

## PRE-APPLICATION RESPONSE MATRIX

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1	<p>This application should be considered against the following Development Plan documents:</p> <ul style="list-style-type: none"> <li>• Highland-wide Local Development Plan (HwLDP) (2012);</li> <li>• Caithness and Sutherland Local Development Plan (CaSPlan) (2018); and</li> <li>• relevant Supplementary Guidance, particularly the Onshore Wind Energy Supplementary Guidance (2016).</li> </ul>	THC – Planning Policy	7	<p>The principle of a wind farm extension has been accepted through the relevant s.36 consent. Planning policy in relation to the Proposed Varied Development is considered within the EIA Report, in particular Chapter 5: Planning. A Planning Statement will be submitted with the s.36C application.</p>	
2	<p>Visualisations provided should accord with the Council’s latest Visualisation Standards for Wind Energy Developments.</p>	THC – Planning Policy	7	<p>The list and method of production for visualisations (i.e. wirelines and photomontages) to be included in the Application has been agreed with THC and SNH by email on 21st September 2018 and 20th September 2018 respectively (see Appendix 7.1). Visualisations prepared in accordance with the Council’s Visualisation Standards are included in Volume 3B: Visualisations (THC Methodology).</p>	
3	<p>It is important for the applicant of any wind energy proposal to maintain an up to date picture of development in the wider area, particularly for informing cumulative impact assessment. A starting point for this is the Council’s Highland Wind Map – which has recently been updated to January 2018.</p>	THC – Planning Policy	7	<p>The principle of a wind farm extension has been accepted through the relevant s.36 consent. Notwithstanding this, the cumulative baseline situation has been reviewed and remains unchanged within close proximity to the site from that assessed in the 2015 ES. Cumulative effects of the Proposed Varied Development are assessed where relevant in the EIA Report.</p>	
4	<p>The site lies predominantly within a Group 2 Area of Significant Protection. This is due to most of it being located within an area of carbon rich soils, deep peat and priority peatland habitat (CPP) which is a Group 2 constraint. Attention is drawn to paragraph 4.34 on page 24</p>	THC – Planning Policy	7	<p>The wind farm infrastructure impact on all Group 2 features was assessed in the 2015 ES. The Proposed Varied Development reduces the amount of infrastructure and thereby its impact on Group 2</p>	Condition 23

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	<p>of the SG which outlines the expectations for safeguarding the peat resource. It sets out a list of key factors which need to be taken into account for proposals affecting peatland.</p> <p>It will be necessary to assess the impacts on all Group 2 features, identify appropriate mitigation, and set out how this mitigation provides sufficient protection to the feature.</p>			<p>features compared to the Consented Development. Therefore the 2015 ES is relied upon. Condition 23 will remain to provide a CEMP that will direct and provide a control mechanism for the impact of construction activities on the environment. As part of this CEMP, a Peat Management Plan will be prepared.</p>	
5	<p>Given that this application is for a reconfiguration of a consented scheme and involves the reduction in the number of turbines and an increase in the height of some remaining turbines, it would be useful if the applicant outlined whether the new scheme was expected to have a positive or negative impact on each of the relevant Supplementary Guidance (SG) criterion (see pages 18-20 of the SG) compared to the consented scheme.</p>	<p>THC - Policy and Natural Heritage (Landscape)</p>	7	<p>Planning policy is considered within the EIA Report (see Chapter 5). A Planning Statement is also submitted with the application.</p>	
6	<p>This proposal is immediately adjacent to existing schemes, and opportunities to share existing infrastructure should be explored and where opportunities are not taken, a reasoned justification should be provided.</p>	<p>THC - Policy and Natural Heritage (Landscape)</p>	7	<p>The principle to extend the operational wind farm along with use of existing operational infrastructure has been accepted. The Proposed Varied Development maintains use of existing infrastructure, namely tracks, substation and Borrow Pits.</p>	
7	<p>The Council's Sustainable Design Guide: Supplementary Guidance provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development.</p>	<p>THC - Sustainability</p>	8	<p>The Supplementary Guidance has been noted and where relevant taken into account in developing the proposals, both in the 2015 ES and this EIA Report.</p>	
8	<p>The impacts of this development should be assessed against the Special Area of Conservation (SAC) as part of a Habitats Regulation Appraisal. A Species Protection Plan will be required within the EIA Report to ensure that this development can be taken forward with SAC otters living alongside. We also recommend that otter surveys within and adjacent to the development boundary should be updated to inform an appropriate mitigation plan.</p>	<p>Scottish Natural Heritage</p>	9	<p>The EIA Report includes an assessment of potential impacts on the SAC within Chapter 8: Ecology. An updated otter survey was carried out in October 2018, the results of which have informed the preparation of a Species Protection Plan (included as Appendix 8.1). A report to inform the HRA has also been produced as Appendix 8.3.</p>	

