Chapter 6: Scoping and Consultation

Appendices

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6 Scoping and Consultation

6.1 Introduction

6.1.1 The EIA Regulations require that an ES should describe the likely significant effects of a proposed development on the environment. Scoping of potential issues against the physical and operational aspects of a proposed development provides a basis for ensuring that the assessment of environmental effects is appropriately limited to issues of genuine potential significance.

6.1.2 This Chapter of the ES describes the consultation process that was undertaken as part of the scoping exercise and includes a brief description of the environmental issues of potential significance associated with the Development which are to be addressed in detail in the ES.

6.2 Scoping

Pre-Scoping

6.2.1 As part of the scoping process, and prior to issuing a scoping report to the Energy Consents Deployment Unit (ECDU) and consultees, a pre-scoping meeting was held with the statutory consultees (The Highland Council, Scottish Natural Heritage (SNH) and Scottish Environment Protection Agency (SEPA)) during August 2013. The meeting provided an opportunity to discuss the project with the Applicant and identify potential key issues prior to submission of the scoping report. The meeting also included a site visit to enable a good appreciation of the site and its environs.

Scoping Report

6.2.2 In accordance with Regulation 7 of The EIA Regulations, the Applicant sought a scoping opinion from the Scottish Ministers on the environmental information to be provided in the ES. A scoping report was submitted in September 2013, and the Applicant confirmed the intention to submit a Section 36 application (under the Electricity Act 1989) following completion of the EIA process.

6.2.3 The specific aims of the scoping report were to:

- Set out the approach to the EIA, including the proposed content and structure of the ES;
- Summarise existing baseline information;
- Identify the issues which are to be assessed as part of the EIA;
- Agree the general approach to the assessment and the methodologies that would be used; and
- Identify those issues which should be scoped out of the EIA.

6.2.4 The scoping report was issued to the organisations listed in Table 6.1, following agreement on the consultee list by the ECDU.

Table 6.1: Consultees in Receipt of the Scoping Report

Statutory Consultees	
ECDU	The Highland Council
SNH	SEPA
Non Statutory Consultees	
Historic Scotland	Transport Scotland
Marine Scotland	Scottish Water
Defence Infrastructure Organisation	Nuclear Safety Directorate (HSE)
Civil Aviation Authority (Airspace)	BAA Aerodrome Safeguarding
British Telecommunications plc	NATS Safeguarding
Brora District Salmon Fishery Board	Highlands and Islands Airport Ltd
Scottish Wildlife Trust	Association of Salmon Fishery Board
John Muir Trust	The Crown Estate
Mountaineering Council of Scotland	Joint Radio Company
Forestry Commission	RSPB Scotland
Visit Scotland	
Community Councils	
Brora Community Council	Golspie Community Council
Helmsdale Community Council	Rogart Community Council

Scoping Opinion

6.2.5 A scoping opinion was subsequently issued by the Scottish Ministers in December 2013, a copy of which is included in Appendix 6.1 of this ES. The responses, contained within the scoping opinion, were considered in detail during the EIA process. Appendix 6.2 of this ES includes a matrix detailing the key issues that were raised in the scoping opinion and how and where they are addressed in the ES. A summary of the key issues included in these responses is detailed in Table 6.2. Scoping responses are also detailed at the start of each specialist chapter, where relevant.

Table 6.2: Scoping Responses

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
Energy Consents & Deployment Unit	The ES should reference relevant policy including NPPF and SPP.	SO pg 5	Planning policy is covered throughout the ES where relevant. See also Chapter 5: Planning Policy. A standalone Planning Statement will accompany the ES.
	The Developer shall engage with NATS, BAA, CAA, MOD etc. on aviation issues at an early stage.	SO pg 6	This has been undertaken and is reported in Chapter 15: Other Issues.
	Relevant economic information connected with the project shall be included in the ES.	SO pg 7	This is discussed in Chapter 14: Socio-economics and Recreation.
	The ES should be submitted in pdf format and issued directly to all consultees. ECDU require 1 hard copy and 2 CDs.	SO pg 8 & 33	This will be undertaken.
	The non-technical summary should be written in simple terms and describe various options for the proposals and mitigation measures.	SO pg 8	A non-technical summary is submitted with the ES (Volume 1).
	The ES should detail site selection and alternatives and examine different parameters to reduce impacts and should also consider access routes.	SO pg 8 & 9	The layout has been designed through an iterative process taking into consideration environmental and technical factors. This process is reported in Chapter 3: Site Selection,

