# Corriegarth 2 Wind Farm

# Schedule of EIAR & SEI Consultation

# Responses

# PART 4

Consultee	Contact Details and Date of Response	Electronic Page
	PART 1 EIAR	
Cairngorms National Park Authority	ninacaudrey@cairngorms.co.uk 23 <sup>rd</sup> April 2021	3
Crown Estate Scotland	Joan.mcgrogan@crownestatescotland.com 2 <sup>nd</sup> February 2021	20
Defence Infrastructure Organisation	Teena.oulaghan100@mod.gov.uk 22 <sup>nd</sup> February 2021	21
Highland and Islands Airports Limited	safeguarding@hial.co.uk 1st March 2021	27
Historic Environment Scotland	HMConsultations@hes.scot 1st March 2021	28
Ironside Farrar / ECU	21 <sup>st</sup> April 2021	30
Joint Radio Company	windfarms@jrc.co.uk 4 <sup>th</sup> March 2021	52
Mountaineering Scotland	info@mountaineering.scot 15 <sup>th</sup> February 2021	54
NATS Safeguarding	natssafeguarding@nats.co.uk 4 <sup>th</sup> February 2021	60
	PART 2 EIAR	
Nature Scot	Debbie.skinner@nature.scot 25 <sup>th</sup> May 2021	3
Ness & Beauly Fisheries Trust	nessandbeauly@gmail.com 4 <sup>th</sup> March 2021	14
North East Mountain Trust	1 <sup>st</sup> March 2021	15
RSPB	Claire.bsmith@rspb.org.uk 31st May 2021	17
Scottish Forestry	Agata.baranska@forestry.gov.uk 4 <sup>th</sup> March 2021	20
Scottish Water	developmentoperations@scottishwater.co. uk 28 <sup>th</sup> January 2021	23
ScotWays	info@scotways.com 3 <sup>rd</sup> March 2021	27
SEPA	Planning.north@sepa.org.uk 12 <sup>th</sup> August 2021	32
Stratherrick & Foyers Community Council		38
Transport Scotland	Gerard.mcphillips@transport.gov.scot 4 <sup>th</sup> March 2021	40
	PART 3 SEI	
BT	radionetworkprotection@bt.com 11th May 2022	3
Cairngorms National Park Authority	ninacaudrey@cairngorms.co.uk 24 <sup>th</sup> June 2022	4

Crown Estate Scotland	Olivia.morrad@crownestatescotland.com 26 <sup>th</sup> May 2022	13
Defence Infrastructure Organisation	Teena.oulaghan@mod.gov.uk 24 <sup>th</sup> May 2022	14
Fisheries Management Scotland	brian@fms.scot 30 <sup>th</sup> May 2022	18
Glen Urquhart Community Council	11 <sup>th</sup> July 2022	19
HIAL	hialsafeguarding@traxinternational.co.uk 6th June 2022	22
Historic Environment Scotland	Andrew.stevenson2@hes.scot 16 <sup>th</sup> May 2022	26
Ironside Farrar / ECU	October 2022	28
Joint Radio Company	windfarms@jrc.co.uk 5 <sup>th</sup> May 2022	43
NATS Safeguarding	NATSSafeguarding@nats.co.uk 4 <sup>th</sup> May 2022	45
Nature Scot	Debbie.skinner@nature.scot 31st May 2022	46
Ness & Beauly Fisheries Trust	nessandbeauly@gmail.com 3 <sup>rd</sup> May 2022	48
	PART 4 SEI	
Ness District Salmon Fishery Board	ceo@ndsfb.org 30 <sup>th</sup> May 2022	3
RSPB	Claire.bsmith@rspb.org.uk  1st June 2022	4
Scottish Water	developmentoperations@scottishwater.co. uk 28th January 2021	5
SEPA	Planning.north@sepa.org.uk 27 <sup>th</sup> May 2022	9
Transport Scotland	Gerard.mcphillips@transport.gov.scot 31st May 2022	13
	PART 5 SEI	
The Highland Council	Roddy.dowell@highland.gov.uk 24 <sup>th</sup> August 2022	1