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9	<p>We do not consider that additional bird survey work will be required to inform the impacts of this proposal, despite it being five years old. The original bird vantage point survey work covered the whole of the new swept area; therefore collision risk can be recalculated using the new turbine dimensions. In addition, the original survey work only recorded a single flight of an SPA qualifying species (i.e. golden plover). We therefore do not think it is reasonable to request additional bird survey work in this specific instance. However, the recalculated impacts of this development should be assessed as part of a Habitats Regulation Appraisal within the EIA Report.</p>	Scottish Natural Heritage	9	<p>These comments were taken into account in the EIA process and in particular the production of Chapter 10: Ornithology.</p> <p>As discussed in Chapter 10 (para. 10.4.4 and 10.4.5), since the operation of Gordonbush Wind Farm, post-construction monitoring of the operational site has recorded golden eagle flight activity, initially during standard vantage point watches and subsequently through targeted golden eagle surveys. The data showing golden eagle activity to the south and east of the Proposed Varied Development has therefore also been used to scope the assessment in terms of species covered.</p> <p>In light of the conclusions of Chapter 10 that there are no likely significant effects on the integrity or conservation objectives of the SPA a Habitats Regulations Appraisal is considered unnecessary.</p>	
10	<p>The wireframe view-points clearly indicate that the proposed scheme will reduce the visual spread of turbines from the consented layout. This is especially welcomed from the highly sensitive location of VP11 which is within the interior of the adjacent Wild Land Area (WLA). The loss of the four turbines and the increase in height of the remaining 12<sup>1</sup> are considered to result in an overall improvement in the layout and a slight reduction in the landscape and visual impact. This is likely to be especially the case for impacts identified on the qualities of the WLA. However, we continue to advise that there will be additional adverse landscape and visual effects as a result of this proposal, but these are not considered to exceed those of the original consented scheme.</p>	Scottish Natural Heritage	9	<p>The EIA Report includes a LVIA of the Proposed Varied Development in Chapter 7. Visualisations and wireframe views are provided in Volume 3A (SNH Methodology) and Volume 3B (THC Methodology).</p>	

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

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11	Even though the previous bat survey found a healthy representation of animals using this upland site, we do not think completing another bat survey will necessarily make any difference to the layout. However, we do advise that turbine stand-off distances from bat features (e.g. minor water courses) should be re-assessed in relation to the wider rotor sweep of the larger turbines, taken from turbine tip.	Scottish Natural Heritage	9	The EIA Report assesses the potential effects on bats in light of the increased tip height/rotor dimensions in Chapter 8: Ecology, utilising existing survey data.	
12	Additional surveys will be required to ensure that water voles are safeguarded during construction works. We advise that pre-construction surveys should take place to help inform a Species Protection Plan, if one is required.	Scottish Natural Heritage	9	A commitment to carry out pre-construction surveys for water voles is made within the CEMP, secured through Condition 23.	Condition 23 / SoM EN10
13	Since this original extension went to planning much of our guidance on wind farms has since been updated. For example, there is updated guidance on peatland and carbon-rich soils, see; <a href="https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm">https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm</a>	Scottish Natural Heritage	9	This has been noted and updated guidance taken into account as necessary.	
14	Although not strictly relevant to this proposal, the Design Quality and Place Making policy (Policy 29) in the HwLDP requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.	THC (Design)	10	Condition 13 requires all details of buildings, compounds and parking areas to be approved by the Planning Authority prior to development commencing. There is no proposal to vary the terms of Condition 13. The Proposed Varied Development seeks to remove the consented additional Operations Building.	Condition 13
15	The applicant will be required to submit a noise assessment with regard to the operational phase of the development in order to demonstrate any change in predicted noise levels as a result of the proposed amendment. The assessment should be carried out in accordance with ETSU-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics.  The existing consent already has noise limits attached and the	THC – Amenity (Noise)	11	The EIA Report includes a Noise Impact Assessment (Chapter 13: Noise), including an updated cumulative assessment.	Condition 25 (Noise)

