



Corriegarth 2 Wind Farm

Environmental Impact Assessment Report

Volume 3 - Technical Appendices

January 2021



CORRIEGARTH 2 WIND FARM

EIA Report – Volume 3 – Technical Appendices

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Carbon Balance Calculations

A15.1







CORRIEGARTH 2 WIND FARM PRELIMINARY BORROW PIT ASSESSMENT

VERSION 1.0

AUGUST 2020



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1 INTRODUCTION

1.1 Preparation of the Borrow Pit Assessment

This Preliminary Borrow Pit Assessment (BPA) for Corriegarth 2 Wind Farm (the Development) has been prepared initially to provide details of potential borrow pit locations or aggregate extraction areas required for the construction of the wind farm.

It is anticipated that all of the turbine bases will be founded on bedrock composed of insitu sedimentary rock types.

The purpose of the BPA is to:

- Assess potential borrow pit locations;
- Estimate available aggregate from the source location;
- Identify overlying superficial soils and define the materials that will be excavated as a result of the Development;
- Identify underlying rock types;
- Set out proposals for adequate intrusive investigations; and
- Detail management techniques for handling, storing and depositing peat for reinstatement.

Scottish Planning Policy (paragraph 243) states that Borrow Pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place'. In the case of this particular development, progressing on-site borrowing provides significant environmental gains as the traffic volume on local roads (B class, C class and unclassified) would be significantly reduced.

1.2 The Development Site

The Development is located south-east of Loch Ness and approximately 15 km north-east of Fort Augustus and the site boundary is approximately 1,694 hectares (ha), as shown on Figure 1. The Site incorporates the boundaries of the Operational Corriegarth Wind Farm in its entirety. The Site is centred on NGR 256250, 814340. The topography of the Site and immediate vicinity is complex and largely consist of rural upland moorland used for grazing and grouse shooting. The Site itself varies significantly in elevation ranging from approximately 550 - 720 m Above Ordnance Datum (AOD) in the central part of the Site, which is within the Operational Corriegarth Wind Farm, before sloping west along the access track towards the B862, with elevations reducing to approximately 200 m AOD. The summit of Carn na Saobhaidhe is located in the west (603 m AOD) of the site while a number of other hills border the Site boundary. The two proposed borrow pit locations are to the west of the turbine locations: Borrow Pit 1 (BP1) is in the vicinity of the historical borrow pit used for the Operational Corriegarth Wind Farm and BP2 is within a steep section of topography adjacent to a proposed new section of wind farm track. Figure 1, 'Proposed Site Layout' is included in Appendix A.

The Development would comprise up to 16 three-bladed horizontal axis turbines up to 149.9 metres (m) tip height and all associated infrastructure, including substation compound, crane hardstandings, underground cabling, external transformer enclosures located adjacent to each turbine, temporary construction compound, up to two borrow pits, and temporary laydown areas. The access track from the B862 leading up the turbine area is existing, having been constructed for the Operational Corriegarth Wind Farm; however, this will require minor localised improvement to facilitate a slightly large turbine, with new access tracks leading to the new turbines.

The details of each borrow pit are included in Section 3.0 of this report. The assessment has been completed through a targeted desk-based review of geological maps, Ordnance



Survey (OS) contour data, aerial photography and from visual observations during site visits between January 2020 and August 2020.

No intrusive site investigation works have been undertaken to date, but it should be noted that the area north of the proposed BP1 was utilised as a borrow pit during construction of the Operational Corriegarth Wind Farm.



2 GEOLOGY

2.1 Superficial Soils

Published BGS mapping of superficial soils indicates the majority of the Site to be dominated by peat, particularly within the regions of the Operational Corriegarth Wind Farm (Figure 2). Localised pockets of glacial till exist in the western and far eastern areas of the Site. Some central parts of the Site lie within an area of unmapped soils; however, given the sites rural upland location, it can be assumed that peat is likely to exist in flatter topographically low-lying areas, thinning on sloped ground.

Figure 2 included in Appendix A illustrates the superficial soils across the site area.

2.2 Bedrock Geology

Published bedrock geology mapping (Figure 3) indicates the Site to be underlain by a variety of bedrock geology. The Gairbeinn Pebbly Psammite Member in the form of Pebbly Psammite dominates the northern sector of the Site while the Monadhliath Semipelite Formation (Semipelite) underlies the southern sector.

The Loch Laggan Psammite Formation, which is predominantly micaceous and feldspathic psammite with thin semipelite beds, covers the central sector of the Site other than a thin band of the Ruthven Semipelite Formation, in the form of Semipelite and Gneissose, which runs across the central western area.

Small pockets of the North Britain Siluro-Devonian Calc-Alkaline Dyke Suite (Felsite) are scattered sporadically across the Site and a small area of the Foyers Igneous Complex (Quartz-Diorite) is present at the north-western extent, near the site entrance.

Figure 3 included in Appendix A illustrates the bedrock geology across the site area.

2.3 Peat

Throughout the peat surveys, a total of 3,380 probes were sunk. Of these, 13.4% recorded no peat or peat less than 0.5 m, while 31.7% recorded peat between 0.5 m and 1.0 m. Deep peat (where the depth was greater than >1.0 m) was recorded at 54.9% of locations.

The maximum peat depth recorded was 5.3 m in the south-eastern area of the Site. Generally, peat depths exceeded 1.0 m, which is generally expected in rural upland locations with undulating topography and localised steep slopes.

Figure 4 included in Appendix A illustrates the 'Interpolated Peat Depths'.

2.4 Hydrogeology

The natural soils onsite are considered to be mainly peat with some localised areas of glacial deposits. The glacial deposit soils generally have a low permeability while peat is fairly permeable but will have high retention properties.

BGS 1:50,000 digital mapping and the BGS GeoIndex shows the bedrock aquifer underlying the Study Area to consist of the Grampion Group and Unnamed Igneous Intrusion, late Silurian to early Devonian. These rocks are classified by the BGS as a 'low productivity aquifer' with small amounts of groundwater in the near-surface weathered zone and secondary fractures.

Details of the hydrogeology are included in **Chapter 12: Hydrology and Hydrogeology** of the EIA Report.



2.5 Mining and Quarrying

The Coal Authority interactive map viewer 1 indicates that the site does not lie within a 'high risk' mining area. Additionally, there are no active mines within the vicinity of the site as indicated by BGS GeoIndex 2 .

Following site walkover and detailed review of aerial photography and the site's topography, there was evidence of localised quarrying taking place. There were also areas identified as being suitable for future quarrying in areas of steep topography, accessible from existing tracks.

¹ http://mapapps2.bgs.ac.uk/coalauthority/home.html

² http://mapapps2.bgs.ac.uk/geoindex/home.html



3 BORROW PIT ASSESSMENT

3.1 General

This section of the BPA identifies potential borrow pit locations within the Development site boundary that could be utilised in provision of aggregate for construction. This will be used in the construction of site access tracks, crane hardstanding areas, upgrades of existing forestry tracks and potentially concrete batching.

The proposed borrow pit locations have been selected based on their:

- Topography;
- Previous uses;
- · Accessibility from existing or proposed access tracks;
- Orientation with respect to visibility;
- Potential aggregate volume; and
- Proximity of rock to the surface.

Steeper topography is preferable for quarrying, where soils coverage will be limited. Careful consideration was given to landscape and visualisation impacts, as well as other considerations included proximity to watercourses, places of archaeological interest, and forestry. The borrow pit locations are in areas where the peat cover is thin or vacant and where bedrock outcrops and aggregate reserves are expected to occur near the surface.

No intrusive site investigation works have been undertaken into the quality of rock that might be recovered at the time of preparing this BPA. However, it is anticipated that a full ground investigation will take place in advance of construction of the Development. The investigation will include the testing of material from within the proposed borrow pit areas to assess its suitability for reuse.

It should be noted that the location of BP1 lies immediately adjacent to an area utilised for borrowing during the construction of the Operational Corriegarth Wind Farm; therefore, it is anticipated that any materials won from the quarrying will be suitable for construction use.

3.2 Borrow Pit Locations and Considerations

Two borrow pit search areas were initially identified from a combination of desk-based assessment of mapping and topography and site walkover survey. Other environmental constraints were also considered, including watercourse buffers and peat. A summary of both identified search areas is presented as follows.

3.2.1.1 Borrow Pit Location 1

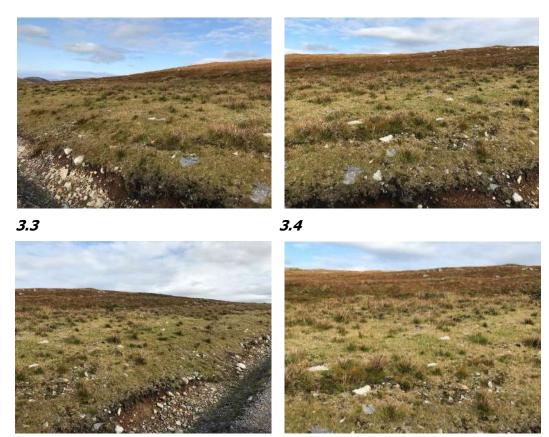
Borrow Pit 1 is located at approximate centre point NGR 255424, 813738. The site was selected due to it being adjacent to existing site tracks and situated on topographically steep area and in proximity to an area utilised for borrowing during construction of the Operational Corriegarth Wind Farm.

BGS superficial soils information indicates that this area is not mapped; however, aerial photography and site walkover evidence suggests rockhead is near surface with localised outcrops.

The solid geology mapping indicates the underlying bedrock to be entirely within a mapped area of pebbly Psammite. The location does not encroach on any environmental development constraints.



Figures 3.1 - 3.4 - Existing conditions at Borrow Pit Search Area 1 3.1 3.2



3.2.1.2 Borrow Pit Location 2

Borrow Pit 2 is located to the north of Turbine 1, approximately centred at NGR 255513, 812934. The site was selected due its proximity to a proposed track leading north of T1 and within close proximity of the main southern track. It is also in a topographically steep area and not visible from the west as well as having generally shallow peat.

BGS superficial soils information indicates that this area is not mapped; however, with steep topography and shallow peat, it is anticipated that rockhead would be near surface with localised outcrops. The solid geology mapping indicates the underlying bedrock to be within a localised area of Semipelite with the surrounding area to the north and south mainly Psammites. The location does not encroach on any environmental development constraints.



Figures 3.5 – 3.6 - Existing conditions at Borrow Pit Search Area 2 3.5 3.6







3.3 Findings and Recommendations

The ground modelling of BP1 and BP2 informs the assessment summary as set out in section 3.4. It should be noted that further investigations would be required to fully understand the feasibility of these options which would comprise rotary percussive drilling and rock sampling through coring and suitable geotechnical testing.

From here on in, borrow pit search areas 5 and 3 will be named Borrow Pit 1 (BP1) and Borrow Pit 2 (BP2) respectively, in line with the referencing in the Environmental Impact Assessment (EIA) Report.

3.4 Design

Based on the identified search areas, a three-dimensional outline design was undertaken to establish the target capacity required from the proposed borrow pits. This involved a civil design taking account of the overall proposed site layout levels and both existing and proposed access tracks in order to develop a viable borrow area. The outline design of each borrow working included a main worked area with earthwork batters and indicative drainage cut-off ditches, and therefore was finalised as a total area situated within the initial search areas. The details of the outline borrow working design is summarised in Table 3.1 below while Borrow Pit Plans and Profiles are shown in Figure 5 and 6 in Appendix A.

Table 3.1: Borrow Working - Assessment Summary

| Tubic 5.1. Dollow Working Assessment Summary | | | | | | |
|--|-------------------------|-----------------------------------|--|--|--|--|
| Borrow Pit No. | Surface Area (m²) | 3D Model Total Cut Volume (m³) | Interpolated Peat Depth (m) | Estimated Peat and Other Soils Volume (m³) | Estimated Aggregate Available (m³) | |
| 1 | 25,460 | 196,900 | Peat < 0.5m Other Soils 0.5 – 1.0m | 25,460 | 171,440 | |
| 2 | 16,480 | 123,371 | Peat < 0.5m Other Soils 0.5 – 1.0m | 16,480 | 106,891 | |
| TOTAL | 41,940 | 320,271 | - | 41,940 | 278,331 | |

For the purposes of this outline borrow pit assessment, the volumes indicated in the table above are based on the following parameter:

- Borrow Pit 1 area of approximately 200 m x 125 m;
- Borrow Pit 2 area of approximately 180 m x 110 m;
- Borrow Pit floor levels taken from the levels associated with the existing access track; and
- Cut profile at 63° from borrow pit floor to intersection point of existing terrain.