# **Mcgroarty K (Kirsty)**

From: Brian Shaw <ceo@ndsfb.org>

Sent:30 May 2022 14:54To:Econsents AdminCc:Brian Davidson

**Subject:** Corriegarth 2 Wind Farm SEI

Dear Energy Consents Unit,

Thank you for consulting the Ness District Salmon Fishery Board regarding the Corriegarth Wind Farm SEI. We note the recommendations of the Corriegarth Wind Farm Extension Fisheries Habitat Survey September 2020, Vol 3 Technical appendix 7.4:-

#### "5.3 Construction and Post-Construction Monitoring of Aquatic Ecology

As part of an ongoing assessment of potential impacts which may occur as a result of the Development, it is recommended that a construction and post-construction fish fauna and aquatic invertebrate monitoring plan is produced (utilising baseline sampling sites plus one control site). The suggested monitoring schedule would include the following:

- Baseline Fish Fauna in areas of Moderate to High Fish Utilisation Potential (FUP) or Fish Habitat Quality (FHQ) watercourses CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11, CG12, CG13, CG14, CG15, CG16, CG17 and CG18. It is also recommended that CG1 is included in the baseline fish fauna survey;
- Fish fauna annually during construction (summer) and post-construction Year 1 (summer) and Year 2 (summer); and
- Aquatic invertebrates annually during construction (spring/autumn) and post[1]construction during Year 1 (spring/autumn) and Year 2 (spring/autumn).

It is also recommended that an Environmental Clerk of Works (ECoW) with knowledge of the water environment should be appointed during major works. The ECoW should undertake water quality monitoring as part of their role."

River E is a significant tributary of the River Foyers and, as concluded by the Fisheries Habitat Survey, it provides a large area of suitable salmonid habitat. The river is inaccessible to anadromous, and potentially catadromous fish (European Eel), but is likely to support a resident trout population. Connectivity in River E is fragmented by waterfalls and hydro weirs. This fragmentation could reduce the resilience of existing fish populations, especially when industrial complexes are constructed within the upper catchment.

Watercourses not supporting Atlantic salmon populations are often understudied during the construction phase of wind farm developments. The Ness District Salmon Fishery Board has zero data on fish populations in River E, it is likely that no organisation has. The proposed wind farm extension provides an opportunity for an assessment of the fish population in a large, "inaccessible", tributary of the Ness.

An appropriately designed fish survey, as per the recommendations of the Fisheries Habitat Survey, would go a long way to providing data from a heavily modified, but inherently productive upland tributary, and may provide positive indicators of how the fate of heavily impacted watercourses can be redressed.

Regards	S
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**Brian Shaw** 

Brian Shaw River Director

Ness District Salmon Fishery Board
Beauly House, Dochfour Business Centre, Inverness, IV3 8GY

Mobile: 07437585334



Debbie Flaherty Energy Consents Unit The Scottish Government

By Email: Econsents admin@gov.scot

1st June 2022

#### Dear Debbie

ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL - Additional Information THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

Thank you for consulting RSPB Scotland on the Additional Information in the form of **Supplementary Environmental Information** (SEI) for the above proposal.

#### Ornithology

We note that the updated layout and removal of two turbines has not significantly changed the predicted effects on red kite and white-tailed eagle and that modelling indicates that the effects on golden eagle population growth is not significant. Therefore, we reiterate our recommendation that the requirements in Annex 2 of our response dated 31<sup>st</sup> May 2021 should be secured by condition.

Condition 5 regarding the Regional Eagle Conservation Management plan is likely to also need to be secured by a legal agreement and a financial and data sharing contribution would need to be agreed to

#### **Peatland**

Re-siting and removal of turbines has reduced the amount of blanket bog that will be lost, and the presentation of impacts is much improved from the original application. We welcome that restoration would now be targeted at high altitude M17. The area proposed for restoration should be maximised as much as possible. In addition to mitigating lost peatland and peatland for which functionality has been detrimentally impacted through construction, additional restoration could deliver positive effects for biodiversity in line with the outcomes of draft NPF4. In our original response we sought an area four times that which is lost, and we note that NatureScot in response to the recent Tom na Clach development recommend that 'bog restoration should be over a large and ambitious area' defined as '10x the area of blanket bog affected'. Therefore, we reiterate the comment made in our response dated 31 May 2021 that an area at least four times the size of the area directly lost should be restored.