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	<p>expectation is that noise levels will be lower due to the reduction in turbines and the increase in separation distances. If there have been any other wind turbine developments consented since the original Gordonbush Extension application obtained consent any cumulative noise would need to be addressed by the assessment.</p> <p>The assessment must include a compliance monitoring mitigation scheme which will demonstrate how noise levels from the development will be identified should a complaint arise.</p>			<p>Condition 25 is the subject of proposed variation and continues to follow IOA Good Practice guidance for compliance monitoring mitigation for noise.</p>	<p>SoM Ref N3</p>
16	<p>Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.</p>	<p>THC – Amenity (Noise)</p>	11	<p>The EIA Report includes an updated assessment on construction noise in Chapter 13: Noise.</p>	<p>SoM Ref N1</p>
17	<p>The application should include updated information on the presence of any private water supplies that could be affected by the development.</p>	<p>THC – Amenity (Private Water Supplies)</p>	11	<p>Private water supply data has been requested from SEPA and THC. A review of this data in light of the Proposed Varied Development has been undertaken and is reported on within Chapter 9: Hydrology, hydrogeology and Geology.</p>	
18	<p>Any application should include a scheme for the suppression of dust.</p>	<p>THC – Amenity (Dust)</p>	11	<p>A dust management plan will be prepared as part of the CEMP, in accordance with Condition 23.</p>	<p>Condition 23 / SoM OI3</p>
19	<p>The access is the same as for the existing windfarm and the permitted extension. Revised swept paths will be required to be submitted with any application for the larger turbines.</p>	<p>THC – Transport and Wider Access (Traffic and Transport)</p>	12	<p>A swept path assessment is included within Appendix 12.1: Route Survey Report.</p>	<p>SoM T1-T5</p>
20	<p>The EIA shall include a Transport Assessment. This shall be a stand-alone chapter and shall consider in detail the impact of development traffic on the Council maintained roads affected. It shall consider and propose measures necessary to mitigate the impact of the development. These measures may include; new or improved infrastructure, road safety measures and traffic management. The attached guidance document provides further information on the</p>	<p>THC – Transport and Wider Access (Traffic and Transport)</p>	12	<p>The EIA Report includes an updated Transport Assessment to reflect the proposed variation (see Chapter 12: Traffic and Transport). Any mitigation measures will be controlled through Condition 17, to which no variations are proposed.</p>	<p>Condition 17 / SoM T1-T5</p>