4 METHODS OF WORKING

The requirement to produce various grades of aggregate will necessitate the use of mobile quarrying plant and equipment. This operation will comprise a number of different elements which are summarised in the following Sections.

It is possible that the quarried material will require blasting methods should testing prove relatively high strengths and competencies. Where this is required, it is proposed that a lightweight crawler mounted blast hole drill rig is employed together with an attendant compressor. Explosives will need to be considered in detail by the Contractor at construction stage relating to safe operation, transportation and storage. The Contractor may also wish to consider alternative methods suitable to the quality of the rock. All aggregate materials won in borrow pits will be subject to crushing and screening. The primary component of this operation will consist of a mobile crushing and screening system.

The Contractor will provide a plant setup that meets the Development requirements processing the rock to produce the quantities, quality and sizes of the material required. The construction of the Development access tracks will be undertaken utilising the majority of the aggregate produced from the borrow pit operations. It is intended that the access tracks will be constructed on the basis of normal best practice for the accommodation of wind turbine components.

The Contractor should undertake testing of the materials as the borrow pits are worked to ensure material quality is maintained, with particular reference to the ability of the materials to resist freezing/thawing and wetting/drying, and therefore serve the lifespan of the Development.

The appointed Contractor will provide a detailed risk assessment and method statement to cover the working methods employed within the borrow pits for approval during the construction phase.

4.1 Overburden Handling

Prior to progressing works at borrow pits, the areas will require to be stripped of superficial material overlying the bedrock. Material storage areas should be identified and the superficial soils carefully placed in segregated stockpiles within the appropriate storage area.

Access routes to the borrow pits will form part of the enabling works prior to the mobilisation of quarry plant. The main items of mobile quarry plant will be tracked, typically low ground pressure capable of traversing surfaces which have had only limited surface preparation.

4.2 Drainage of Borrow Pits

Temporary interception/peripheral bunds and cut-off drainage ditches ('clean water drains') should be constructed upslope of the borrow pits and cuts to prevent surface water runoff entering the excavation. Swales to collect runoff should be placed on the downslope of borrow pits and overburden / stockpiles will be designed to treat potentially silty runoff before discharging back into the drainage system.

A drainage and surface water management system will be required in order to control surface water run-off from borrow pit areas. Due to the nature and size of the proposed excavations, the drainage system should consist of a peripheral cut-off ditch together with attenuation features and soakaways. Drainage ditches should be installed using a tracked excavator and, where necessary, a hydraulic breaker.

Waste water discharge onto vegetated surfaces from borrow pits and earthworks areas should be directed away from watercourses and drainage ditches to avoid direct discharge.



Any sediment suspended within the treated water should be deposited amongst the rough surface vegetation.

Drainage measures to be implemented for borrow pits is included in the wCEMP, Technical Appendix 12.1 of the EIA Report.

4.3 Reinstatement Proposals

It is envisaged that overburden/soils will be carefully stored adjacent to the extraction areas for re-use.

Each borrow pit should be suitably re-instated with topsoil and any available peat, peaty soils and turves to re-establish hydrological and ecological conditions and reduce any potential visual impacts. There is a potential for till or sands and gravels to be available for reinstatement purposes.

The reinstated peat/soil surface would be profiled to allow drainage and the re-introduction of appropriate vegetation cover would tie into existing topography. The upper part of the quarry face would remain exposed and would be allowed to become weathered. It is envisaged that this face would acquire an appearance similar to that of other natural rock exposures in the locality.

The reinstated profile will be of varying thicknesses above the base of the borrow pit and will be gently sloping from the track edge to the quarry face, generally with thicknesses representative to that of the peat and soils initially stripped from borrow pits areas.

The conjectured reinstatement profiles are shown in Figures 5 and 6in Appendix A.

It should be noted that the permanent substations for Corriegarth 2 Wind Farm will be located within the eastern area of Borrow Pit 1; therefore, the reinstatement strategies should take account of the presence of the substation compound.

4.4 Borrow Pit Working Programme

Of the possible borrow pits recommended, Borrow Working 1 is located off the existing track networks and is required to be worked prior to the construction of the substation. It is likely that BP1 would provide enough aggregate to meet the demands the construction will have. Additionally, BP1 is located closest to the site entrance and will be worked earliest in the construction programme. BP 2 can provide a contingency option should additional aggregate be required beyond the estimation of this preliminary assessment.



5 CONCLUSION

The siting of the borrow pits within the Development has been made on the basis of proximity to the existing and proposed access tracks, consideration of topography, geology and identified constraints. Based on the desk-based assessment, it is anticipated that there are adequate locations on site to position proposed borrow pits which would achieve the required aggregate quantities for the development.

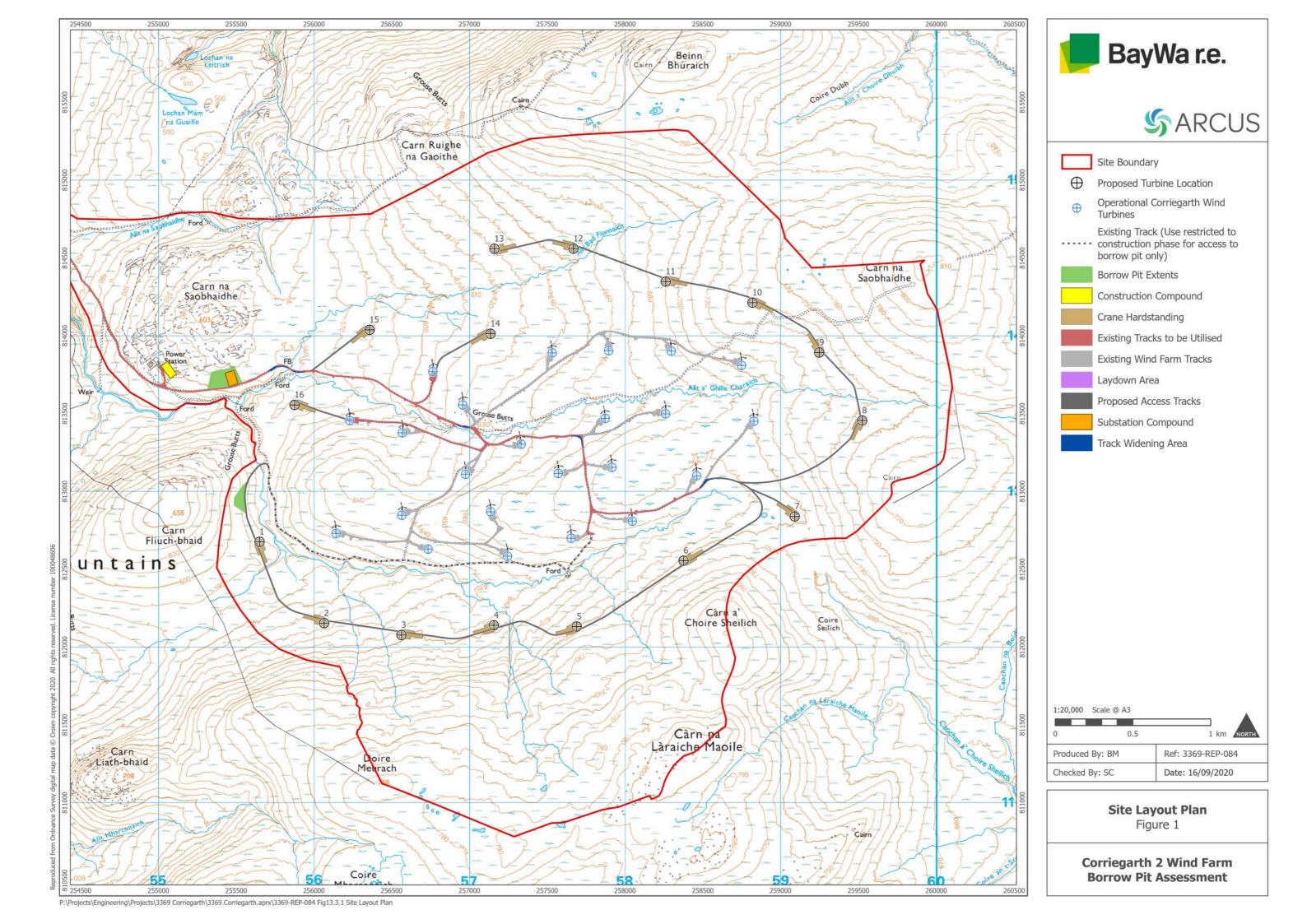
Considerations for the assessment of borrow pits following consent of the Development include:

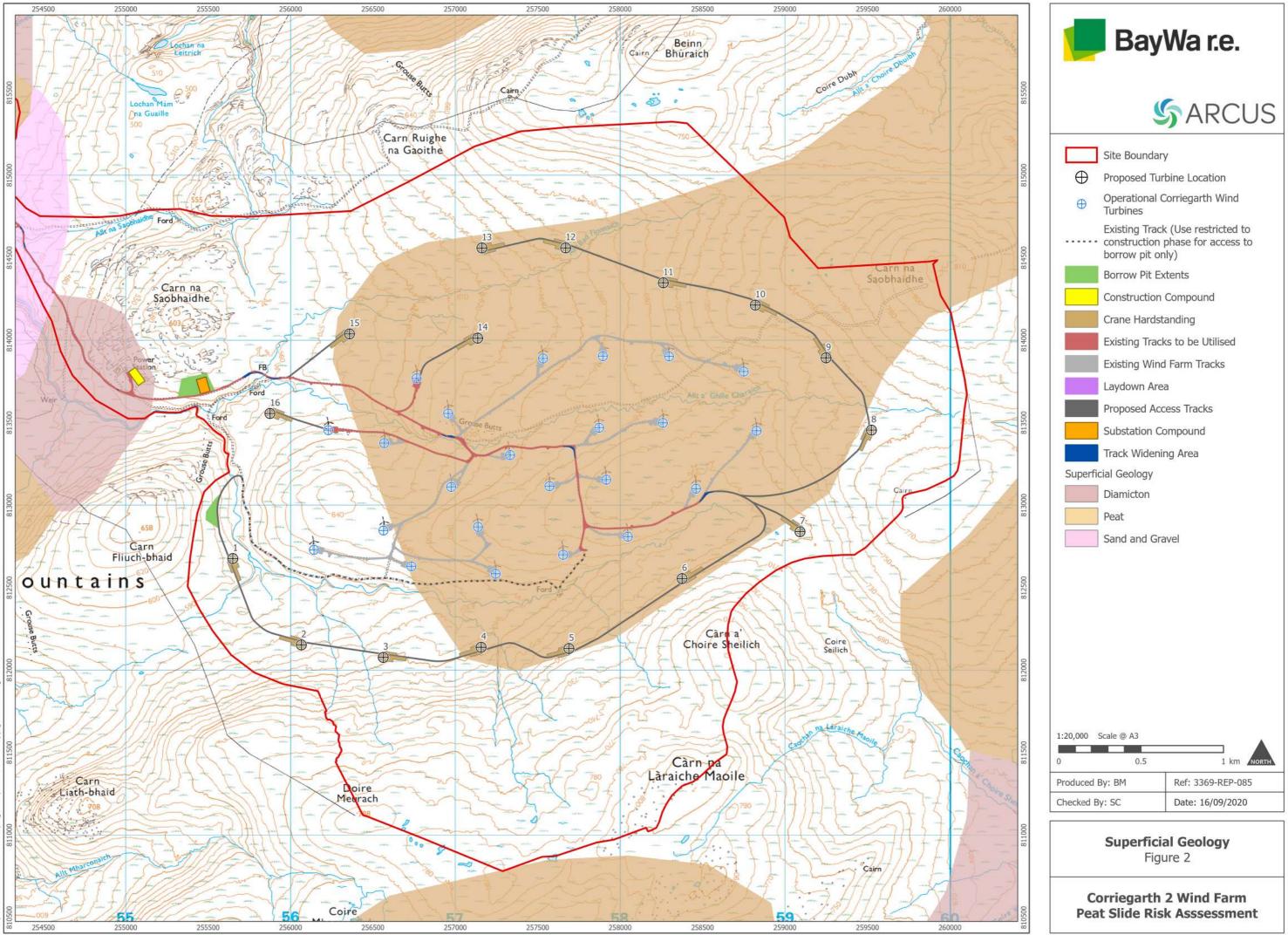
- Ground investigations and relevant geo-environmental analysis undertaken prior to finalising borrow pit proposals;
- Three-dimensional design should be undertaken following detailed design and ground investigations to confirm the capacity of the proposed borrow pits; and
- Detailed profiles of borrow pit excavations including existing ground levels, proposed excavation levels and a conceptual restoration profile for each borrow pit should be produced once final borrow pit extents have been agreed.