Areas A and B in the outline HMP are out with the site boundary, therefore it is likely they will need to be secured by legal agreement to ensure the restoration committed to is delivered.

The HMP should also secure commitments to protect the restoration from further damage e.g., deer management plan/muirburn/drainage.

Yours Sincerely Redacted

Claire Smith
Senior Conservation Officer – South Highland
<a href="mailto:claire.bsmith@rspb.org.uk">claire.bsmith@rspb.org.uk</a>

North Scotland Tel 01463 715000
Office
Etive House
Beechwood Park
Inverness

IV2 3BW

rspb.org.uk

BirdLife
INTERNATIONAL
The RSPB is part of BirdLife International, a partnership of conservation organisations working to give nature a horse around the world.

Thursday, 28th January 2021

Local Planner **Energy Consents Unit** 5 Atlantic Quay Glasgow **G2 8LU** 



**Development Operations** The Bridge Buchanan Gate Business Park Cumbernauld Road Stepps Glasgow G33 6FB

**Development Operations** Freephone Number - 0800 3890379 E-Mail - <u>DevelopmentOperations@scottishwater.co.uk</u> www.scottishwater.co.uk

Dear Sir/Madam

SITE: Corriegarth 2 Wind Farm, , Corriegarth 2 Wind Farm, PH32 4AB

PLANNING REF: ECU00002175 OUR REF: DSCAS-0030974-3S8

PROPOSAL: Wind Farm (Generating station of >50 < 100 MW Capacity )

Please quote our reference in all future correspondence

# Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

# **Drinking Water Protected Areas**

A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness supplies Invermoriston Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778.

It is a relatively large catchment and the activity is sufficient distance from the intake that it is likely to be low risk.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information









can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm.

We welcome that reference has been made to the Scottish Water drinking water catchment.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

# **Surface Water**

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

#### **General notes:**

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
  - Site Investigation Services (UK) Ltd
  - ▶ Tel: 0333 123 1223
  - Email: sw@sisplan.co.uk
  - www.sisplan.co.uk
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department at the above address.
- If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.









- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

# **Next Steps:**

# All Proposed Developments

All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

# Non Domestic/Commercial Property:

Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

# **▶** Trade Effluent Discharge from Non Dom Property:

- Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.
- If you are in any doubt as to whether the discharge from your premises is likely to be trade effluent, please contact us on 0800 778 0778 or email TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found here.
- Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.
- For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas, so the









- development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.
- The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

I trust the above is acceptable however if you require any further information regarding this matter please contact me on 0800 389 0379 or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Pamela Strachan **Development Operations Analyst** developmentoperations@scottishwater.co.uk

#### **Scottish Water Disclaimer:**

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."











Our ref:

5125

Your ref:

ECU00002175

SEPA email contact:

Planning.north@sepa.org.uk

27 May 2022

Debbie Flaherty
Energy Consents Unit
Scottish Government

By email only to: Econsents\_admin@gov.scot

Dear Ms Flaherty

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

The Electricity Act 1989

Corriegarth 2 Wind Farm

Corriegarth Estate, 15 KM north east of Fort Augustus and 10km south east of Foyers in the Highlands

Thank you for consulting SEPA on the above application. We apologise for the delay in this response.

#### Advice for the determining authority

Based on the information available to us, we are now in a position to withdraw our objection to this application provided the following **conditions** are attached to any grant of consent. If any of these issues is not covered by condition, then please still consider our position to be one of objection.

On the basis of the information available and without prejudice to the determination of any corresponding applications for CAR authorisation, we can confirm that we would expect the proposal to fall into Category 1 - 'capable' of being authorised.