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	<p>required content. It is acknowledged that a reduced scope may be applicable due to the extant permissions. The applicant should contact the Transport Planning Team and Transport Scotland to agree the detailed contents of the TA.</p>				
21	<p>The port of entry shall be identified for the abnormal loads (it was previously Invergordon). Routes for goods vehicles as well as the abnormal loads shall be confirmed and where additional traffic or larger loads are proposed then the suitability of the routes for the additional traffic shall be assessed.</p> <p>It appears that the original TA did not include ready mix concrete or import of stone for the access routes any assumptions regarding on site quarries or batching should be stated. The volume of construction traffic for the revised proposals should be submitted and any assumptions should be confirmed or a conservative approach taken.</p>	THC – Transport and Wider Access (Traffic and Transport)	12	See Chapter 12: Traffic and Transport and Appendix 12.1: Route Survey Report.	SoM T1-T5
22	<p>A new assessment of the suitability of the routes will be required as these proposals are for larger turbines. Therefore an assessment of the capacity of any existing bridges and other structures along the construction routes may be required. A swept path analysis of the route will be required.</p>	THC – Transport and Wider Access (Traffic and Transport)	12	See Appendix 12.1: Route Survey Report.	SoM T1-T5
23	<p>Where these works (road improvements) are outside the current road boundary then the red line boundary of the application will need to cover these items or separate planning permission will be required. The scope of any mitigation works and control of the land required for them should therefore be demonstrated at the planning application stage.</p> <p>All works on the Council maintained public road will require the approval of the Council as Roads Authority through a Road Construction Consent together with any necessary Technical Approval for works on structures. Therefore detailed and dimensioned plans showing any mitigation proposals on and adjacent to the public road will be required to be agreed prior to any works commencing on site.</p>	THC – Transport and Wider Access (Traffic and Transport)	12	No change to the redline application boundary is sought under the s.36C application. Any works outside of the current road boundary will be evaluated to determine if planning permission is required. The implementation of any mitigation measures will be controlled through Condition 17.	Condition 17 / SoM T1-T5

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24	The TA should include a framework CTMP aimed at minimising the impact of the construction traffic. It shall include measures to ensure development traffic adheres to the approved routes and to prevent platooning during heavier flows such as any ready mix concrete pours. Consultation with the local community and the Local Area Roads Office will be required for the detailed content and implementation of the CTMP.	THC – Transport and Wider Access (Traffic and Transport)	12	Condition 17 requires the production of a Traffic Management Plan prior to the Commencement of Development.	Condition 17 / SoM T1-T5
25	In order to protect the interests of the Council, as roads authority, a suitable agreement relating to Section 96 of the Roads (Scotland) Act and appropriate planning legislation - including the provision of an appropriate Road Bond or similar security (known as a Wear and Tear Agreement) may be required. Construction should not run concurrently with other projects generating a significant increase in HGV traffic, alternatively a joint CTMP and Wear and Tear Agreement for the schemes to run concurrently would be required.	THC – Transport and Wider Access (Traffic and Transport)	12	Condition 17 requires the production of a Traffic Management Plan, including the provision of a bond or similar.	Condition 17 / SoM T1-T5
26	Transport Scotland is in agreement with this approach, with the proviso that an Abnormal Indivisible Load Assessment be provided to confirm that the proposed route is capable of accommodating the increased size in turbine components. The details required will include a swept path analysis and identification of potential mitigation measures including the temporary removal of street furniture, any proposed junction widening, traffic management etc. to ensure that transportation will not have any detrimental effect on structures within the trunk road route path.	Transport Scotland	12	The EIA Report includes an Abnormal Indivisible Loads Assessment. (See Appendix 12.1).	Condition 17 / SoM T1-T5
27	Should any infrastructure be located within close proximity to a watercourse, we would request that a Flood Risk Assessment is submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere.	THC – Water (Flood Risk)	13	The 2015 ES concluded that there are no potential sources of flood risk to the development site. These results were reviewed in relation to the Proposed Varied Development and reported on within Chapter 9.	SoM HHG3, HHG8 and HHG9
28	Analysis of the impact of any proposed new bridges/crossings should be submitted for review.	THC – Water (Flood Risk)	13	No additional crossings are proposed.	