Prior to the construction of the windfarm, design and best practices and any required mitigation measures would be set out in full within a Construction Environmental Management Plan and agreed with the statutory bodies.

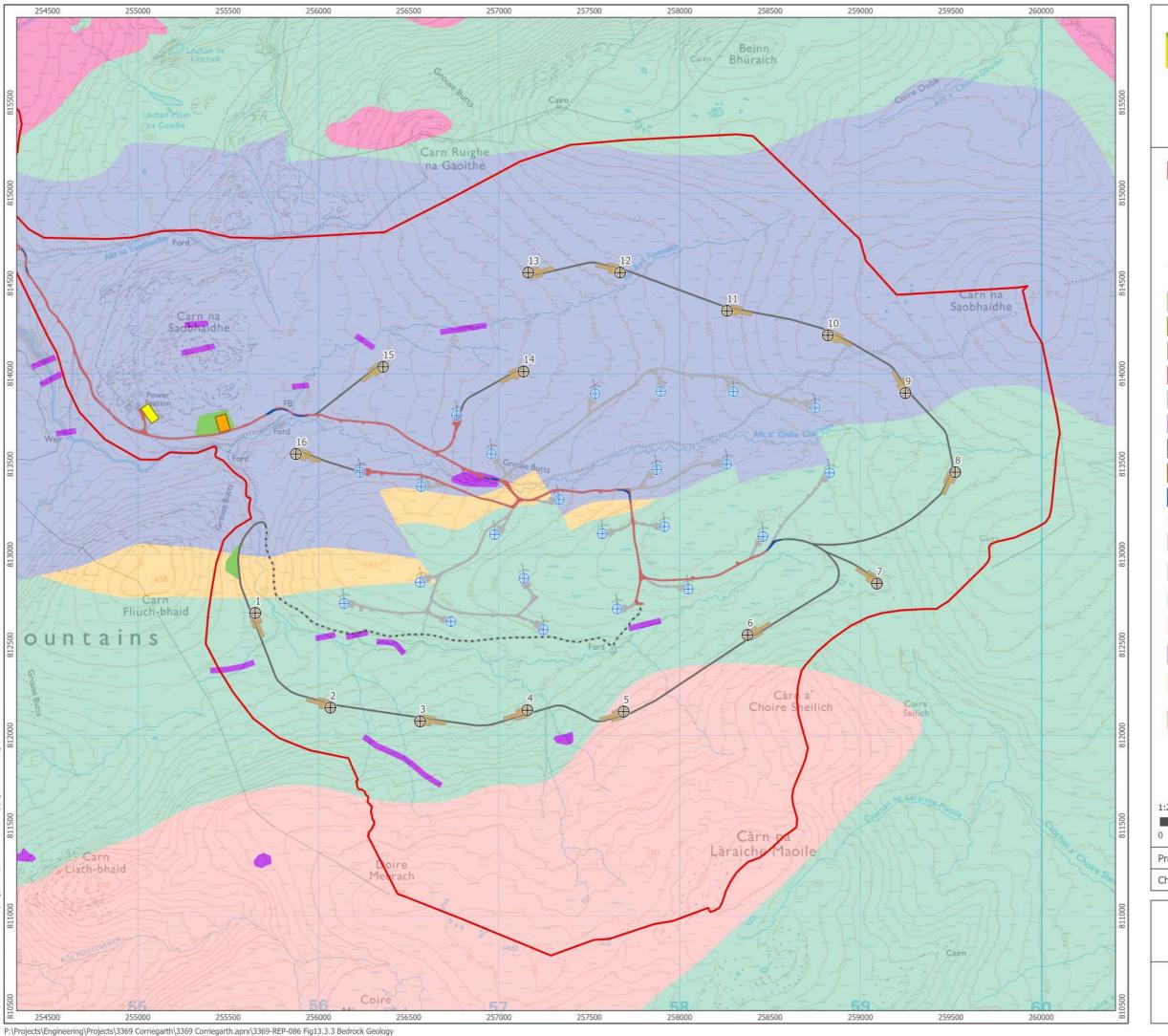


APPENDIX A – FIGURES





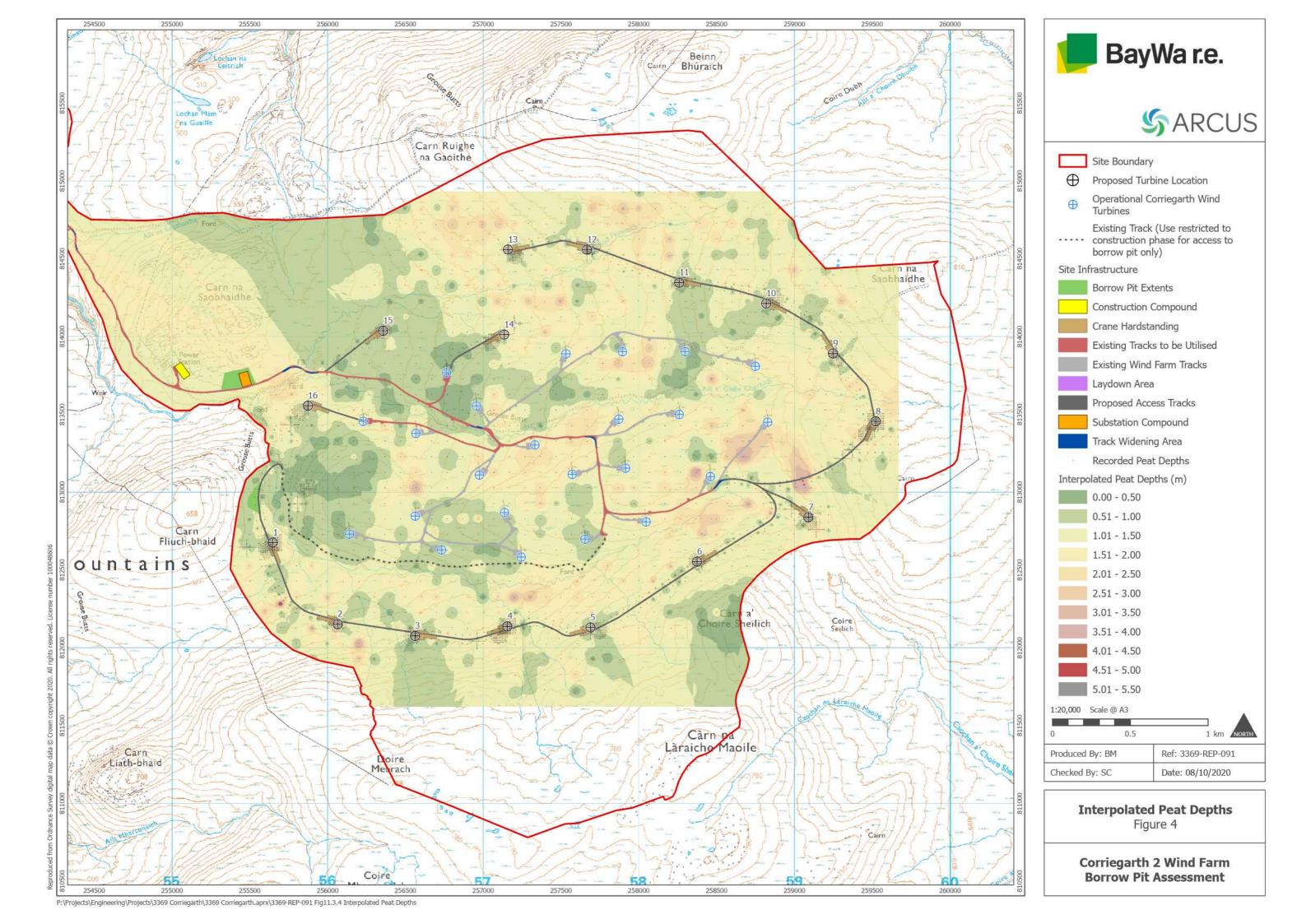
P:\Projects\Engineering\Projects\3369 Corriegarth\3369 Corriegarth.aprx\3369-REP-085 Fig13.3.2 Superficial Geology