#### 1. Impacts on peat and wetlands

1.1 We support the Scottish Government's Net Zero policy commitments, and it is important to ensure the benefits of renewable energy can be realised without a significant cost to the environment. We welcome that the additional environmental information demonstrates that the proposal has minimised impacts on peat "by maximising the use of the existing Corriegarth 1 tracks, removing two turbines and relocating eight turbines". This has resulted in a reduction of excavated peat from 355,284 m³ to 179,770 m³, a reduction of almost 50%.

- 1.2 It is important to note that a windfarm may offset carbon for a 30-year period, but it takes one-thousand years for 1m of peat to form. With a significant amount of deep peat (peat greater than 1m) on the site, this is a substantial carbon store, regardless of the condition of the blanket bog. While "peatland within the Site is now considered to be of low ecological value; and has very limited hydrological, carbon sequestration functionality", we would not consider this a valid reason for a 'carte blanche' approach to peat disturbance. Disturbance of peat in any condition will result in greater impacts, including rate of emissions. It is also important to note that these emissions will not stop once the wind farm has ceased operating, nor does the storing and sequestering potential of peatlands.
- 1.3 We note that the largest contributors to peat excavations are Turbines 6, 8 and 16. Further efforts should be made to microsite these turbines into areas of less deep peat. While efforts have been made to reduce impacts to peat, we again highlight that much of the infrastructure is still on peat greater than 1m deep.

#### 2. Conditions

- 2.1 To minimise negative impacts on peat and carbon loss:
  - All tracks on peat greater than 1m must be floated (as outlined in Section 3.3 of the Outline Peat Management Plan, Appendix 13.2). The feasibility of constructing these tracks should have now been determined, as the removal of our objection is based on the mitigation proposed for the impacts on peat, as presented within the outline Peat Management Plan and the Peat and Borrow Pit Excavation and Re-Use Calculations.
  - Requirement for a finalised Peat Management Plan, which should demonstrate how
    micrositing and other measures such as floating tracks have been used to further minimise
    peat and good quality peat habitat disturbance. Specific attention should be taken to
    micrositing turbines situated on peat depths over 1m (Turbine 6, 8 and 16) to minimise peat
    disturbance.
  - Micrositing of up to 50m (or as you see reasonable), but not onto peat deeper, (or to the
    detriment of other sensitive features such as GWDTE and watercourses), than currently
    shown for the relevant infrastructure on the Final SEI layout with Peat Probe Depths: Figure
    3a
  - Pre-disturbed land, such as track shoulders, should be prioritised for cable trenching, with any excavation of virgin ground only taking place once the electrical contractors have cables on site ready for installation.
- 2.2 To protect and where possible enhance wetland and peatland habitats and to improve carbon sequestration:
  - Adherence to finalised Peat Management Plan which shall ensure reuse of all excavated peat onsite and deliver no less than the area of peat restoration works as outlined in Figure 13.2.7 of the outline Peat Management Plan.
  - A Finalised Habitat Management Plan to the agreement of the planning authority in consultation with SEPA (and NatureScot should they desire). The Plan should be based on the Outline Plan provided (Chapter 7, Section 7.9.1.1) and include the final details of the peat restoration works outlined in the Peat Management Plan. While the volumes of excavated peat for restoration seem more appropriate than the previously cited amount

(141,730m³), we would encourage the applicant to share the details of the peatland restoration proposals as early as possible to ensure agreement on the proposals does not result in any undue delays.

- 2.3 To protect the water environment:
  - All watercourse crossings shall be oversized bottomless arched culverts or traditional style bridges.
- 2.4 To ensure that construction works are carried out in line with the measures prescribed in the submission:
  - Adherence to the measures outlined in the (1) Schedule of Mitigation (Volume 1, Chapter 17); (2) the Outline Borrow Pit Management Plan (Appendix 4.1) (3) the Outline Water Construction Environmental Management Plan (Appendix 12.1).
- 2.5 To ensure that reinstatement and decommission works are carried out in a way that is sensitive to the environment:
  - Borrow pit restoration at the end of the construction phase.
  - Finalised Decommissioning and Restoration Plan with proposals in line with SEPA's Guidance on the life extension and decommissioning of onshore wind farms.