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
			Design Evolution & Consideration of Alternatives and a Design Statement is included in Appendix 3.1.
	Description of the proposed development to include information on the site boundary, design layout and scale of development.	SO pg 9	This is outlined in Chapter 4: Description of the Development.
	A statement of expected carbon savings over the lifetime of the development are encouraged to be included in the ES.	SO pg 11	A carbon balance assessment is included in Chapter 15: Other Issues and Appendix 15.2.
	Measures to ensure that the development does not lead to significant drying or oxidation of peat should be set out in the ES.	SO pg 11	This is reported in Appendix 9.3: Peat Management Plan. See also draft CEMP included in Appendix 4.1.
	Assessment methodology of landscape and visual amenity should follow GLVIA third edition (2013).	SO pg 12	This guidance is followed (see Chapter 7: Landscape and Visual Impact Assessment).
	All visualisations should be accompanied by information on how to view them.	SO pg 12	This is included in all visualisations (see Volume 3A: SNH Methodology and 3B: THC Methodology).
	The ES should contain site specific information on all aspects of site work that might impact on the environment.	SO pg 12 & 13	This is reported in Chapter 4: Description of Development.
	The ES should demonstrate what time of year would be best for construction, taking into account the need to avoid pollution risks and other environmental sensitivities.	SO pg 13	Due to the size of the development it will not be possible to avoid working in winter, however pollution prevention measures will be put in place to mitigate any impact and this is set out in the draft CEMP (Appendix 4.1).
	The impact of the development on public footpaths and RoW should be clearly indicated.	SO pg 13	This is reported in Chapter 14: Socio-economics and Recreation.
	All ecological survey methods should conform to best available standard methods for each habitat and species and surveys should be taken at appropriate times of year.	SO pg 14 & 15	Appropriate guidance and methods have been followed (see Chapter 8: Ecology and Nature Conservation).
	The ES should address the likely impacts on nature conservation interests of all designated sites in the vicinity of the development.	SO pg 14	This is reported in Chapter 8: Ecology and Nature Conservation.
	Habitat enhancement and mitigation measures should be detailed in respect to blanket bog and risk of peat slide.	SO pg 15	This is reported in Chapter 8: Ecology and Nature Conservation and Chapter 9: Hydrology, Hydrogeology and Geology and relevant appendices.
	The ES should demonstrate that turbine locations have been determined on the basis of habitats on site and deep peat and access roads designed to minimise impacts.	SO pg 15	The layout has been designed through an iterative process taking into consideration environmental and technical factors. This process is reported in Chapter 3: Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
			Statement.
	The ES should outline provisions made regarding public access, any restrictions and any new facilities during construction and operation.	SO pg 16	This is reported in Chapter 12: Traffic and Transport.
	A baseline survey of plants, species and birds that are present on the site throughout the year, along with fish in water bodies on the site, should be undertaken.	SO pg 17 & 18	This is reported in Chapter 8: Ecology and Nature Conservation and Chapter 10: Ornithology.
	Survey work should assess bird flight lines and a collision risk analysis should be undertaken.	SO pg 17	This is reported in Chapter 10: Ornithology.
	ES to identify location and mitigation measures in relation to all private water supplies within the catchments of the scheme.	SO pg 20	This is reported within Chapter 9: Hydrology, Hydrogeology and Geology.
	The ES should include assessment on hydrology, water courses, water quality and quantity and flood risk.	SO pg 20	
	The ES should identify all water crossings and include a systematic table accompanied by photography for each watercourse affected.	SO pg 21	This is included in Chapter 9: Hydrology, Hydrogeology and Geology and accompanying appendices and an outline construction method statement is included in the draft CEMP in Appendix 4.1
	Where borrow pits are proposed the ES should include information regarding location, size and nature, depth and reinstatement.	SO pg 23	
	If the development is to take place on peatland habitats, the ES should include a peat slide risk assessment.	SO pg 23	
	Peat slide risks should address pollution risks and environmental sensitivities of the water environment. Peat depth mapping and outline construction method statements should be included in the ES.	SO pg 23	
	The ES should include predicted impacts to the historic environment and describe mitigation to reduce impacts.	SO pg 28	This is reported in Chapter 11: Cultural Heritage.
	The ES should demonstrate all waste streams associated with the works and give consideration to a Site Waste Management Plan.	SO pg 29	This is reported in the draft CEMP (Appendix 4.1).
	Noise predictions should be carried out to evaluate impacts during construction and operation.	SO pg 31	This is reported in Chapter 13: Noise and Vibration.
	Information on the impact of shadow flicker should be included in the ES.	SO pg 31	This is reported in Chapter 15: Other Issues.
	The ES should include information relating to preferred route options for delivering materials.	SO pg 31	This is reported in Chapter 12: Access, Traffic and Transport.
	Where the development may have cumulative impacts with other existing, approved or current wind farm applications, assessment should include consideration of cumulative effects.	SO pg 32	This is dealt with in individual specialist chapters, where relevant.
The Highland Council	The ES should recognise existing land uses affected by the Development and have regard to relevant development plan policies.	SO pg 38	This is reported in Chapter 5: Planning Policy Context and Chapter 14: Socio-economics and Recreation, along with the standalone Planning Statement.
	Socio-economic factors should be considered.	SO pg 39	This is reported in Chapter 14:

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
			Socio-economics & Recreation.
	The ES should take into account mitigation that was agreed as part of the original Gordonbush Wind Farm, and highlight how, if relevant, they can be extended.	SO pg 38	This is covered in each chapter where appropriate.
	A study which outlines the main alternatives studied should be submitted with the application.	SO pg 38	The layout has been designed through an iterative process taking into consideration environmental and technical factors. This process is reported in Chapter 3: Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design Statement.
	The ES should present a clear summary table of all mitigation measures proposed and the table shall be entitled draft Scheme of Mitigation.	SO pg 38	A Schedule of Mitigation is included in Appendix 4.3.
	Viewpoints for the LVIA should be agreed in advance with The Council, and SNH.	SO pg 39	Viewpoints have been agreed with THC and SNH (see Chapter 7: Landscape and Visual Impact Assessment).
	The Council's visualisation and photography standards should be followed.	SO pg 39	Relevant guidance has been followed. A list of deliverables for each viewpoint has been agreed with THC (see Chapter 7: Landscape and Visual Impact Assessment). Visualisations prepared in accordance with THC Methodology are included in Volume 3B.
	Appropriate cumulative impact should be assessed in the final ES.	SO pg 40	List of cumulative sites have been agreed with THC and SNH. Cumulative impact is covered in each chapter where appropriate.
	A Transport Assessment should be carried out, detailing proposed routes and volumes for all construction traffic. An assessment of this against current traffic flows and existing structures is expected.	SO pg 40	This is reported in Chapter 12: Access, Traffic and Transport.
	Nature conservation interests should be assessed in the ES, and mitigation proposed where required.	SO pg 41	This is reported in Chapter 8: Ecology and Nature Conservation.
	Impacts on local geology, hydrology and hydrogeology should be assessed.	SO pg 41	This is reported in Chapter 9: Hydrology, Hydrogeology and Geology.
	Risks of engineering stability on peatland habitats should be assessed, as well as carbon balance.	SO pg 41	This is reported in Chapter 9: Hydrology, Hydrogeology and Geology (and accompanying appendices) and Chapter 15: Other Issues.
	The ES should address the existing air quality and general qualities of the local environment including background noise, sunlight and prevailing wind	SO pg 41	This is reported in Chapter 13: Noise and Vibration and Chapter 15: Other Issues.
	A noise assessment should be included in the ES with regard to the constructional and	SO pg 41 & 42	This is reported in Chapter 13: Noise and Vibration.