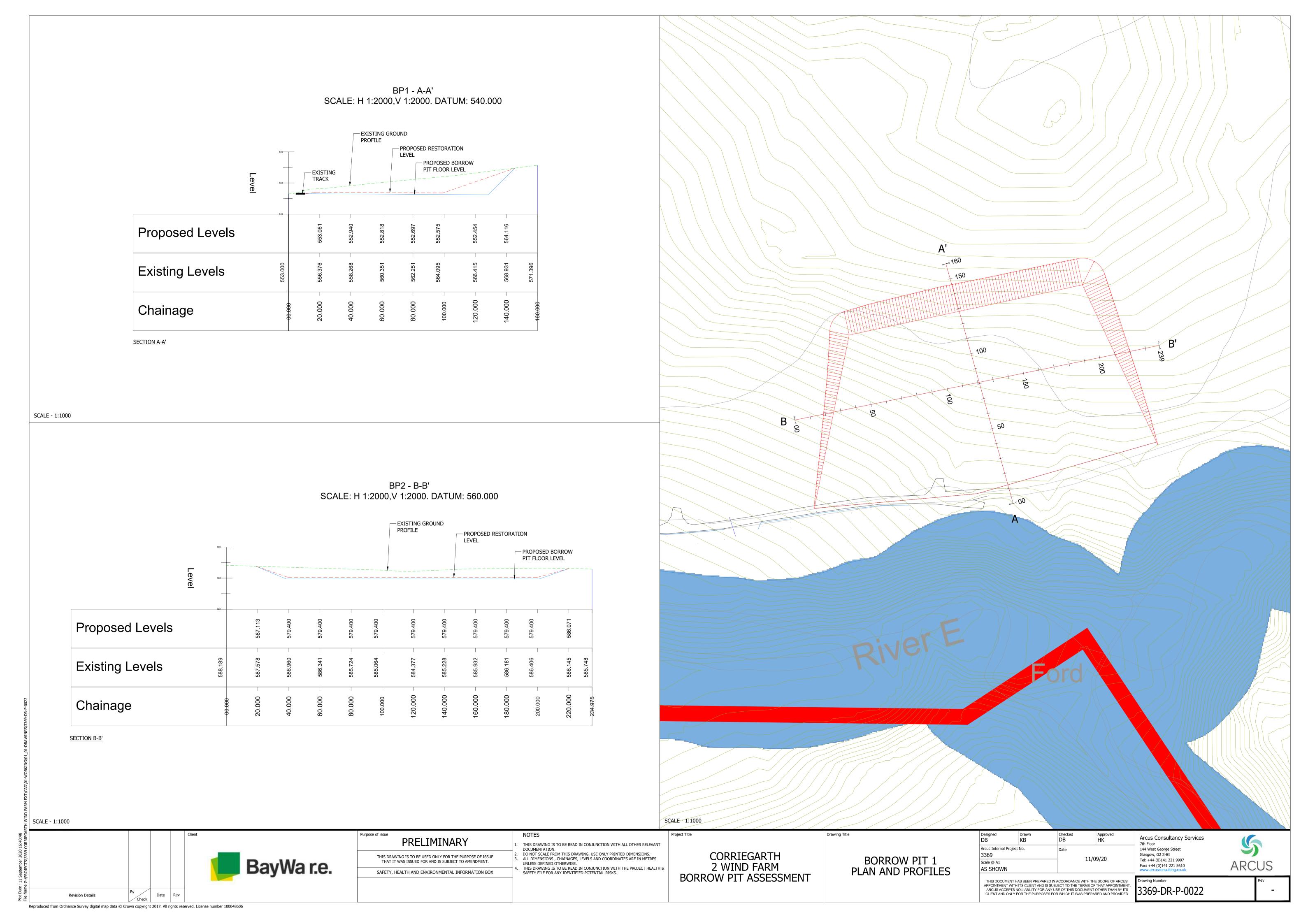


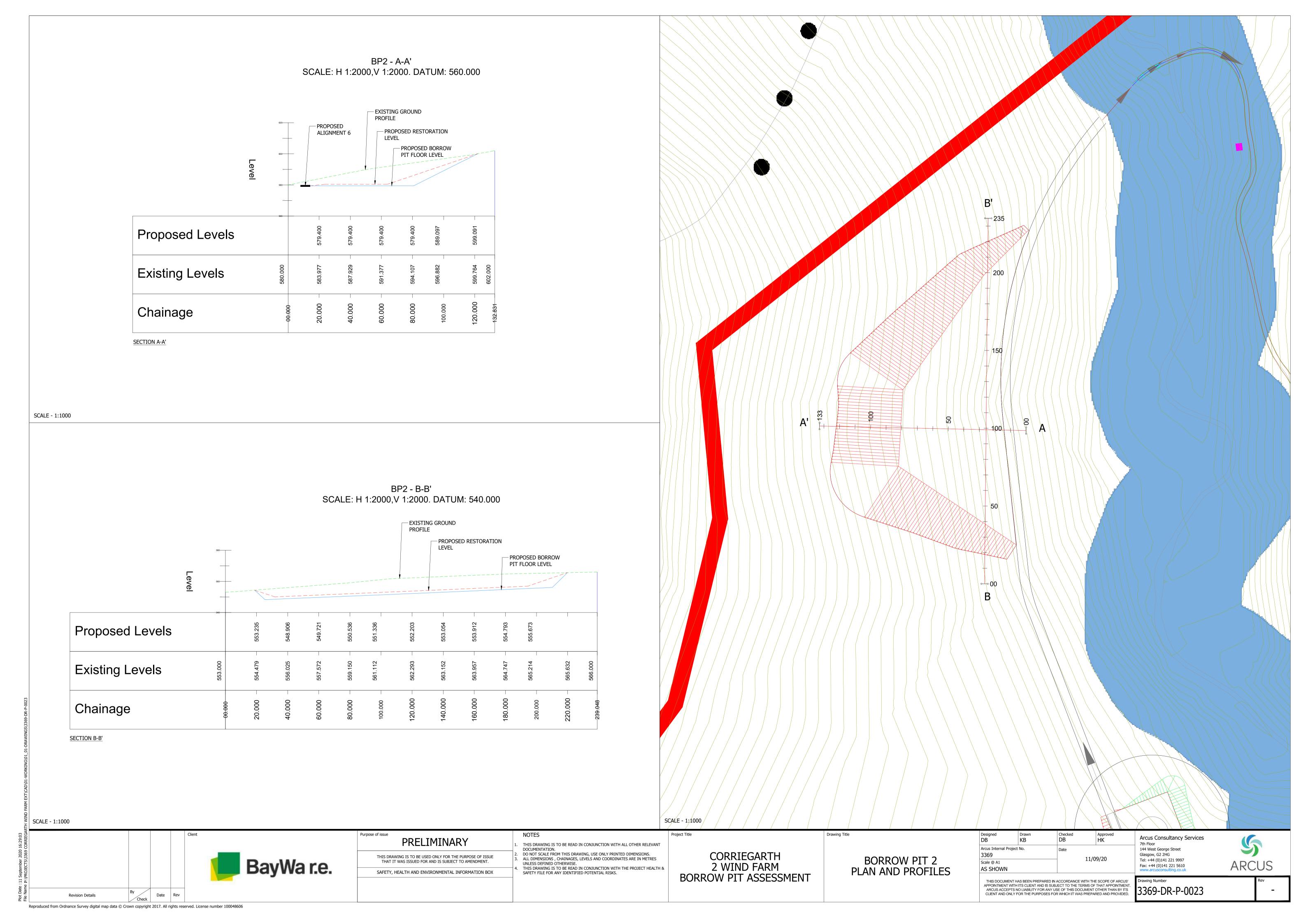


Bedrock Geology Figure 3

Corriegarth 2 Wind Farm **Peat Slide Risk Assessment**









CORRIEGARTH 2 WIND FARM

TECHNICAL APPENDIX 4.2

OUTLINE DECOMMISSIONING AND RESTORATION PLAN

SEPTEMBER 2020



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1 INTRODUCTION

1.1 Planning Context

Arcus Consultancy Services Ltd (Arcus), on behalf of Corriegarth Wind Farm Ltd (the Applicant), has prepared an outline Decommissioning and Restoration Plan (DRP) for Corriegarth 2 Wind Farm (the Development) located south-east of Loch Ness and approximately 15 km north-east of Fort Augustus (the Site).

This DRP has been prepared to provide an outline of the expected methodology for the removal of the wind turbine generators and ancillary infrastructure associated with the Development. This DRP is based upon current 2020 technologies, methods and best practice. During the operation life of the Development, technology will develop and methods will evolve as experience of decommissioning similar developments increases. This DRP will be updated with the latest methods and best practice, in agreement with statutory consultees, no later than 3 years prior to decommissioning of the Development.

The principle aim of the decommissioning and restoration works will be to minimise further environmental impact associated with the Development and, consequently, will result in some instances of infrastructure remaining *in situ*, as is current best practice.

1.2 Site Information

The Development is centred at approximately National Grid reference (NGR) 257500, 813100 on the Corriegarth Estate, located south-east of Loch Ness and approximately 15 km north-east of Fort Augustus in the Scottish Highlands.

The Site extends to an area of approximately 1,694 hectares (ha) with elevations within the Site between 550 - 810 m Above Ordnance Datum (AOD). The Site is currently managed as a grouse shooting estate with some pastoral grazing. The Site is surrounded by a series of prominent hills: Carn na Saobhaidhe is a summit (603 m AOD) located in the north west of the Site and there are several other summits which are located along the Site Boundary, including:

- Doire Meurach (788 m AOD);
- Càrn na Làraiche Maoile (800 m AOD);
- Càrn a Choire Sheilich (790 m AOD); and
- Carn na Saobhaidhe (810 m AOD).

The Site lies within the catchments of the River E, which flows east to west across the Site and rises in the south-east of the Site before discharging into Loch Mhor (also known as Loch Garth). The Allt Bad Fionnaich and Allt a' Ghille Charaic tributaries of the River E rise approximately 800 m and 900 m east of the Site boundary respectively and join River the E at the south-west boundary of the Site.

Access to the Site is afforded from an unclassified road and access tracks running from the B862 to the west of the Site, passing Corriegarth Lodge and broadly following the alignment of the River E on a north-west to south-east alignment.

The nearest settlements are Whitebridge, located approximately 5 km west of the Site, with more dispersed settlement along Stratherrick, located approximately 5 km north and west of the Development. The closest residential property is located at Garthbeg Bungalow, situated approximately 3.5 km south-west of the closest indicative turbine location. There are also a number of residential properties, such as Corriegarth Lodge, located along the B862 to the west of the Site; however, these properties are just outwith the Site boundary.



2 DEVELOPMENT INFRASTRUCTURE

2.1 Description of Development

A description of each element of infrastructure and the decommissioning methods/restoration plan are set out in this Section. The following components are to be decommissioned at the end of the operational life of the Development:

- 16 three-bladed wind turbine generators (WTGs) with maximum height to blade tip of 149.9 metres (m);
- Crane hard standing areas at each WTG base measuring 40 m x 35 m;
- On-site substation compound measuring 60 m x 90 m including SHET substation measuring 30 x 20 m and control building measuring 25 x 15 m;
- Formation of 10 km of new access tracks with a width of between 5-6 m with associated watercourse crossings and the localised upgrades to 13 km of the existing 25 km of tracks;
- On-site underground power cabling with trenches approximately 1 m deep and 1 m wide following site tracks where possible;
- Temporary construction compound measuring 100 m x 50 m;
- Up to two temporary laydown areas; and
- Up to two temporary borrow pits.

2.2 Site Environmental Sensitivities

All legislation and best practice guidance relating to protected species (flora and fauna) onsite at the time of decommissioning shall be adhered to. While the risk of disturbing protected species is expected to be low, appropriate protected species surveys should be undertaken prior to decommissioning works.

Consideration should also be given to the timing of the works with particular attention given to the bird breeding season. An Ecological Clerk of Works (ECoW) may be required, the need for which would be agreed prior to decommissioning, to provide advice on the implementation of any necessary exclusion zones.

2.3 Restoration Plan

2.3.1 General Principles

Ground works associated with the decommissioning will be undertaken by the Principal Decommissioning Contractor and shall be in accordance with all documentation and preworks surveys prescribed by the appointed environmental consultants and as agreed with Highland Council (the Council) and appropriate consultees.

The decommissioning of the Development is not expected to pose significant risks to the environment, nevertheless risks need to be addressed in order to ensure that no, or minimal, impact on the environment occurs. It is expected that the environmental protection and mitigation measures, to be specified within the Construction Environmental Management Plan (CEMP) prepared prior to construction, will also apply to decommissioning.

Decommissioning will be undertaken at the end of the operational life of the Development, unless otherwise stated. As technology develops and experience of wind farm decommissioning grows, best practice will evolve. The DRP will be updated with the latest methods and best practice, in agreement with statutory consultees, at least 3 years prior to decommissioning.

The reinstatement of any areas disturbed during the decommissioning works will be undertaken by the Principal Decommissioning Contractor. It is expected that reinstatement



requirements would be specified within the final DRP and CEMP prepared as part of the civil works contract for the decommissioning works.

2.3.2 Turbines

On decommissioning, the wind turbine structures will be dismantled and removed from the Site. With regard to decommissioning of the turbine components, these shall be undertaken in line with current best practice and waste hierarchy. Turbine components will be re-used or recycled off-site where possible.

Landfilling of turbine components or other materials generated during the decommissioning will be a last resort and will be undertaken in accordance with the current Waste Regulations by the appointed Principal Decommissioning Contractor.

2.3.3 Turbine Foundations

Concrete broken out from existing turbine foundations and hardstanding areas will be reused on-site. Where this is not possible, materials will be assessed for potential reuse offsite or recycling.

Concrete turbine foundations will be excavated to a depth of approximately 0.5 m below ground level (bgl) and the area restored by application of the original overburden which has been stored locally.

Should the import of soils or stone be required for reinstatement, then such materials will be accompanied by either a Declaration of Analysis, written confirmation that material was produced under a quality control procedure in accordance with the WRAP Quality Protocol, or other applicable procedure in place at the time of the decommissioning works.

Seeding may be required if suitable vegetation turfs are not available. Seed mixes will be selected to be compatible with existing habitats at the time of decommissioning and likely agreed with the ECoW.

2.3.4 Crane Hardstandings

Sixteen crane hardstandings are required, each extending to approximately 40 m x 35 m and consequently, a total area of approximately 2.2 ha.

The imported granular material will remain in situ and these areas will be restored by utilising the original overburden which was removed and stored locally.

2.3.5 Substation Compound

The substation compound 60 m x 90 m extends approximately 0.54 ha.

At the point of decommissioning, all buildings and electrical equipment will be removed, together with any concrete foundations to a depth of approximately 0.5 m, with the substation site being restored using the original overburden which has been stored locally.

Where possible, the exterior and interior components of demolished buildings shall be taken off-site for reuse or recycling.

2.3.6 Access Tracks

To ensure that environmental disturbance is kept to a minimum, access tracks, including watercourse crossings, will be left in situ following decommissioning of the Development.

2.3.7 Cables

To ensure that environmental disturbance is kept to a minimum, below ground cabling is expected to be left in situ. This will be reviewed as decommissioning good practice evolves.



2.3.8 Construction Compound

A construction compound (100 m x 50 m) will be created, on, and adjacent to, an already existing area of hardstanding. The construction compound extends to approximately to 0.5 ha and may be reseeded following construction but available for use throughout the operation should repairs be required that need a construction compound.

As such, the construction compound will be fully restored at the point of decommissioning. The granular material making up the compound surface will be left in situ, and these areas will be restored by utilising the original overburden that was removed from these areas which will be stored in an adjacent bund. Any shortfall of material may be accommodated by overburden originally derived from the track areas, which will be stored locally.