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29	We would request that a Drainage Impact Assessment (DIA) is submitted. The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The Applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.	THC – Water (Flood Risk)	13	The principle to extend the operational wind farm has been accepted through the relevant s36 consent. The variation would result in less of an impact to hydrology in terms of reduced track length and reduced number of turbines. Therefore the 2015 ES is relied upon. A drainage strategy will be prepared as part of the CEMP, in accordance with Condition 23.	Condition 23 / SoM HHG2
30	A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse/waterbody. Storage of materials within this area during construction is not permitted.	THC – Water (Flood Risk)	13	The design of the consented turbine layout identified a 50m buffer between all watercourses visible on OS 1:50,000 mapping and the positioning of a turbine. Condition 11 requires any micro-siting of turbines, access tracks and crane hard standing areas to maintain the 50m buffer, except in the vicinity of approved crossing points.	Condition 11 / SoM EN3
31	<p>We would ask that the planning conditions that we previously requested, dated 12 August 2015 (PCS/141196), are adopted with any grant of consent. These include conditions that would require:</p> <ul style="list-style-type: none"> <li>• A full site specific CEMP is submitted for approval to the planning authority prior to commencement of the development;</li> <li>• All works be carried out in accordance with the ES Schedule of Mitigation;</li> <li>• A condition enabling the applicant to micro site the built elements up to 50m to allow for avoidance of sensitive features;</li> <li>• A finalised Peat Management Plan be agreed with the Planning Authority in consultation with SEPA;</li> <li>• New tracks on peat greater than 1m be of a floating style of construction;</li> <li>• A 50m buffer around all waterbodies except in the vicinity of watercourse crossings; and</li> </ul>	SEPA – Site Specific Requirements	13	<p>Conditions 8, 11 and 23 cover these requirements with the exception of the floating track on peat greater than 1m deep requirement.</p> <p>Generally, a ‘floating track’ design does not involve excavation and would be utilised on the site in areas where peat depth is greater than 1m, where practical. Geotextile material is laid onto the unbroken existing surface at a width to suit the track. Layers of crushed stone would then be laid on the geotextile to form a track capable of supporting the turbine delivery vehicles and construction plant. This type of track construction is typically used in peaty areas across Scotland including other constructed wind farm developments and public roads. The benefits of the floating track design are that it allows access track construction on soft terrain and does not require excavation of deep peat</p>	Conditions 8, 11 and 23



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	<ul style="list-style-type: none"> <li>A Decommissioning and Restoration Plan be prepared and submitted at least two years prior to the end of the design life of the development.</li> </ul>			<p>as the surface layer is not broken, resulting in reduced peat volumes for re-use across the site. There is minimal disruption of the sub-surface flow of water within the peat body, and no new channels are formed by which water can drain from the peat mass.</p>	
32	<p>We note that in our response of 12 August 2015 (PCS/141196) we requested a condition be applied requiring all new tracks on peat of greater than 1m to be of a floating style of construction. In review of the conditions listed within the consent under section 36, we note that this condition has not been attached, and we ask that this be adopted.</p>	SEPA – Site Specific Requirements	13	<p>This principle will be adopted where practicable, and is relevant to Condition 23, which requires the production of a Peat Management Plan. Whilst the Applicant will endeavour to float all tracks on peat with a depth greater than 1m, this is not always feasible due to peat stability risk associated with a combination of peat depth, gradient and underlying soil parameters. In addition, consideration will be given to the transition lengths between floating and founded track construction where a proportion of this transition may be in areas where the peat is in excess of 1m. Where isolated pockets of peat are greater than 1m in depth it may not be possible to transition from a cut track to a floated track due to the length of transition required.</p>	
33	<p>We are therefore satisfied that, as stated in our previous response, dated 12 August 2015, that the amount of disturbed peat will be able to be appropriately utilised on site. However, we expect this to be clearly updated and accounted for in the conditioned peat management plan.</p>	SEPA – Site Specific Requirements	13	<p>A peat management plan will be prepared as part of the CEMP, in accordance with Condition 23.</p>	Condition 23 / SoM HHG1 and HHG5
34	<p>Since our last response in 2015, we now have SEPA Guidance on the life extension and decommissioning of onshore wind farms that must now be taken into account.</p>	SEPA – Site Specific Requirements	13	<p>Condition 8 requires a decommissioning, restoration and after care strategy to be developed in agreement with THC, SEPA and SNH.</p>	Condition 8
35	<p>You may need a Construction Site Licence under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). Please see our regulatory requirements below for further detail.</p>	SEPA – Site Specific Requirements	13	<p>This is noted and would be applied for as required.</p>	