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
	operational phases of the development, taking into account the potential cumulative effect of other similar developments.		
	The ES should include details for the suppression of dust arising from construction works and traffic.	SO pg 42	See Appendix 4.1: draft CEMP
	An assessment of cultural heritage should be included in the ES.	SO pg 42	This is reported in Chapter 11: Cultural Heritage.
SEPA	The ES should assess carbon balance.	SO pg 43	This is detailed in Chapter 15: Other Issues and Appendix 15.2.
	The scheme layout should avoid impacts on highly dependent groundwater dependent terrestrial ecosystems and minimise the impacts on those generally considered moderate dependent. The ES should detail what effect the development will have on the flow of these area and any mitigation if required.	SO pg 44	Discussion has taken place with SEPA regarding high and moderate GWDTE areas at this site. This is detailed within Chapter 3: Site Selection, Design Evolution and Consideration of Alternatives and Chapter 9: Hydrology, Hydrogeology and Geology.
	Avoidance of impacts to peatland or mire systems should be demonstrated.	SO pg 45 & 46	The design has aimed to avoid deep peat and this is discussed in Chapter 3: Site Selection, Design Evolution and Consideration of Alternatives.
	A peat depth survey should be carried out and impacts on peatlands considered.	SO pg 45 & 46	A peat survey to full depth has been undertaken and is reported within Chapter 9: Hydrology, Hydrogeology and Geology.
	A draft Habitat Management Plan for the area which could identify areas for wetland improvement post construction should be prepared.	SO pg 44	An update on the Habitat Management work carried out on Gordonbush Estate and the results to date is reported in Chapter 8: Ecology and Nature Conservation.
	The ES should include a map with all the proposed infrastructure overlain on the vegetation maps to show how important habitats have been avoided and where impacts are likely.	SO pg 44	This is noted and is included in Chapter 8: Ecology & Nature Conservation.
	The scoping report suggests that habitat M15b (a sub-community of wet heath habitat type) may not be 'particularly groundwater dependent on site'. The ES should provide further justification for this statement. Information should be provided as to what effect the development could have on this flow.	SO pg 44	Further survey works have taken place, along with discussion with SEPA and it has been confirmed that M15b is not groundwater fed in this setting. This is reported in Chapter 9: Hydrology, Hydrogeology & Geology.
	In areas where avoidance of GWDTE is impossible, details of how impact can be minimised and mitigated should be provided in the ES.	SO pg 44	This is detailed with Chapter 9: Hydrology, Hydrogeology & Geology.
	A Peat management Plan (PMP) should be included in the ES.	So PG 45	A PMP is included in Appendix 9.3.
	Site waste management details should be set out in the ES.	SO pg 46	Appendix 4.1: draft CEMP.
	Potential impacts on ground water should be assessed.	SO pg 47	This is covered in Chapter 9: Hydrology, Hydrogeology & Geology.
	Where water abstraction is proposed, the ES should detail whether a public or private	SO pg 48	

