15.1.1 This Section of the AIR sets out how the aviation and radar effects arising from the 15 turbine Proposed Development layout compare with those described for the 18 turbine Proposed Development layout as assessed in the EIA Report (Chapter 15: Aviation and Radar (EIA Report Volume 1)).

15.2 Assessment of Residual Effects

Overview

15.2.1 The EIA Report assessed the potential significant effects of the 18 turbine Proposed Development on three aviation receptors:

- the primary surveillance radar at Inverness Airport;
- the primary surveillance radar at RAF Lossiemouth; and
- low flying aircraft.

Primary Surveillance Radar

15.2.2 As regards the two primary surveillance radars, the EIA Report found that neither would have line of sight to the 18 turbine Proposed Development. Consequently, the magnitude of these effects was zero and the significance was nil. Since the 15 turbine Proposed Development consists of removing three turbines and retaining the positions and dimensions of the remaining 15 turbines, these conclusions remain valid and are not considered further in this additional information.

Low Flying Aircraft

15.2.3 As regards effects on low flying aircraft, the EIA Report noted that, since the turbines had heights of 150m or more above ground level, they were subject to the mandatory lighting requirements of Article 222 of the Air Navigation Order. In order to reduce the visual impact of any visible spectrum lighting on the Proposed Development, an aeronautical study was carried out and a proposal submitted to the Civil Aviation Authority (CAA) for the lighting scheme on the 18 turbine Proposed

Development to consist of infra-red lighting only, which is not visible to the unaided human eye. That scheme was approved by the CAA on 25 June 2021.

- 15.2.4 The CAA-approved lighting scheme included provision of lights to delineate the perimeter of the combined Operational Development and 18 turbine Proposed Development. This scheme included lights on Turbines T13, T14 and T18. Since the 15 turbine Proposed Development will remove those turbines, the lighting scheme has been re-designed to ensure it defines the perimeter of the combined Operational Development and 15 turbine Proposed Development for aircrew flying in the vicinity at low altitude at night.
- 15.2.5 The CAA-approved lighting scheme for the 18 turbine Proposed Development was designed as a single scheme to delineate the perimeter of the combined Operational Development and 18 turbine Proposed Development. The scheme was based on the existing infra-red lights on seven turbines of the Operational Development, plus provision of infra-red lights on Turbines 3, 5, 6, 8, 9, 12, 13, 14, 16 and 18 of the 18 turbine Proposed Development, marking the northern, eastern and southern perimeter of that development.
- 15.2.6 The removal of Turbines 13, 14 and 18 moves the eastern boundary of the Proposed Development approximately 500 m to the west. The eastern boundary will now be marked by Turbines 15 and 17. To retain the purpose of the lighting scheme on the 15 turbine Proposed Development, infra-red lights will now be installed on Turbines 3, 5, 6, 8, 9, 12, 15, 16 and 17. The proposed revisions of the lighting scheme for the 15 turbine Proposed Development is illustrated in AIR Figure 2.1.
- 15.2.7 The CAA and the Ministry of Defence (MoD) have been consulted on the revised lighting scheme for the 15 turbine Proposed Development.
- 15.2.8 The revised lighting scheme will ensure that the magnitude of the effect of the 15 turbine Proposed Development on low flying aircraft at night remains low and the significance of the effect will be negligible, as was the case for the 18 turbine Proposed Development.

15.3 Comparison of Effects

- 15.3.1 The conclusions of the aviation assessment set out in EIA Report Chapter 15 remain unchanged in that the 15 turbine Proposed Development will have no effect on any primary surveillance radar and will have an effect of negligible significance on low flying aircraft at night.

16 Schedule of Environmental Commitments

- 16.1.1 EIA Report Chapter 16 provided a Schedule of Environmental Commitments for the 18 turbine Proposed Development, summarising the mitigation measures to which the Applicant had committed to implement and upon which the assessment of residual effects was based.
- 16.1.2 The removal of three turbines and their associated infrastructure from the Proposed Development has not fundamentally changed the majority of mitigation measures to be implemented as detailed within EIA Report Chapter 16. One change that is required relates to the proposed aviation lighting scheme:
- “The Proposed Development will be provided with a lighting scheme similar to that of the Operational Development, consisting of infra-red lighting on the turbines marking the perimeter of the wind farm, and for visible lighting to be excluded from the lighting scheme.*
- In consultation with potential users of the night low level airspace, a proposed lighting scheme consisting of infra-red lights on Turbines 3, 5, 6, 8, 9, 12, 13, 14, 16 and 18 has been designed.”*
- 16.1.3 As detailed in AIR Section 15, with the removal of T13, T14 and T18, the proposed lighting scheme has been revised to include infra-red lights on Turbines 3, 5, 6, 8, 9, 12, 15, 16 and 17. The final lighting scheme will be agreed in consultation with stakeholders.

17 Summary

- 17.1.1 In conclusion, this AIR considers the removal of three turbines (T13, T14 and T18) and their associated infrastructure, and presents a review of any likely changes to the assessment of impacts that was presented in the EIA Report.
- 17.1.2 The likely significant residual effects reported within the EIA Report (refer to EIA Report Chapter 17) identified no significant effects during the construction phase and only three significant effects during the operational phase:
- LVIA VP 5 (Suidhe Viewpoint, B862) - moderate, significant;
 - LVIA VP 7 (B862 south of Foyers) - moderate, significant; and
 - LVIA R13 (a range of properties on or in the vicinity of the B862 minor public road in the area near Whitebridge) - locally moderate, locally significant.
- 17.1.3 The reduction in turbine number and associated infrastructure from the 18 turbine Proposed Development to the 15 turbine Proposed Development will be beneficial, resulting in marginal reductions in the level of assessed residual effects including:
- Construction effects on Slavonian Grebe is reduced from minor to negligible (not significant);
 - Visibility from cultural heritage Site 3 (Dell Farm, burial ground) and Site 9 (Whitebridge, old bridge over the River Foyers) is removed, reducing from negligible to no effect; and
 - Visual impact at LVIA VP 6 is reduced from minor-moderate to minor (not significant).
- 17.1.4 Although the removal of turbines will provide small improvements in visual composition and extent of the turbines from key viewpoints, there is no change to the likely significant residual effects for LVIA VP 5, VP 7 or R13, as reported within the EIA Report.
- 17.1.5 The reduced layout footprint of the 15 turbine Proposed Development is anticipated to provide a benefit to sensitive habitats and species compared to the 18 turbine Proposed Development, with a reduction in the impacted area of wet heath and wet modified bog habitat, the number of watercourse crossings, and the required excavated volumes of peat. The reduced footprint does not, however, alter the significance of the effects reported in the EIA Report.
- 17.1.6 In summary, these revisions do not fundamentally change the conclusions of the EIA Report technical chapters and those reported within EIA Report Chapter 17. The conclusions of the EIA Report therefore remain valid.

18 References

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