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36	Existing built infrastructure should be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works in previously undisturbed ground.	SEPA – Detailed Generic Scoping Requirements for Windfarm Development	13	The principle to extend the operational wind farm along with use of existing operational infrastructure has been accepted. The Proposed Varied Development maintains use of existing infrastructure, namely tracks, substation and Borrow Pits. The infrastructure footprint, compared to the Consented Development, is reduced overall.	
37	Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.	SEPA – Site Layout	13	Condition 11 provides the mechanism for evaluating any changes to infrastructure post consent.	Condition 11
38	Where activities such as watercourse crossings, watercourse diversions, water abstractions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and appropriate mapping in accordance with SEPA's requirements.	SEPA – Engineering activities which may have adverse effects on the water environment	13	A drainage strategy and details of watercourse crossings will be prepared as part of the CEMP in consultation with SEPA, in accordance with Condition 23.	Condition 23
39	Watercourse crossings should be designed to accommodate the 1 in 200 year flow, or information provided to justify smaller structures.	SEPA – Engineering activities which may have adverse effects on the water environment	13	No new watercourse crossings are required for tracks. The Consented Development access tracks were designed to ensure that no new watercourse crossings are required, with the existing access tracks constructed as part of the adjacent Gordonbush Wind Farm utilised. The s.36C variation reduces the amount of access track infrastructure required.	
40	If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application.	SEPA – Engineering activities which may have adverse effects on the water environment	13	The 2015 ES concluded that there are no potential sources of flood risk to the development site. Flood risk is discussed in Chapter 9.	
41	The planning submission should a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential	SEPA – Disturbance and re-use of	13	The s.36C variation seeks no change to turbine positions, tracks, or borrow pits but reduces the	Condition 23 / SoM HHG1

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	release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat.	excavated peat and other carbon rich soils		amount of infrastructure in terms of tracks and turbines. In addition to the assessment of the reduced layout a) is reported within the 2015 ES (Consideration of Alternatives), and b) measures will be included within the CEMP (Condition 23), and specifically the Peat Management Plan. Therefore the 2015 ES is relied upon.	and HHG5
42	<p>The submission must include:</p> <p>a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.</p> <p>b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of any peat to be re-used and how it will be kept wet must be included.</p> <p>To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Developments on Peat and Off-Site uses of Waste Peat.</p>	SEPA – Disturbance and re-use of excavated peat and other carbon rich soils	13	The position of the turbines, tracks and borrow pit search areas will be as per the Consented Development, albeit the number of turbines and track length is reduced (see Figure 1.3). Therefore, the 2015 ES is relied upon and it is not considered necessary to provide this information again. An updated Peat Management Plan would also be prepared as part of the pre-construction CEMP, secured under existing Condition 23.	Condition 23 / SoM HHG5
	<p>The following information must be included in the submission:</p> <p>a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater water abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site</p>	SEPA – Disruption to Groundwater Dependant Terrestrial Ecosystems (GWDTE)	13	The position of the turbines, tracks and borrow pit search areas will be as per the Consented Development, albeit the number of turbines and track length is reduced. Therefore, the 2015 ES is relied upon and it is not proposed to provide this information again.	SoM HHG8