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
	source will be used.		
	Environmental Management during construction is a key consideration and measures to prevent pollution should be included in the ES.	SO pg 48	Appendix 4.1: draft CEMP.
	Engineering activities in the water environment should be avoided where practicable. A water course crossing schedule detailing crossing solutions should be included.	SO pg 48	The site design has been developed to minimise water crossings as detailed in Chapter 3: Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design Statement.
	Information on borrow pit locations, size and nature should be included, and potential impacts assessed.	SO pg 49	This is reported in Chapter 9: Hydrology, Hydrogeology & Geology and Appendix 9.4: Borrow Pit Assessment.
	Flood risk should be assessed.	SO pg 49	This is covered in Chapter 9: Hydrology, Hydrogeology and Geology.
SNH	The design process should consider and seek to reduce potentially significant landscape impacts from Loch Fleet, Loch Brora & Glen Loth SLA, along with minimising visual influence from road users, recreational users and from residential amenity and reduce impact to protected species and habitats.	SO pg 51	The iterative design process has taken into consideration a number of environmental and technical factors and is discussed in Chapter 3: Site Selection, Design Evolution and Consideration of Alternatives.
	A Wild Land assessment should accompany the ES and SNH should be consulted on the methodology used.	SO pg 52	This is included in Chapter 7: Landscape and Visual Impact Assessment.
	Most up to date SNH visualisation guidance should be considered.	SO pg 52	Relevant guidance has been agreed with SNH. See Chapter 7: Landscape and Visual Impact Assessment. Visualisations prepared in accordance with SNH Methodology are included in Volume 3A.
	A robust and up to date cumulative assessment should form part of the EIA process.	SO pg 52	A cumulative list has been agreed with THC & SNH. See Chapter 7: Landscape and Visual Impact Assessment. Cumulative impact will be covered in each chapter where appropriate.
	Alternative design should be considered to minimise visual conflict with the operational scheme and cumulative effects on designated landscapes and on the SAWL.	So PG 53	The layout has been designed through an iterative process taking into consideration environmental and technical factors. This process is reported in Chapter 3: Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design Statement.
	Bird interests of the nearby Caithness and Sutherland Peatland SPA and Coir an Eoin SSSI will require thorough assessment.	SO pg 53	This is covered within Chapter 10: Ornithology.
	Ensure appropriate mitigation measures are put in place pre and during construction and a reptile survey would not be required prior to	SO pg 54	Reptiles had already been surveyed prior to receiving SNH's scoping response.

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
	application submission. A mitigation plan should be provided in the ES.		Mitigation measures are outlined in Chapter 8: Ecology and Nature Conservation.
Historic Scotland	An assessment of cultural heritage should be included in the ES.	SO pg 56	This is reported in Chapter 11: Cultural Heritage.
	Consideration should be given to the cumulative impact of the settings of sites.	SO pg 57	
The Joint Radio Company (JRC)	No potential problems associated with the Development in relation to radio systems operated by utility companies foreseen.	SO pg 67	No action required.
Ministry of Defence	The ES should take account of MOD aviation and radar operations.	SO pg 67	This is reported fully in Chapter 15: Other issues.
Highlands and Islands Airport Limited	Based on the scoping position and heights, the development should not infringe the safeguarding surfaces for either Inverness or Wick John O'Groats airports.	SO pg 76	No action required.
Marine Scotland Science	The ES should give careful consideration to all potential impacts of the Development on fisheries.	SO pg 58	This is covered in Chapter 8: Ecology & Nature Conservation and Appendix 8.3: Fish and Fish Habitat Survey Report.
	Avoidance of water bodies where possible. Appropriate mitigation should be provided where this is not possible.	SO pg 58	The design has aimed to avoid water bodies as described in Chapter 3: Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design Statement.
	Consideration should be given to peat stability.	SO pg 58	This is considered and reported within Chapter 9: Hydrology, Hydrogeology and Geology and Appendix 9.1: Peat Landslide Hazard Risk Assessment.
	Adherence to best available techniques should be provided during development and site specific mitigation measures to protect/compensate freshwater habitats should be included in the ES.	SO pg 60	Best practice techniques will be followed and are reported in Chapter 8: Ecology & Nature Conservation.
	Monitoring throughout the construction phase should be carried out.	SO pg 60	Appendix 4.1: draft CEMP.
RSPB Scotland	RSPB raised concerns that scoping was taking place after bird surveys had been completed, but do not consider a re-survey is necessary.	SO pg 69 & 70	A re-survey has not been undertaken as suggested.
	The ES should include a clear statement on the commitment to mitigation measures.	SO pg 70	Appropriate mitigation is detailed in Chapter 10: Ornithology.
	RSPB Scotland agreed with the approach that the Habitat Management Plan for Gordonbush should be treated as a receptor.	SO pg 70	See Chapter 8: Ecology and Nature Conservation.
	Two conditions were attached to Gordonbush Wind Farm consent; one to facilitate a research project on golden plover and undertake ornithological monitoring to elucidate impacts of wind farms and the effectiveness of mitigation measures. It would be premature to progress an application for an extension until these project conclusions have been published.	SO pg 70 & 71	All ornithological impacts are assessed and presented within Chapter 10: Ornithology.
	The ES should provide adequate justification to explain why the site is suitable, whereas	SO pg 71	This is covered in Chapter 3: Site Selection, Design Evolution and