2.3.9 Borrow Pits

The Development includes up to two borrow pits. Material won from these borrow pits will be processed on-site and used to form the access tracks, hardstandings and sub-base foundations to other infrastructure. As part of the initial development phase, the borrow pits will be graded post excavation.

Following retrieval of any stored material, borrow pits will be left to naturalise. The CEMP will include details on restoration and re-profiling.



3 ENVIRONMENTAL MANAGEMENT PROVISIONS

3.1 Waste Management

The decommissioning of the Development will be undertaken in line with the proposed methods as detailed above in accordance with current best practice and waste hierarchy.

Where possible, concrete broken out from existing hardstanding areas will be re-used onsite to infill excavations following infrastructure removal (*e.g.* transformer bases). Where this is not possible, materials will be assessed for potential reuse off-site or recycling.

Turbine components will either be re-used (sold on) or recycled off-site.

Landfilling of turbine components, concrete, stone or other materials generated during the decommissioning will be a last resort and will be undertaken in accordance with current Waste Regulations by the appointed Principal Contractor.

The Principal Contractor will be required to develop and update a Site Waste Management Plan (SWMP) for the duration of the decommissioning works. The SWMP will detail waste types and disposal routes / final destinations in accordance with current regulations and guidance.

3.2 Ground Disturbance, Material Excavation and Reinstatement

During decommissioning, all plant and machinery will keep to the existing infrastructure (*e.g.* tracks and hardstanding) and will not track across adjacent grassland/habitats unless this is essential in order to progress the decommissioning works.

The reinstatement of any areas disturbed during the decommissioning works will be undertaken by the Principal Decommissioning Contractor. The Principal Decommissioning Contractor will record excavated volumes and storage areas, and volumes and type of material utilised for reinstatement of relevant areas. This information will be updated for the duration of the decommissioning works and, if necessary, will feed into the decommissioning SWMP.

Reinstatement will be completed using site-won turfs wherever possible without compromising or damaging established/existing habitats. Where insufficient turfs are available, seed mixes may be applied. The seed mix and method of application will be agreed with a suitably qualified ecologist to ensure that the reinstated habitats are compatible with those existing and surrounding the reinstated areas at the time of decommissioning.

All stockpiled materials will be stored in designated areas and isolated from any surface drains and a minimum of 50 m away from surface water where possible. Aggregate or fine materials storage will be enclosed and screened/sheeted.

Topsoil and vegetation must be stored separately from subsoil and shall be retained and reinstated on all areas of stripped ground as soon as possible to prevent erosion and leaching/loss of nutrients. Turfs shall be reinstated with the vegetated side facing upwards, in order to speed up the re-generation process, minimise the need for re-seeding, and help maintain the original species mix.

3.3 Ecological Protection

As noted under Section 3.2, ground disturbance out with the existing infrastructure footprint will be avoided, and if required will be kept to an absolute minimum. Access routes and disturbance areas will be identified prior to decommissioning works commencing. Ecological surveys will be undertaken prior to commencement of decommissioning to ensure that works will not impact on any protected species.



Should any decommissioning works be undertaken within the breeding bird season (March to July inclusively), the Applicant will appoint an ecologist/ornithologist to provide advice and undertake bird mitigation and monitoring during the decommissioning works. The ecologist will be appointed prior to the beginning of the breeding bird season and they will liaise with SNH/NatureScot with regard to possible bird deterrent measures, mitigation measures timing etc. Any advice and recommendations for mitigation measures provided by the ecologist, in consultation with SNH/Nature Scot, will be taken into account during the scheduling and undertaking of decommissioning works.

3.4 General Pollution Prevention Measures

General pollution prevention measures will be detailed in the CEMP prepared prior to construction of the Development. The following section summarises these measures in accordance with current best practice.

Any material or substance which could cause pollution, including fuels/oils, wet cement, raw concrete or silty water will be prevented from entering groundwater, surface water drains or surface waters by the appropriate use of and appropriate placement of (temporary), *e.g.* cut-off drains and silt traps. Any sign of ineffective water treatment measures or evidence of silted or contaminated water entering surface water on-site, will be reported immediately to the Principal Decommissioning Contractor.

All refuelling will be carried out in a designated area over an impermeable surface (hardstanding/protective layer/trays) at least 50 m from surface waters/surface water drains where possible. Refuelling and transfer of fuels will only be carried out under the supervision of an appropriately trained supervisor. Fuel pipes on plant outlets at fuel tanks etc. will be regularly checked and maintained to ensure that no drips or leaks to ground occur. The following precautions will also be installed on fuel delivery pipes:

- Any flexible pipe, tap or valve must be fitted with a lock where it leaves the container and be locked when not in use;
- Flexible delivery pipes must be fitted with manually operated pumps or a valve at the delivery end that closes automatically when not in use;
- The pump or valve must have a lock and be locked when not in use;
- Warning notices including "No smoking" and "Close valves when not in use" shall also be displayed; and
- Spill kits will be available within each plant on-site and also located close to identified pollution sources or sensitive receptors (fuel storage areas, drains etc).

Irrespective of the buffer distance and location of refuelling, interceptor drip trays (or similar, *e.g.* plant nappies, – open metal drip trays are not acceptable) will be available in accordance with standard good practice. Interceptor drip trays will be positioned under any stationary mobile plant to prevent oil contamination of the ground surface or water. Plant and site vehicles are to be well maintained and any vehicles leaking fluids must be repaired or removed from site immediately. Any servicing operations shall take place over drip trays.

Areas of waste oil/fuel/chemical storage and refuelling will be located 50 m away from surface waters or drainage paths. Such storage areas will be appropriately sited to prevent the downward percolation of contaminants to natural soils and groundwater.

Fuel, oils and chemicals will be stored on an impervious base within a bund able to contain at least 110% of the volume stored. Rainwater will not be allowed to accumulate within the bund and in any way compromise the required 110% volume capacity. No tanks or containers may be perforated or dismantled on-site. A competent operator shall empty all contents and residues for safe disposal off-site in accordance with current waste regulations.



3.5 COSHH

The Principal Decommissioning Contractor is responsible for ensuring that all materials ordered or brought to Site, listed as hazardous under the Control of Substances Hazardous to Health (COSHH) Regulations (or the applicable regulations at time of decommissioning), are accompanied with a hazardous information sheet.

The Principal Decommissioning Contractor is responsible for carrying out a risk assessment of each substance and ensuring that all appropriate storage, protective equipment and if necessary, emergency procedures are put in place on-site.

All COSHH materials must be stored in appropriate containers, must be indelibly and legibly labelled to identify the contents, hazards and precautions required.

Any spent (contaminated) spill kits, absorbent granules, sheets or fibres must be disposed of in accordance with COSHH regulations and SWMP requirements.

3.6 Stripping and Demolition of Control Building

Following the decommissioning of Corriegarth 2 Wind Farm, a programme of works will commence which will restore the area surrounding the switchgear building and compound. There will be no welfare facilities/foul drainage with the building as agreed with the Applicant's construction engineers, and consequently no associated foul drainage.

All internal electrical and mechanical equipment, fixtures and fittings, and furniture shall be removed from the building prior to demolition. Removed equipment, fixtures and fittings will be recycled so far as practicable. There will likely be a demand for second hand electrical components and a number of high value High Voltage (HV) electrical items within the control building will likely be decommissioned and removed intact by low-loader.

The control building will likely be constructed of insulated blockwork with rendered external finishes. The building will likely be of single storey construction with roof construction consisting of concrete roof tiles on battens and ply overlying roof felt and trusses. The ceiling void is likely to be insulated.

The superstructure of the substation building shall be demolished following the removal of the necessary items described above. Materials shall be segregated for appropriate disposal off site and recycled so far as reasonably practicable.

Roof tiles would be removed and reduced to rubble, battens and trusses would be removed and the material either re-allocated to the landowner or removed from site. Blockwork would then be demolished using an excavator and insulation materials safely disposed of. The foundation concrete would then be broken up and used as backfill in demolished turbine foundations.

3.7 Reinstatement of Substation Hardstanding

Following the demolition of the substation control building the associated hard-standing will be removed to approximately 0.5 m depth. The hardstand will then be reinstated with soil/peat sourced locally.

The decommissioning of the substation compound will occur in tandem with the decommissioning of Corriegarth 2 Wind Farm, and will restore the site in lines with current best practice at the time of decommissioning. As technology develops and experience of decommissioning this type of development grows, best practice will evolve. This DRP will be updated with the latest methods at least 3 years prior to decommissioning and agreed with statutory consultees.



4 SUMMARY

The DRP presents the current methods and technologies that would be used to decommission and restore the Development. As technology develops and experience of decommissioning this type of development increases, best practice will evolve. The Decommissioning Statement will be updated with the latest methods and best practice in agreement with statutory consultees, prior to decommissioning. The update will include all wind farm infrastructure.



The Scottish Government Energy Consents Unit

Scoping Opinion On Behalf Of Scottish Ministers Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Corriegarth 2 Wind Farm

Corriegarth 2 Windfarm Ltd

27 April 2020

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1. Introduction

- 1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to **Corriegarth 2 Windfarm Ltd** (a wholly owned subsidiary of BayWa r.e. Uk Limited) a company incorporated under the Companies Acts with company number **07538870** and having its registered office at **22 Chancery Lane, London, WC2A 1LS** ("the Company") in response to a request dated **17 February 2020** for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed **Corriegarth 2 Wind Farm** ("the proposed development"). The request was accompanied by a scoping report.
- 1.2 The proposed development would be located adjacent to the operational Corriegarth Wind Farm approximately 15 km northeast of Fort Augustus and 10 km southeast of Foyers. The site boundary is not yet confirmed and is centred on National Grid Reference 256250, 814349.
- 1.3 The development will consist of approximately 18 turbines with a generating capacity of up to 5.6 mw per turbine and with a total generating capacity of up to 100.8. The turbines will have a maximum height to blade tip of 149.9 m. The development may also include battery storage systems.
- 1.4 In addition to 18 wind turbines there will be ancillary infrastructure including:
 - Crane hardstandings
 - Extension to operational access tracks
 - Transformers
 - Underground cable
 - Construction of a new substation
- 1.5 The Company indicates the proposed development would be decommissioned after **35 years** and the site restored in accordance with the decommissioning and restoration plan.
- 1.6 The proposed development is solely within the planning authority of **Highland Council**.

2. Consultation

- 2.1 Following the scoping opinion request a list of consultees was agreed between **Arcus Consultancy Services** (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on **28 February 2020**. The consultation closed on **Friday 20 March**. Extensions to this deadline were granted to the Highland Council and RSPB. The Scottish Ministers also requested responses from their internal advisors Marine Scotland, Transport Scotland and Scottish Forestry. A full list of consultees is set out at **Annex A**.
- 2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.
- 2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.
- 2.4 No responses were received from: The Crown Estate, Civil Aviation Authority, John Muir Trust, Fisheries Management Scotland, Scottish Wildlife Trust, Scottish Wild Land Group, Visit Scotland, Stratherrick and Foyers Community Trust, Ness and Beauly Fisheries Trust and Findhorn District Salmon Fisheries Board. Scottish Rights of Way and Access Society did not have capacity to respond at this time.
- 2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section **36** consent is submitted subsequent to this EIA scoping opinion.
- 2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

- 3.1 This scoping opinion has been adopted following consultation with the **Highland Council**, within whose area the proposed development would be situated, Scottish Natural Heritage, Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.
- 3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated **17 February 2020** in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.
- 3.3 A copy of this scoping opinion has been sent to **Highland Council** for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.
- 3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A**.
- 3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Section **3.1** of the scoping report.
- 3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.
- 3.7 The proposed development set out in the Scoping Report refers to wind turbines, and grid technologies including battery storage and/or solar panels. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to:
 - the scale of the development (dimensions of the wind turbines, solar panels, battery storage)
 - components required for each generating station
 - minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage

- 3.8 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.
- 3.9 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.
- 3.10 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures.
- 3.11 The scoping report identified viewpoints at Table **5.2** to be assessed within the landscape and visual impact assessment. The Highland Council requested additional viewpoints, as detailed on section **3.6** of page 4 of their scoping response.
- 3.12 The noise assessment should be carried out in line with relevant legislation and standards as detailed in section **9** of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise".
- 3.13 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

- 5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.
- 5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.
- 5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.
- 5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.
- 5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.
- 5.6 Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development once an application is submitted.
- 5.7 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.
- 5.8 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB). In addition, a separate disc containing the EIA report and its associated documentation in electronic format will be required.