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	<p>boundary where the distances require it.</p> <p>b) If the above minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p>				
43	<p>Key-holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality.</p>	SEPA – Forest removal and forest waste	13	Not applicable. No tree felling proposed.	
44	<p>In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 Controlling the Environmental Effects of Surface Mineral Workings (PAN 50) a Site Management Plan should be submitted in support of any application. A map of all proposed borrow pits must be submitted.</p>	SEPA – Borrow pits	13	<p>Borrow Pit Search Areas are as detailed in the 2015 ES for the Consented Development. Condition 14 requires a working and restoration plan for each borrow pit. A Borrow Pit Report is included in Appendix 9.1 of this EIA Report. Any further information will be provided in accordance with Condition 14 prior to construction.</p>	Condition 14
45	<p>Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).</p>	SEPA – Regulatory requirements	13	This is noted and all necessary authorisations will be applied for.	
46	<p>Extensive archaeological; and historic features are recorded within this proposed development area. Some of these were identified during survey work in advance of the existing Gordonbush Wind Farm. This survey was not comprehensive over the proposed extension area. The Cultural Heritage should be assessed as part of an Environmental Statement and undertaken by a professional and competent historic environment consultant. The ES chapter will need to follow Highland Council Standards for Archaeological Work, specifically Section 4 which deals with Environmental Statements and Section 3.</p> <p>The assessment will include a walkover survey of the development area (including any land required for associated infrastructure) to</p>	THC – Historic Environment	14	<p>Given that turbine, tracks and borrow pit positions remain unchanged from the Consented Development, with reduced turbine numbers and track length, it is not proposed to carry out further assessment of direct effects. No significant effects were identified in the 2015 ES and it is not considered that the Proposed Varied Development would cause likely significant direct effects not already reported upon. Therefore the 2015 ES is relied upon. Mitigation measures are secured through Condition 22 which requires a programme</p>	Condition 22

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	<p>assess the survival of any upstanding features. The assessment will consider the potential direct impacts of the development to cultural heritage as well as indirect impacts. The indirect impact assessment must include a study of cumulative impacts. Where indirect impacts are predicted, these will be illustrated using photomontages.</p>			<p>of works for the evaluation, preservation and recording of any archaeological and historic features affected.</p> <p>An assessment of indirect effects on cultural heritage is included within Chapter 11: Cultural Heritage in line with the points raised within the Advice Pack. Visualisations from Balnacoil Hill Cairn SM and Kilbraur Hut Circle SM are included, using photography undertaken for the 2015 ES.</p>	
47	<p>Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (i.e. re-design) and where appropriate, compensatory/off-setting.</p>	THC – Historic Environment	14	<p>Condition 22 requires the production of a programme of work for evaluation, preservation and recording of any archaeological and historical features.</p>	Condition 22
48	<p>However, it is not clear to us at this stage from the information provided so far, that the proposed increase in height of the turbines will not increase the potential effects on other historic environment assets in the surrounding area. We note that the LVIA section of the presentation identifies the potential for new or increased visibility and therefore the potential for increased effects. It is not clear to us at this stage why this would not also be the case for the historic environment.</p> <p>We would therefore recommend that some further work is carried out to identify if there is increased potential for the increased height of the turbines to have impacts on the setting of historic environment assets which were previously outside the ZTV or if there will be increased levels of effect on assets already identified.</p>	Historic Environment Scotland	14	<p>An assessment of indirect effects on cultural heritage is included within Chapter 11 in line with the points raised within the Advice Pack. Visualisations from Balnacoil Hill Cairn SM and Kilbraur Hut Circle SM have been prepared and will be included, using photography undertaken for the 2015 ES.</p>	
49	<p>We would also recommend that cumulative effects on the setting of historic environment assets are re-assessed given the number and proximity of other operational, consented and proposed wind developments in the surrounding area, including the proposed South Kilbraur wind farm.</p>	Historic Environment Scotland	14	<p>An updated cumulative assessment in relation to indirect effects is included within Chapter 11: Cultural Heritage.</p>	

No.	Request	Organisation / Department	Item Page No.	Response	Planning Condition / Schedule of Mitigation Reference
50	The application concerns alterations to a Section 36 consent however it would be advisable to undertake public consultation of the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application.	THC – Pre-application procedures / guidance	16	A public exhibition event was held within the local area to allow members of the general public to obtain information and pass comment upon the Proposed Varied Development. This exhibition took place on the 29th October 2018 at Brora Community Hall (3pm to 7pm).	
51	In terms of the appropriate Community Councils to consult, the proposal is located within the Brora Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted.	THC – Pre-application procedures / guidance	16	Community engagement was carried out as part of the application process and this engagement included discussion with Community Councils.	
52	In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs - both internal and external - as part of your proposal.	THC – Any other appropriate information	17	Noted.	