Consultee	Comments Raised	Scoping Opinion Ref	Action / How it is addressed in the ES
	the Gordonbush Wind Farm was designed to avoid breeding merlin and deeper peat on the extension land.		Consideration of Alternatives and Appendix 3.1: Design Statement.
Scottish Water	No Scottish Water assets affected.	SO pg 71	No action required.
	Locations where public water supplies may be vulnerable should be identified and assessed.	SO pg 72	See Chapter 9: Hydrology, Hydrogeology & Geology.
	Mitigation measures to ensure minimum pollution to water courses should be highlighted in the ES.	SO pg 72	See Chapter 9: Hydrology, Hydrogeology & Geology.
Scottish Wildlife Trust	The impacts of the extension on the Gordonbush Wind Farm Habitat Management Plan should be addressed in the ES.	SO pg 76	See Chapter 8: Ecology and Nature Conservation.
	Avoidance of deep peat and blanket bog should be considered in the design.	SO pg 76	The design has aimed to avoid deep peat. See Chapter Site Selection, Design Evolution & Consideration of Alternatives and Appendix 3.1: Design Statement.
Transport Scotland (JMP)	The ES should identify the expected port of delivery of turbine components and provide an assessment of the route to the site including movement of heavy loads and construction staff movements including vehicle trip generation.	SO pg 62 & 63	This is included within Chapter 12: Access, Traffic and Transport.
	Potential trunk road related environmental impacts such as noise; air quality; and safety etc. should be considered and assessed where appropriate.	SO pg 63 & 64	This is included within Chapter 12: Access, Traffic and Transport and Chapter 13: Noise and Vibration.
Visit Scotland	Tourism considerations should be taken into account as part of the ES. Landscape character and visual amenity are important factors for tourists visiting the area.	SO pg 75	This is included within Chapter 14: Socio-economics and Tourism.

6.3 Pre-Application Consultation

6.3.1 Following the scoping stage, further consultation with relevant statutory and non-statutory consultees has been undertaken to establish detailed assessment methodology, seek views of the evolving wind farm design and to provide an update on the progress of the ES and application submission timescales. This consultation is summarised below.

The Highland Council

6.3.2 A meeting was held between the EIA Co-ordinators (ASH), OPEN (the Project landscape architects) and The Highland Council (Ken McCorquodale) on 8th September 2014 at The Highland Council's headquarters in Inverness. The meeting provided an opportunity to update The Highland Council on the progress of the EIA, key findings of the environmental survey work to date and the design iterations completed to date.

Landscape & Visual

6.3.3 A draft list of suggested viewpoints was issued by email to The Highland Council for comment and advice in early August 2014[1]. The Highland Council confirmed agreement on these locations; queried whether two viewpoints were necessary, and suggested one further viewpoint, which could potentially be impacted by other cumulative developments in the area[2].

6.3.4 Following the meeting, OPEN consulted with The Highland Council on agreement of the list of deliverables for each viewpoint covering The Highland Council visualisation guidance. In addition, a preliminary list of cumulative sites within the 60km study area was also issued for agreement[3]. The Highland Council advised by email which viewpoint should be included on the panoramic viewer and confirmed that the cumulative approach and list of projects were acceptable[4].

Noise

6.3.5 The project noise consultants; Hoare Lea Acoustics wrote to the Council's Environmental Health Department to confirm which residential properties are proposed to be included in the noise monitoring assessment, and to confirm the proposed assessment methodology[5]. Hoare Lea Acoustics spoke to the Council on the day of installing the monitoring equipment (18th August 2014) and the Environmental Health Officer made a subsequent visit to the monitoring locations thereafter.

Scottish Natural Heritage

6.3.6 A draft list of suggested viewpoints (the same as issued to The Highland Council) was sent by email in early August 2014 for SNH's comments[6]. SNH confirmed agreement on these locations, providing suggestions on possible alternative locations, and requested one additional viewpoint to be included within the assessment from Morven, however, OPEN confirmed there would be very limited visibility from this viewpoint[7].