Magnus Hughson Energy Consents Unit 27 April 2020

ANNEX A

Consultation

List of consultees

- Highland Council 1
- Cairngorms National Park Authority 24
- Historic Environment Scotland 25
- Scottish Environment Protection Agency -27
- Scottish Natural Heritage 36
- Stratherrick and Foyers Community Trust*
- Findhorn District Salmon Fisheries Board*
- Ness and Beauly Fisheries Trust*
- British Horse Society 40
- British Telecommunications plc 44
- Civil Aviation Authority Airspace*
- Crown Estate Scotland*
- Defence Infrastructure Organisation 47
- Fisheries Management Scotland*
- Highlands and Islands Airports Ltd 49
- Joint Radio Company Limited 51
- Mountaineering Scotland 53
- NATS Safeguarding 55
- RSPB Scotland 58
- Scottish Rights of Way and Access Society
- Scottish Water 60
- Scottish Wildlife Trust*
- Visit Scotland*

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Marine Scotland and Scottish Forestry.

^{*}No response was received.



Simon Hindson

01463 785047

20/01003/SCOP

ECU00002025

06 April 2020

simon.hindson@highland.gov.uk

Please ask for:

Direct Dial:

Your Ref:

E-mail:

Date:

Our Ref:

Corriegarth 2 Wind Farm Limited c/o Magnus Hughson Consents Manager Energy Consents Unit

By email only to: magnus.hughson@gov.scot Jillian.Adams@baywa-re.co.uk

Dear Magnus,

PLANNING REFERENCE: 20/001003/SCOP

DEVELOPMENT: CORRIEGARTH 2 WIND FARM - A WIND FARM OF 18 TURBINES WITH A

MAXIMUM TIP HIEGHT OF 149.9M TO TIP AND ANCILLARY INFRASTRUCTURE

LOCATION: LAND 27400M SOUTH EAST OF GARTHBEG BUNGALOW, GORTHLECK,

INVERNESS

Thank you for consulting The Highland Council on the Environmental Impact Assessment Scoping Request for the above project. We received the consultation on 28 February 2020 by email and we are grateful for the extension to make comments until 07 April 2020.

Our view on the scope of the assessment may be subject to change on a number of topics within the EIAR if the scale development, in terms of the number and height of turbines, changes.

The remainder of this letter constitutes The Highland Council's response to the consultation. Throughout the text we have sought to respond to the questions posed in the Scoping Report where they are applicable to The Highland Council.

SCOPING RESPONSE TO ENERGY CONSENTS UNIT

Applicant: Corriegarth 2 Wind Farm Limited

Project: Corriegarth 2 Wind Farm Limited

Project Address: Land 27400m South East of Garthbeg Bungalow, Gorthleck,

Inverness

Our Reference 20/01003/SCOP

This response is given without prejudice to the Planning Authority's right to request information in connection with any statement, whether Environmental Impact Assessment Report or not, submitted in support of any future application. These views are also given without prejudice to the future consideration of and decision on any planning application received by the Council.

The Highland Council request that any Environmental Impact Assessment Report (EIAR) submitted in support of an application for the above development take the comments highlighted below into account; many of which are already acknowledged within the Scoping Report submitted. In particular, the elements of this report as highlighted in parts 3, 4 and 5 should be presented as three distinct elements.

Where responses have been received by internal consultees these are available on the eplanning pages of the Highland Council website and should be taken as forming part of the scoping response consultation from The Highland Council. If any further responses are received these will be forwarded to you as soon as practicably possible.

1.0 <u>Description of the Development.</u>

- 1.1 The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR must include: -
 - a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e. connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid coordinates for all main elements of the proposal should be supplied.
 - a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;
 - the risk of accidents, having regard in particular to substances or technologies used;
 - an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development.
 - The estimated cumulative impact of the project with other consented or operation development.

2.0 <u>Alternatives</u>

- 2.1 A statement is required which outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following:
 - the range of technologies that may have been considered;

- locational criteria and economic parameters used in the initial site selection;
- · options for access;
- design and locational options for all elements of the proposed development (including grid connection);
- the environmental effects of the different options examined.

Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.

3.0 Environmental Elements Affected

3.1 The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area and you are encouraged to use your understanding of these, including the information gathered through the application process for Corriegarth 1 Wind Farm and its construction and operation, in assessing your development. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.

Land Use and Policy

The EIAR should recognise the existing land uses affected by the development having particular regard for The Highland Council's Development Plan inclusive of all statutorily adopted supplementary guidance. Particular attention should be paid to the provisions of the Onshore Wind Energy Supplementary Guidance inclusive of any Landscape Sensitivity Appraisal. This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and guidance on renewable energy and wind energy should be considered in this section. The purpose of this chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy.

Landscape and Visual

3.3 The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape i.e. a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards:

https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments

Separate volumes of visualisations should be prepared to both Highland Council Standards and SNH guidance. These should be provided in hard copy. It would be beneficial for the Highland Council volume to be provided in an A3 ring bound folder for ease of use. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in the view. Without seeing wireframes it is not possible to advise on these at this time. We are happy to provide advice on this matter going forward.

All existing turbines, at Corriegarth 1 and any other wind energy development included in the cumulative baseline, should be re-rendered even if they appear to be facing the viewer in the photograph to ensure consistency.

3.4 This assessment should include the expected impact of on-site borrow pits, battery storage and access

Email: eplanning@highland.gov.uk

roads, despite the fact that the principal structures will be a primary concern. All elements of a development are important to consider within any EIAR, including the visual impact of the tracks which have not already been assessed and consented through the Corriegarth 1 Wind Farm permission.

3.5 It should be noted that there are a number of similar applications in this area which are yet to be determined / concluded in the vicinity of this application, many of these have been identified in the scoping report, which may or may not help clarify the weight towards particular policy elements in the final planning balance. We consider that you should undertake the cumulative assessment over a study area the same as the visual assessment, a minimum 35km study area. As this is the case we recommend that you utilise our interactive Wind Turbine map, which is up to date as of 06 January 2020, to identify other schemes within the study area. The map can be accessed on the link below:

http://highland.gov.uk/windmap

Consultation should also be undertaken with Energy Consents and Deployment Unit as to scheme which are currently at Scoping Stage as these may have advanced at the same pace as your proposal.

- Viewpoints (VP) for the assessment of effects of a proposed development must be agreed in advance of preparation of any visuals with The Highland Council. At this point we would request the following additional viewpoints:
 - A9 in the vicinity of the Kessock Bridge and the north and south bound picnic sites at North Kessock.
 - Cairngorm Mountain Summit representative view from the vicinity of the top of the ski-lifts, and Ptarmigan restaurant should be included.
 - A viewpoint within the Loch Lochy and Loch Oich SLA should be considered to represent views around the Great Glen from the west where the Special Quality of 'Classic Highland Scenery, Distinctive Mountain-top Views' is related to the outstanding views which occur from higher elevations.
 - Viewpoints which represent the Glen Strathfarrar NSA, Glen Affric NSA, Strathconon, Monar and Mullardoch SLA and Moidart, Monar and Glen Shiel SLA:

| Sgurr na Diollaid | 228191 | 836211 | 10.6 | Walkers on hill | Rugged Massif LCT / Strathconan, Monar and Mullardoch SLA / Central Highland WLA |
|----------------------|--------|--------|------|--------------------|---|
| Tom a Choinnich | 216403 | 827337 | 14.5 | Walkers on hill | Rugged Massif LCT / Glen Affric NSA / Strathconan, Monar and Mullardoch SLA / Central Highland WLA |
| Carn Ghluasaid | 214586 | 812511 | 17.8 | Walkers on hill | Rugged Massif LCT / Moidart Morar and Glen Shiel SLA / Kinlochhourn – Knoydart – Morar WLA |

We acknowledge that there will be some micrositing of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. We have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography. New photography should be used wherever possible and the use of the photography used for the Corriegarth 1 Wind Farm will only be acceptable in certain circumstances.

- 3.7 If the size and scale of the turbines changes please reconsult us on the proposed viewpoints.
- 3.8 As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy

schemes within the area as well as those currently under consideration. The detailed location of viewpoints will be informed by site survey, mapping and predicted Zones of Theoretical Visibility. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community takes this into account. The final list of viewpoints should be agreed with the Planning Authority.

- 3.9 The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view or for assessment of impact on designated sites, communities or individual properties.
- 3.10 We are content with a study area of 40km. Given the size of the turbines and we would expect a that a detailed assessment of effects should be undertaken for the whole study area.
- 3.11 When assessing the impact on recreational routes please ensure that all core paths, the national cycle network, Great Glen Way, South Loch Ness Trail and the Loch Ness 360 routes and other long distance trails are assessed. It should be noted that these routes are used by a range of receptors.
- 3.12 The development will further extend the number of proposals of this type in the surrounding area, necessitating appropriate cumulative impact. It is considered that cumulative impact will be a significant material consideration in the final determination of any future application. We agree that the study area for cumulative impacts should extend to 60km. Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council see visualisation standards document. If the applicant wished to utilise this tool there maybe an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined schemes in the Council's Panoramic Viewer please see the link below:

http://www.highland.gov.uk/panoramicviewer

- 3.13 The SNH 2019 landscape character assessment should be used.
- 3.14 We expect an assessment of the impact on Wild Land Areas to be included within the EIAR given the proximity to a number of Wild Land Areas and the theoretical visibility of the scheme from within wild land areas. SNH will provide further advice on this matter.
- 3.15 We expect an assessment of the proposal against the criterion set out in the Council's Onshore Wind Energy Supplementary Guidance to be included within the LVIA chapter of the EIAR.
- 3.16 An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. As part of this the impact on the Special Landscape Areas (SLA) must be undertaken using the SLA citations available from the Council's website.
- 3.17 Aviaition lighting may be required due to the proposed scale and location of the turbines. The affect of the aviation lighting should be assessed through the EIA process. A Lighting Impact Assessment will be required. This is a matter that should be considered from all viewpoints. It should form part of the LVIA chapter of the EIAR but should also be considered as part of the Wild Land Assessment. Further advice on aviation lighting is available from SNH.
- 3.18 We are content that residential visual amenity is assessed within the LVIA chapter.

Ecology

3.19 The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc) interest on site. It needs to be categorically established which species are present on the site, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog,

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in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programme (such as native- tree planting, stock exclusion, etc) for the proposed site should be provided and take into consideration the requirements to be agreed via condition in relation to Corriegarth 1 Wind Farm. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.

- 3.20 The EIAR should provide a baseline survey of the plants (and fungi) and trees present on the site to determine the presence of any rare or threatened species albeit it is accepted that the likelihood is low given the present land use of the site.
- 3.21 The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. SNH can also provide specific advice in respect of the designated site boundaries for SACs and SPAs and on protected species and habitats within those sites as well as the proposed World Heritage Site for the Flow Country. The potential impact of the development proposals on other designated areas such as SSSI's should be carefully and thoroughly considered and, where possible, appropriate mitigation measures outlined in the EIAR. SNH provide advice on the impact on designated sites.
- 3.22 If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats and other interests.
- 3.23 The EIAR needs to address the aquatic interests within local watercourses, including down stream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.
- 3.24 Further advice can be found in SNH's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken.
- 3.25 The EIAR should include an assessment of the effects on Ground Water Dependent Terrestrial Ecosystems (GWDTE). Please see the response from SEPA for detailed advice.

Ornithology

- 3.26 The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the planning application process, not as an issue which can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to the comments of SNH in this respect.
- 3.27 An assessment of the impacts of to birds through collision, disturbance and displacement from foraging / breeding / roosting habitat will be required for both the proposed development site and cumulatively with other proposals. Of particular interest in this area is the Golden Eagle. Consideration should be given to the findings of the research undertaken as part of the NHZ10 Regional Golden Eagle Conservation Management Plan. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.

Noise

3.28 Operational Noise

The applicant will be required to submit a noise assessment with regard to the operational phase of the development. 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 target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above

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background noise levels at up to 12m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development.