#### Regulatory advice for the applicant

Details of the regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website.

If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team (Argyll Hebrides and South Highland) via email at <a href="mailto:AHSH@sepa.org.uk">AHSH@sepa.org.uk</a>.

If you have queries relating to this letter, please contact me by e-mail at planning.north@sepa.org.uk.

Yours sincerely

Aden McCorkell Senior Planning Officer Planning Service

Ecopy: Debbie.Flaherty@gov.scot; Jillian.Adams@baywa-re.co.uk

#### Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response,

#### **OFFICIAL**

it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our <u>website planning pages</u>.

# Development Management and Strategic Road Safety **Roads Directorate**

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF Direct Line: 0141 272 7379, Fax: 0141 272 7350 gerard.mcphillips@transport.gov.scot



Debbie Flaherty
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref: ECU00002175

Our ref: GB01T19K05

Date: 31/05/2022

Econsents\_Admin@gov.scot

Dear Sirs,

#### **ELECTRICITY ACT 1989**

# THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

# SECTION 36 APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL – SUPPLEMENTARY ENVIRONMENTAL INFORMATION REPORT

With reference to your recent correspondence on the above development, we acknowledge receipt of Environmental Impact Assessment Report (EIAR) Supplementary Environmental Information Report (SEI) prepared by Arcus Consultancy Services in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

#### **Proposed Development**

Transport Scotland was consulted previously on the EIAR for an application for 16 wind turbines with a maximum tip height of 149.9m located adjacent to the operational 23 turbine Corriegarth Wind Farm, approximately 15km north-east of Fort Augustus. We provided comment most recently in our letter dated 4<sup>th</sup> March 2021. In this, we noted that the impact of the additional traffic associated with the construction of the development would not exceed any of the thresholds for further detailed assessment of environmental effects as identified within the IEMA Guidelines. As such, we confirmed that no further trunk road assessment was required.

We also noted that the proposed turbines are considerably larger than those currently in use and while a turbine delivery route has been established, the applicant has thus far not provided any evidence that the larger turbines can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

Transport Scotland was prepared to apply a Condition to the abnormal load route, on the understanding that the granting of Section 36 consent would be no guarantee that technical approval for the abnormal load route will be achieved.

# **Supplementary Environmental Information**

We understand that further to submitting the application for 16 turbines, the applicant has revised the development by reducing the number of turbines from 16 to 14 and relocated eight turbines and ancillary infrastructure, including borrow pit & substation compound.

Chapter 11 of the SEIR presents the updated assessment of the impact of Traffic and Transportation associated with the construction of the proposal. This states that there is no change to the effects detailed in the EIAR and no further assessment is warranted. Given our previous conclusion was that no impact on the trunk road would occur, Transport Scotland is satisfied that a reduction in turbines will not alter this conclusion.

#### **Abnormal Loads Assessment**

With regard to our previous comments on the Abnormal Load Assessment, we note that Table 11.1 of the SEI states the following:

"Prior to the start of construction, an Abnormal Load Route Assessment which demonstrates the suitability of roads within the study area to transport the wind turbine components for the Development will be undertaken and presented to Transport Scotland."

We would, therefore, reiterate our previous comments that the following Conditions and obligations be placed on the applicant to deliver trunk road mitigation, as follows:

Condition 1: Prior to commencement of deliveries to site, the proposed route for any abnormal loads on the trunk road network must be approved by the trunk roads authority prior to the movement of any abnormal load. Any accommodation measures required including the removal of street furniture, junction widening, traffic management must similarly be approved.

#### Reason

To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

Condition 2: During the delivery period of the wind turbine construction materials any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being delivered or removed must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland before delivery commences.

#### Reason

To ensure that the transportation will not have any detrimental effect on the road and structures along the route.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact myself or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

# Yours faithfully

# Gerard McPhillips

# **Gerard McPhillips**

**Transport Scotland Roads Directorate** 

cc Alan DeVenny – SYSTRA Ltd.