6.3.7 The SNH Renewable Energy Casework Advisor (Nina Turner) attended the meeting with ASH, OPEN and The Highland Council on 8th September 2014. In addition to reviewing the design iteration process; there was a discussion on the assessment of wild land using the revised Wild Land Areas. SNH advised that the assessment should be based on the 2007 guidance, as new guidelines are still being developed.

[1] Email sent by Anna Webster (OPEN) to Ken McCorquodale (THC) on 7th August 2014; 'Proposed Gordonbush Extension'.
[2] Email sent by Ken McCoruodale (THC) to Anna Webster (OPEN) on 11th August 2014; 'RE: Proposed Gordonbush Extension'.
[3] Email sent by Anna Webster (OPEN) to Ken McCorquodale (THC) on 28th October 2014; 'Proposed Gordonbush Wind Farm Extension – viewpoint visualisation requirements and cumulative sites'.
[4] Email sent by Ken McCorquodale (THC) to Anna Webster (OPEN) on 30th October 2014; 'RE: Proposed Gordonbush Wind Farm Extension – viewpoint visualisation requirements and cumulative sites'.
[5] Letter sent by Paul Jindhu (Hoare Lea Acoustics) to Robin Fraser (THC) on 12th August 2014; Ref: LET-1005380-20140812.doc.
[6] Email sent by Anna Webster (OPEN) to Nina Turner (SNH) on 7th August 2014; 'Proposed Gordonbush Extension'.
[7] Email sent by Nina Turner (SNH) to Anna Webster (OPEN) on 2nd September 2014; 'RE: Proposed Gordonbush Extension'.

6.3.8 Following the meeting, OPEN had dialogue with SNH on the list of deliverables for each viewpoint, in line with the SNH visualisation guidance, along with the methodology and a list of projects to include in the cumulative assessment[8]. SNH confirmed the deliverables listed would be acceptable[9].

Scottish Environment Protection Agency (SEPA)

6.3.9 The project hydrologist; SLR Consulting Ltd, sought pre-application advice from SEPA in September 2014 in relation to Groundwater Dependent Terrestrial Ecosystems (GWDTE) at the site. Details of survey findings and investigations completed (which included NVC habitat survey, peat depth probing and hand dug trial pits) were issued to SEPA, along with the draft site layout at that time[10].

6.3.10 SEPA, in their consultation response in early October 2014[11] confirmed, with respect to areas of potentially moderately groundwater dependency, that findings from the site, suggested that much of the M15 habitat (a sub-community of wet heath habitat type and listed as moderately groundwater dependent in SEPA guidance), is in this hydrogeological setting likely to be rainwater fed. As a result, SEPA confirmed that avoidance of disturbance of M15 habitat at Gordonbush is not required, and the buffers quoted in the guidance need not apply. However, they advised that M6c habitat is likely to be groundwater dependent in this setting, and the buffers quoted in their guidance should still apply.

6.3.11 In January 2015, further site investigations were undertaken by SLR Consulting Ltd in the form of water quality sampling, to assess water quality and likely source to areas of potential highly groundwater dependent habitat. It was concluded that the qualitative and quantitative risk assessment demonstrate that the Development is unlikely to have a significant impact on groundwater flow and groundwater quality feeding the identified sensitive receptors. It was proposed that requisite monitoring of the GWDTE habitat identified on the site would be secured by a planning condition and included in the site CEMP to ensure that the water quality and hydraulic connectivity is maintained to the areas of GWDTE[12].

6.3.12 SEPA confirmed at the end of January 2015, by written correspondence[13], that they are content that the information provided makes a suitable case that the final layout is acceptable in terms of impacts on GWDTEs. They were also pleased to note the access tracks avoided the pockets of deep peat on the site, and with few minor adjustments; all deep areas of peat could be avoided. These minor track alterations have been made in agreement with SEPA.