3.29 Cumulative Noise

The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted <u>and consented levels</u> from such developments. The good practice guide offers guidance on how to deal with cumulative issues.

The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed.

The assessment should include a table of figures which includes the following: -

- The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s
- The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear.
- The predicted levels from each existing or consented wind farm development at each NSL.
- The cumulative levels based on consented and predicted levels at each NSL.

The assessment should also include an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

3.30 Background Noise Measurements

Background noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer however, it is unlikely that they will be able to attend the installation of equipment. Where possible, sites must avoid other noise sources such as boiler flues, wind chimes, squeaking gate, rustling leaves etc. Otherwise, the results may not be valid for any other property.

Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys. It is advised that the developer consults the Councils Environmental Health Officer at an early stage to discuss the proposed methodology.

3.31 Construction Noise

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.

A construction noise assessment will be required in the following circumstances: -

Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive

receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm

OR

• Where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months)

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

Amplitude Modulation

3.32 Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

Noise Exposure

3.33 When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite.

Cultural Heritage

- 3.34 The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify: -
 - the architectural heritage (Conservation Areas, Listed Buildings) and
 - the archaeological heritage (Scheduled Monuments).
 - the landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development.
 - the inter-relationship between the above factors.
- 3.35 We would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. It would be helpful if, where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings could be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.
- 3.36 Historic Environment Scotland (HES) will provide comment on the assessment methodology for heritage assets within their remit.
- 3.37 It is anticipated that HES will provide further comments on the scope of the assessment and their requirements for supporting information (including visualisations) and the potential impacts on heritage assets in their consultation response.
- 3.38 There are a large number of heritage assets in the vicinity of the development, these need to be assessed. HES have provided detailed advice on potential setting impacts.

3.39 We recommend that you liaise with colleagues in the Council's Historic Environment Team on the scope of the archaeological assessments.

Water Environment

- 3.40 The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.
- 3.41 If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.
- 3.42 The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.
- 3.43 You should carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies but it is not definitive. An on-site survey will be required.
- 3.44 It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.

Geology, Hydrology and Geohydrology

- 3.45 The EIAR must consider the risks of engineering instability relating to presence to peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.
- 3.46 The EIAR should include a full assessment on the impact of the development on peat. SEPA have noted that the information collected so far shows that most of the site is on deep peat, with large areas of very deep peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of

- infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micrositing limits.
- 3.47 SEPA have provided detailed comments on methodology for peat probing and the peat assessment. These comments are supported by the Council.
- 3.48 Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm. A separate assessment of the carbon emmissions as a result of construction of the wind farm should eb submitted and a scheme for offsetting this, either through biodiversity net gain or compensatory plating should be submitted.
- 3.49 The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.

Roads Infrastructure

- 3.50 Highland Council's Transport Planning Teams interests will relate largely to the impact of development traffic on the Council maintained road network and its users during the construction phase of the project. It has confirmed that it is generally satisfied with the proposed changes to the methodology. The community have also raised concerns around these matters.
- 3.51 A Transport Assessment (TA), or section on traffic and transportation, within the Environmental Statement for the project will be required. The TA should identify all roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic, including abnormal load movements, on these roads. Where necessary, the TA should consider and propose measures necessary to mitigate the impact of the development on the road network. Prior to preparation of the TA the developer should first carry out a detailed scoping exercise in consultation with the Council, as local roads authority and, as required, Transport Scotland as trunk roads authority.
- 3.52 Matters to be included in the Transport Assessment/Transport Statement:
 - Identify all public roads affected by the development. In addition to transport of major components this should also include routes to be used by local suppliers.
 - Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:
 - assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required.
 - · road surface condition and profile
 - assessment of structures and any weight restrictions
 - road widths, vertical and horizontal alignment and provision of passing places;
 - details of adjacent communities
 - Traffic resulting from the proposed development including: -
 - nos. of light and heavy vehicles
 - abnormal loads. In respect of long loads trial runs are required.
 - duration of works

- Current traffic flows including use by school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.
- Impacts of proposed traffic including: -
 - impacts on carriageway, structures, verges etc.
 - impacts on other road users
 - impacts on adjacent communities
 - swept path and gradient analysis where it is envisaged that passage of traffic could be problematic.
- Cumulative impacts with other developments in progress and committed developments.
- Proposed mitigation measures to address impacts identified above including: -
 - details of the proposed site access at its junction with the public road to the standards set out in The Highland Council's Roads and Transportation Guidelines for New Developments available online at:

http://www.highland.gov.uk/yourenvironment/roadsandtransport/roads/roadsandtransportguidelinesfornewdevelopments.htm

- carriageway strengthening
- strengthening of bridges and culverts
- carriageway widening and/or edge strengthening
- provision of passing places
- road safety measures
- traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.
- Details of residual effects.
- 3.53 The EIAR must consider the implications on the Trunk Road network as part of the EIAR process.

Socio-Economic, Recreation and Tourism

- 3.54 We consider that this should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development.
- 3.55 Estimations of who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc should be included. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.
- 3.56 The site is on land with access rights provided by the Land Reform Scotland Act. Access rights on a core path are not enhanced but they are more protected during construction and similar activities. In line with the policies and provisions of the Highland-wide Local Development Plan a plan detailing the

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following should be submitted as part of the EIAR:

- Existing public non-motorised public access footpaths, bridleways and cycleways on the site
 and any proposed access route from the public road infrastructure; and
- Proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water.
- Impacts of the proposed development on the core paths and proposed mitigation if any.

The application should be accompanied by an Access Management Plan and consider the requirement for any stopping up orders.

Effects on Existing Infrastructure

- 3.57 The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained within the EIAR to determine whether any suspensive conditions are required in relation to such issues.
- 3.58 There should be dialogue with HIAL over the impact on the radar at airports in the area.
- 3.59 If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.

Shadow Flicker

3.60 If there are no properties within 11 rotor diameters, which is the Council's approach to shadow flicker due to the lower sun given the latitude of the development, the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIAR.

Trees and Forestry

- 3.61 The site is currently forested and this should be fully considered in the EIAR. The Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIAR.
- 3.62 The EIAR should indicate all the areas of woodland / trees that will felled to accommodate the development, including any off site works / mitigation. Compensatory woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If so minded, permission is only likely to be granted on the basis that compensatory planting proposals are identified in advance. Compensatory planting should be within the Highland area and not form part of an already approved forestry plan/proposal that has gained FC funding. Areas of retained forestry or tree groups should be clearly indicated and methods for their protection during construction and beyond clearly described. If timber is to be disposed of, details of the methodology for this should be submitted.

Other Matters

- 3.63 We consider that the EIAR needs to address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted.
- 3.64 Depending on the proximity of the working area to houses etc. the applicant may require to submit a

- scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.
- 3.65 The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction, etc.
- 3.66 A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application.

4.0 Significant Effects on the Environment

- 4.1 Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from: -
 - · the existence of the development;
 - the use of natural resources;
 - the emission of pollutants, the creation of nuisances and the elimination of waste.
- 4.2 The potential significant effects of development must have regard to: -
 - the extent of the impact (geographical area and size of the affected population);
 - the trans-frontier nature of the impact;
 - · the magnitude and complexity of the impact;
 - the probability of the impact;
 - the duration, frequency and reversibility of the impact.
- 4.3 The effects of development upon baseline data should be provided in clear summary points.
- 4.4 The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.
- 4.5 The applicant should provide a description of the forecasting methods used to assess the effects on the environment.

5.0 Mitigation

- 5.1 Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reducing and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.
- The mitigation being tabled in respect of a single development proposal can be manifold. Consequently the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). Further guidance can be obtained at

http://www.highland.gov.uk/NR/rdonlyres/485C70FB-98A7-4F77-8D6B-

ED5ACC7409C0/0/construction environmental management 22122010.pdf

This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.

5.3 The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.

If you would like to discuss this scoping response please contact the Planning Authority using the details at the end of this response.

Simon Hindson Team Leader – Strategic Projects

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E-mail: simon.hindson@highland.gov.uk

Consultee Comments for Planning Application 20/01003/SCOP

Application Summary

Application Number: 20/01003/SCOP

Address: Land 27400M SE Of Garthbeg Bungalow Gorthleck Inverness

Proposal: Corrriegarth 2 Wind Farm - A wind farm of 18 turbines with a maximum tip height of

149.9 m, and ancillary infrastructure

Case Officer: Simon Hindson

Consultee Details

Name: . ACCESS OFFICER Inverness, Nairn and East Lochaber Address: Round Tower, Inverness Castle, Inverness IV2 3EG

Email: Stewart.Eastaugh@highland.gov.uk

On Behalf Of: Access Officer

Comments

The report is not quite correct in some of its assertions about recreation.

A core path and public right of way will be physically affected by the proposal. That route is also part of the Trail of the 7 Lochs, the upgrade of which the Council contributed to financially recently.

More accurate detail might reasonably be expected from this report along with proposed mitigation measures that minimise the negative impact of the proposal on public access and maximise the positive. These will form the basis of an access management plan.

We will seek to avoid the unfortunate mis-signing during the previous windfarm development in this area.

Consultee Comments for Planning Application 20/01003/SCOP

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Consultee Details

Name: . FLOOD RISK MANAGEMENT TEAM

Address: The Highland Council Headquarters, Glenurquhart Road, Inverness IV3 5NX

Email: Richard.Bryan@highland.gov.uk

On Behalf Of: D & I Flood Team

Comments

The flood team has no comment at this stage



Memorandum

To: Planning Service (Simon Hindson – Case Officer)

From: Transport Planning Team

Subject: Corriegarth 2 Wind Farm EIA Scoping

Date: 26 March 2020

Your ref: 20/01003/SCOP

Thank you for giving us the opportunity to comment on the information submitted in support of the above Scoping Application. Our findings have been set out below based on the questions set out in Section 10.7 from the Scoping Document.

No site visit has been undertaken, with this response being based on a desk-top assessment exercise.

Are Consultees content with the proposed methodology and scope of the traffic and transport assessment?

Our general requirements for assessing the transport impacts of wind energy generation developments on the local road network are set out in the attached supporting note. We would expect this proposal to adhere with that approach.

We note and welcome the intention to use overall traffic and HGV traffic increases as the triggers for needing to assess impacts. For clarity, we expect 10% HGV increases to also be considered at sensitive locations. With regards to this, we would expect local schools and community facilities within the towns and small communities located along the proposed access route(s) to be classified as sensitive locations.

With regards to the key considerations being scoped into the assessment, we would expect this to also include the physical condition of the roads and their structural capability, or not, to safely accommodate the proposed vehicle numbers and loadings without generating new road safety hazards for all road users. The document refers to there having been significant improvements to the roads in this

area. However, it doesn't recognise that there are still significant stretches that remain substandard, both in terms of geometry and structural form. Highland Council has developed the South Loch Ness Road Improvement Strategy setting out an approach for improving the local roads that this development would need to use for access. When reviewing the suitability of access routes and possible mitigation, which is unlikely to be limited to abnormal load movements as suggested in the Scoping submission, discussions should be held with the Officers overseeing the above Strategy. An initial point of contact would be Colin Ross (Colin.Ross@higland.gov.uk).

A key aspect of the South Loch Ness Road Improvement Strategy is delivering village improvement schemes within communities along these routes, reflecting that they have few, if any, dedicated facilities for pedestrians and cyclists, whilst experiencing extensive periods of significant HGV traffic increases during the construction of such energy generation and distribution schemes. This is why we don't necessarily agree with the statement in Section 10.6 that the volume of construction traffic is unlikely to cause any significant disruption to traffic, cyclists or other road users. We note and welcome that the Scoping document proposes to consider severance within the EIA, whilst also recognising that the access arrangements during construction could lead to loss of general amenity. Such issues are likely to be felt most within the local communities along the proposed access route(s). Therefore, be aware that discussions with Officers involved in the South Loch Ness Road Improvement Strategy may identify the need for this development to deliver or contribute towards the implementation of such village improvement schemes.

In addition to physical mitigation, there will also be traffic management measures required to safely operate an access strategy for this development that limits, wherever possible, impacts on other road users and the local communities along those routes. Any submission should therefore include a Framework Construction Traffic Management Plan (CTMP) that sets out the access restrictions and management measures that any Contractor will be expected to work within when constructing this development.

