

T: 0300 244 1252
E: magnus.hughson@scotland.gsi.gov.uk

Michael Walker
SSE
1 Waterloo Street
Glasgow
G2 6AY

15 March 2016

Dear Michael

ELECTRICITY ACT 1989 AND THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000

SECTION 36 APPLICATION TO CONSTRUCT AND OPERATE THE PROPOSED GORDONBUSH WIND FARM EXTENSION

I refer to the application, submitted by SSE Generation Limited, to construct and operate the Gordonbush Wind Farm Extension near Brora, Sutherland, in the Highland Council planning authority area.

Highland Council's response raised no objection subject to:

- An amendment of the scheme to remove Turbine 15 from the layout and;
- A reduction in the height of Turbine 11 from 130m to 115m max blade tip height.

You confirmed that are content to proceed to determination with regard the Council's proposed amendments. In order for Ministers to make an informed decision on the application, further information will be required to demonstrate that the impacts (environmental or otherwise) of the altered development are appropriately reflected and that all of the consultees, as well as members of the public, are afforded the chance to fully consider the amended application.

Paragraph 13 –(1) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (as amended 2008) directs that Scottish Ministers may, when dealing with an application for section 36 consent, request in writing further information as may be specified concerning any matter which may be dealt with in the environmental statement.

On behalf of Scottish Ministers I request the following information:

An Environmental Statement Report, evidencing the extent of any change (or recording where there is no change) against each of the chapters that were included in the ES. This will include an updated site layout plan, a refreshed LVIA (to demonstrate that the proposed

amendments achieve the desired effect) and a refreshed carbon payback calculation and Socio Economic chapter to reflect the slightly reduced scheme.

You suggested the following revised visualisations and GIS Figures/ZTVs.

Graphics: visualisations

Gordonbush Revised Layout Viewpoint Review

Viewpoint	Visibility of T11 and T15	Suggested output
1. Beinn Smeorail	T11 and T15 fully visible	Wireline (no specific reason for montage)
2. Loch Brora (south-west side)	T11 not visible T15 theoretically visible as blade tip, but screened by forestry	Wireline (montage would barely change)
3. Brora to Rogart minor road south of Killin	T11 and T15 hubs visible	Wireline and montage
4. Brora to Rogart minor road north of Killin	T11 (not screened) and T15 (screened) hubs visible	Wireline and montage
5. Strath Brora near Balnacoil	T11 hub just visible (screened by forestry) T15 hub visible (not screened)	Wireline and montage
6. Brora to Rogart minor road near Sciberscross	T11 and T15 clearly visible	Wireline and montage
7. Brora to Rogart minor road near Dalreavoch	T11 blade visible T15 fully visible	Wireline and montage
8. Craggie Beg	T11 and T15 clearly visible	Wireline and montage
9. Ben Horn	T11 visible in stack T15 fully visible	Wireline
10. Beinn Dhorain	T11 blade visible T15 hub visible	Wireline
11. Hope Hill	T11 and T15 hubs visible	Wireline
12. Track to Ben Armine Lodge	T11 and T15 fully visible	Wireline
13. Creag nam Fiadh	T11 fully visible T15 hub visible	Wireline
14. Ben Bhraggie	T11 and T15 blades visible	Wireline
15. Ben Armine	T11 and T15 fully visible	Wireline
16. Portmahomack	T11 hub visible T15 fully visible	Wireline
17. Ben Griam Beg	T11 and T15 hubs visible	Wireline

Wirelines

Comparative wirelines of the original layout and revised layout at 53.5-degrees (SNH compliant)

THC wirelines shouldn't be required as they are included for landscape context purposes only, and the principal THC images are the montages.

Photomontages

1. SNH-compliant photomontage of revised layout (53.5-degrees)
2. THC-compliant photomontage of revised layout (50mm)

Comparative montages shouldn't be required – the original figures can be referred to as necessary.

It would not be envisaged that there is a requirement to reproduce the 90-degree photos/cumulative wirelines, or the THC wirelines, 65.5-degree views, and 75mm views.

Graphics: GIS figures

- Revised ZTV/viewpoint figures (Figures 7.8a, b and c; Figures 7.9a and b)
- Revised LCAs with ZTV (Figures 7.10a and b)
- Revised Designations with ZTV (Figure 7.11)
- Revised Wild land with ZTV (Figures 7.12 a and b)
- Revised Visual receptors with ZTV (Figure 7.13)
- Revised Core paths with ZTV (Figure 7.14)

Assessment Text

Review of LVIA text in light of the changed layout. This will focus on a revision of the assessment, and will not update the cumulatives.

Comments from Statutory consultees on the format of the FEI

I invited the statutory consultees to comment on the proposed FEI request. I would be grateful if their comments, as set out below, are taken into consideration.

The Highland Council

Observed that to best assess the visual impact of the development (scale and Distance) you should refer instead to photomontages at 75mm focal length. The 50mm is not necessary except for validation.

SEPA

(1) a re-estimation of peat disturbance, taking the form of a revised Table 6-1 of the Peat Management Plan (Appendix 9.3) or a paragraph explaining how the changes in layout will have affected the figures outlined in the existing Table.

(2) An environmental justification for the layout of tracks to T14, T16 and mast. For example why isn't T16 now being accessed from T13/the borrow pit and why isn't T14 being accessed by a more direct route from the mast? In the absence of T15 it seems likely that further environmental improvements can be made to layout in this area.

SNH

We agree that the suggested information set out as above should be sufficient for us to assess the modifications and provide Ministers with advice on landscape and visual

impacts. Due to the scale of the proposed modification, the location of the modifications within the area assessed in the ES, and the level of impacts predicted in the ES, we do not consider that other revised environmental information on natural heritage interests within our remit is required.

Historic Environment Scotland

Given that the 'Environmental Statement Report' will include the extent of any change against each of the chapters (including cultural heritage) and that the revisions to the scheme are unlikely to increase the impacts for our remit, we are content that further visualisations and detailed assessment for our remit are not required.

This information should be submitted in accordance with paragraph 14 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000. I would be grateful if you could contact me with an estimated date of submission.

Yours sincerely

Magnus Hughson
Energy Consents