[8] Email sent by Anna Webster (OPEN) to Nina Turner (SNH) on 28th October 2014; 'Proposed Gordonbush Wind Farm Extension – viewpoint visualisation requirements and cumulative sites'.
[9] Email sent by Nina Turner (SNH) to Anna Webster (OPEN) on 3rd November 2014; 'RE: Proposed Gordonbush Wind Farm Extension – viewpoint visualisation requirements and cumulative sites'.
[10] Email sent by Gordon Robb (SLR Consulting) to Susan Haslam (SEPA) on 25th September 2014; 'Gordonbush Proposed Wind Farm Extension – Initial GWDTE Assessment'.
[11] Letter sent by Susan Haslam (SEPA) to Gordon Robb (SLR Consulting) on 6th October 2014; 'RE: Gordonbush Proposed Wind Farm Extension – Initial GWDTE Assessment (Ref: PCS/136085)'.
[12] Email sent by Gordon Robb (SLR Consulting) to Susan Haslam (SEPA) on 22nd January 2015 'RE: SEPA Response to Consultation Reference 113001/4.4/L130925'.
[13] Letter sent by Susan Haslam (SEPA) to Gordon Robb (SLR Consulting) on 27th January 2015, Ref: PCS/138096.

Marine Scotland

6.3.13 Clarification was sought from Marine Scotland following receipt of the scoping opinion in relation to the extent of fish surveys required as part of the EIA process[14]. Marine Scotland confirmed in May 2014 that potential impacts of construction activities on the lower stretches of the Allt a'Mhuillin and Allt Smeorail, downstream of the waterfall would be needed, however, no further fish survey work would be required on the site itself. It was also suggested that a hydrochemical baseline survey would be required, and it was agreed that this would be completed post consent in the pre-construction phase[15].

Ministry of Defence (MoD)

6.3.14 Following receipt of the scoping opinion, further consultation with the MoD was sought to clarify turbine positions and discuss potential mitigation in respect of MoD's interests. It is expected that a suitable lighting condition will be agreed between parties for implementation post consent.

6.4 ECDU Gate Check

6.4.1 Prior to submission of the Section 36 application, a gate check report was submitted to the ECDU, and distributed to statutory consultees, to confirm that comments received during scoping had been addressed within the ES.

6.4.2 Further to the gate check report, a pre-application meeting was held with the ECDU in June 2015.

6.5 Consultation with the Local Community

6.5.1 In parallel with the statutory consultation process, consultation has been undertaken to keep the local community informed about the Development, and seek feedback as the layout and design of the Development has evolved.

Public Exhibition

6.5.2 During October 2013, shortly after the submission of the scoping report, 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 Development. This exhibition took place on the 30th October 2013 at Brora Scout and Guide Hall (12pm to 4pm and 6:30pm to 9pm).

6.5.3 A second public exhibition took place on 20th May 2015 at Brora Scout and Guide Hall (12pm to 4pm and 6pm to 9pm) to provide information to the community on the final design, key environmental sensitivities identified through the EIA process, timescales for submission and information on the application process.

[14] Email from Andrew Curds (ASH) to Dr Emily E. Bridcut (Marine Scotland) on 25th April 2014; 'RE: Gordonbush Wind Farm Extension – Consultation Response from Marine Scotland – dated 10 October 2013'.

[15] Letter from Dr Emily E. Bridcut (Marine Scotland) to Andrew Curds (ASH) on 1st May 2014; Ref: 19/7.

Community Councils

6.5.4 Engagement has been maintained with the local Community Councils in the area including Brora, Golspie, Helmsdale and Rogart and representatives from SSE Renewables Developments (UK) Ltd. attended community council meetings in January and February 2015 with three of these four Community Councils to provide an update on the Development. SSE Renewables Developments (UK) Ltd. met with Rogart Community Council in May 2015.

Community Consultation Report

6.5.5 A Community Consultation Report is included in Appendix 6.3 of this ES. The report provides a detailed explanation of the consultation process undertaken to inform the Development and details the attendance at public exhibition events, providing a summary of the responses received.

Website

6.5.6 A website was set up at www.sse.com/GordonbushExtension (when the proposal was publicly announced around the scoping stage) to provide information on the progress of the Development and key documents or exhibition materials, as well as an opportunity for the local community and members of the public to feedback and communicate directly with the Applicant, in writing, via email or by telephone.