Section 10 of the Scoping document says that the construction access route(s) to the site have not yet been confirmed. However, Section 10.4 anticipates that abnormal load movements for turbine components will be from the north via the A9, B851 and

B862, with other general construction traffic (staff and material) being from the south via Fort Augustus along the A82 and B862. Given the scale of tourist traffic within Fort Augustus during peak season and the general road conditions connecting the site to Fort Augustus, we would not support light or heavy goods traffic linked with this development going through Fort Augustus. All such goods traffic serving this site should be routed from the A9 down the B851 and B862.

When determining the existing baseline traffic levels, we recommend that consideration of any data gathered reflects that this part of The Highlands can experience significant traffic increases during the peak tourist season, given the connections through to Loch Ness. Also, the appraisal should consider what additional traffic there could be from other committed developments expected to be making use of those routes when this development is due to be being constructed. We recommend that a review is undertaken of existing Planning Permissions and Applications from our website. When you've identified those possible other developments, Highland Council Planners should be asked to confirm if they agree with your assessment and to identify any potential developments they feel should be included which haven't been.

When assessing the capability of routes to accommodate abnormal load turbine components, we'll be looking for the preferred route to undergo a trial run using an equivalent sized vehicle. This is to prove access is achievable and to establish the extent of any works required on the route to facilitate transportation. Given the proposed sizes of turbines, the routes out of Inverness Harbour onto the strategic trunk road network, or from any other ports used, will need to be assessed as we're not clear if they will have been assessed before for such large components.

Are Consultees aware of any specific access restrictions or limitations on the proposed abnormal loads route?

When selecting the routing for abnormal loads, we recommend that early approaches are made to the team that considers abnormal load movements (Abnormal.Loads@highland.gov.uk) and to our structures team (structures-section@highland.gov.uk). A key contact in the structures team is Normal Smart (Norman.Smart@highland.gov.uk).

Are Consultees content to scope out operational and decommissioning traffic

from further assessment?

We note your intention to scope out the operational and decommissioning impacts from the EIA with regards to traffic and transport. We have no objection to the

operational impacts being scoped out but ask that the predicted trip numbers and

likely vehicle types are clarified in the submission to support that.

With regards to the decommissioning aspect, we note that an element of the

justification for that is based on the access tracks being left in for future land

management purposes. This may not be accepted through consideration of the

planning application, particularly if there could be a lasting visual impact from such

tracks. Given this, we ask that the predicted trip numbers and vehicle types during the decommissioning process are fully set out and justified, including the worst case

scenario of the access tracks needing to be removed. If it can then be clearly

demonstrated that the predicted trip numbers and patterns will be significantly less

than during the construction process, we would have no objection to the

decommissioning phase being deemed out of scope for the EIA from a traffic and

transport perspective.

With regards to access tracks, if there is a justifiable need to retain some form of

access route(s) through the landscape to the site, we recommend that consideration

is given to reducing the scale of any such track(s) and changing their form to limit

their lasting visual impacts

Transport Planning Team

Transport Methodology:

- 1. Identify all public roads affected by the development. It is expected that the developer will confirm their preferred access route(s) in their submission, both for abnormal loads and for general construction traffic, staff and suppliers. All other possible access route options should be identified, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process to arrive at the preferred route(s). Although the current scoping document has identified Inverness as the likely port of entry for turbine components, the documentation doesn't appear to suggest that this is finalised. We will expect the final submission to have settled this. The current proposal for larger turbines will require an assessment into the capability of safely getting out of the preferred port onto the strategic road network, as such large components may not have been tested in terms of getting out of the port(s) under consideration.
- 2 Set out the existing nature and condition of these public roads. This should include:
 - The road name and number, where applicable.
 - Road widths, including any pinch points.
 - The nature of their horizontal and vertical alignments, including any known steep gradients.
 - An assessment of the carriageway strength including, where necessary, construction depths and road formation where there is likely to be significant impacts. This may include the need for non-destructive testing or sampling as required to determine the carriageway construction and strength. This work should be undertaken by a suitably capable and qualified consulting engineer acceptable to The Council.
 - The location of any structures either spanning or supporting the roads, including a
 description of their nature (eg bridge, culvert etc), any width, and height or weight
 restrictions and where necessary, an assessment of their load carrying capability. This
 work should be undertaken by a suitably capable and qualified consulting engineer
 acceptable to The Council.
 - The nature and quantum of properties and other development types serviced by the roads. In addition to the quantum of residential properties, specific recognition should be made of any sensitive facilities such as schools, businesses or other community facilities along the roads.
 - The nature and quantum of existing traffic flows on these roads. This should include reference to how often the roads are used by school or commercial bus services and whether the routes are used by pedestrians, cyclists and equestrians or have any formal national or local designation for such uses (eg National Cycle Network, long-distance paths).
- Identify the anticipated impacts from the proposed development, including any cumulative impacts from other developments that have the potential to be happening at the same time. These impacts should include:
 - The quantum of new traffic impacting on these roads throughout the construction, operation and decommissioning periods of this development. This should cover:
 - o numbers of light and heavy vehicles (differentiated)
 - numbers of abnormal loads
 - o profiles of anticipated new traffic movements throughout the duration of the works As part of producing this information, consideration should be given to minimising levels of construction traffic by, as far as possible, utilising site won materials for the creation of new or enhanced access tracks and for use in concrete production. Any assumptions used in quantifying predicted traffic flows should be clearly set out and justified in the submission.

- Any impacts to existing carriageways, structures, verges or other aspects of these public roads. This should include information on swept paths and gradient analysis where it is envisaged that the passage of traffic could be problematic.
- Trial Runs for abnormal loads to be carried out in order to prove the route is achievable and/or to establish the extent of works required to facilitate transportation.
- The location of any new or changes to existing accesses off these public roads to be used for accessing this development. This should include the extent of existing visibility from each of these accesses onto the public roads.
- Any impacts or restrictions needing to be imposed on existing road users.
- Any impacts or restrictions needing to be imposed on adjacent properties or local communities serviced by these public roads.
- 4 Set out the proposed mitigation measures needed to tackle the anticipated impacts set out above. This should be developed with Officers involved in the South Loch Ness Road Improvement Strategy and may include:
 - The location and nature of any carriageway widening or strengthening.
 - Works to improve the visibility at proposed access points with public roads and at junctions along the proposed access routes.
 - The location and nature of any strengthening or widening needed to existing structures.
 - The provision of new or enhanced passing places on single track roads.
 - Road safety measures deemed necessary to effectively manage the impacts of traffic linked with this development.
 - Traffic management proposals deemed necessary to enhance compliance with the traffic management plan associated with the construction and ongoing operation of this development.

It should be noted that any such mitigation may need to be specifically considered within the wider considerations of the EIA, depending on the form, scale and location of the works proposed and their potential impacts to any existing environmentally sensitive sites.

5 Details of any residual effects on the road network and its users following the implementation of the proposed mitigation outlined above and any actions proposed associated with those residual effects.

The above information is not exhaustive and should be used as a guide to submitting all relevant information in relation to roads, traffic and transportation matters arising from the development proposals.

Designs for changes to the local public road network should take reference from our published Roads and Transport Guidelines for New Developments.

Consultee Comments for Planning Application 20/01003/SCOP

Application Summary

Application Number: 20/01003/SCOP

Address: Land 27400M SE Of Garthbeg Bungalow Gorthleck Inverness

Proposal: Corrriegarth 2 Wind Farm - A wind farm of 18 turbines with a maximum tip height of

149.9 m, and ancillary infrastructure

Case Officer: Simon Hindson

Consultee Details

Name: . Forestry Team

Address: The Highland Council Headquarters, Glenurquhart Road, Inverness IV3 5NX

Email: grant.stuart@highland.gov.uk

On Behalf Of: HQ Forestry

Comments

If the existing access track to the operational substation is used then there should be no adverse impact on woodland up to that point. There is no woodland to the east of the substation so the proposed new turbines and any associated infrastructure would not impact on woodland.

There is no requirement to consider forestry within any subsequent application and forestry can be scoped out.

Melrose J (Joyce)

From: Nina Caudrey <ninacaudrey@cairngorms.co.uk>

Sent: 05 March 2020 14:01

To: Hughson M (Magnus); Econsents Admin

Cc: Dan Harris; Planning

Subject: RE: Section 36 - Corriegarth 2 Wind Farm - scoping

Thank you for consulting us on the above proposal. The proposed development is located approximately 10km outwith the National Park boundary.

In accordance with our working protocol with Scottish Natural Heritage (SNH), available via https://www.nature.scot/agreement-roles-advisory-casework-between-scottish-natural-heritage-and-scottish-national-park, SNH provide advice on the potential effects of development outwith the Park on the Special Landscape Qualities of the Park. We therefore have no comments to make at this stage and refer you to their advice.

Should you have any queries about the above, please contact $\underline{planning@cairngorms.co.uk}$.

Many thanks

from Nina

Nina Caudrey, MRTPI

Planning Officer (Development Planning)

Cairngorms National Park Authority, 14 The Square, Grantown on Spey, PH26 3HG

Direct dial: 01479 780408

From: Magnus.Hughson@gov.scot [mailto:Magnus.Hughson@gov.scot]

Sent: 28 February 2020 12:14 **To:** Econsents_Admin@gov.scot

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear consultee,

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CORRIEGARTH 2 WIND FARM

On 17 February 2020, Corriegarth 2 Windfarm Limited (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for Corriegarth 2 Wind Farm. The proposed development is for a wind farm of 18 turbines with a maximum tip height of 149.9 m, and ancillary infrastructure, located in the planning authority area of the Highland Council in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and associated figures can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:



By email: econsents admin@gov.scot

Magnus Hughson Energy Consents Unit 4th Floor, 5 Atlantic Quay 150 Broomielaw Glasgow G2 8LU Longmore House Salisbury Place Edinburgh EH9 1SH

Enquiry Line: 0131-668-8716 HMConsultations@hes.scot

> Our case ID: 300040527 Your ref: ECU00002025 18 March 2020

Dear Mr Hughson

Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Request for Scoping Opinion for Proposed Section 36 Application for Corriegarth 2 Wind Farm

Thank you for your consultation which we received on 28 February 2020 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

We understand that the proposed development comprises 18 wind turbines with tip heights of up to 149.9 m with associated infrastructure. The proposed new turbines would be located adjacent to the operational Corriegarth Wind Farm, which consists of 23 turbines with height to tip of 120m.

Scope of assessment

We are content with the scope of assessment identified for our interests in the report. At this stage, we have not identified any impacts which we consider likely to be significant. We therefore have no further advice to offer on the scope of assessment.

We recommend that any assessment of cultural heritage impacts should refer to the <u>EIA Handbook</u> which provides a sample methodology. Reference should also be made to our <u>Managing Change guidance note on Setting</u>.



Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at https://conservation.historic-scotland.gov.uk/.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron, who can be contacted by phone on 0131 668 8657 or by email on Ruth.Cameron@hes.scot.

Yours sincerely

Historic Environment Scotland



Our ref: PCS/170370 Your ref: ECU00002025

If telephoning ask for: Aden McCorkell

19 March 2020

Magnus Hughson Energy Consents Unit Scottish Government 5 Atlantic Quay 150 Broomielaw Glasgow G2 8LU

By email only to: Econsents Admin@gov.scot

Dear Mr Hughson

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017
Corriegarth 2 Windfarm
Land 3660M SE of Garthbeg Farm, Gorthleck, Inverness

Thank you for consulting SEPA on the scoping opinion for the above development proposal by way of your email received on 28 February 2020.

Advice to the planning authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection**, the information outlined below and in the attached appendix must be submitted in support of the application.

- Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications.
- b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.

Bob Downes Chief Executive Terry A'Hearn

- c) Map and assessment of impacts upon groundwater abstractions and buffers.
- d) Peat depth survey and table detailing re-use proposals.
- e) Map and site layout of borrow pits.
- f) Schedule of mitigation including pollution prevention measures.
- g) Borrow Pit Site Management Plan of pollution prevention measures.
- h) Decommissioning statement.





Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment.

1. Site specific comments

- 1.1 We welcome reference in Section 2.2 of the Scoping Report which states that "the Development will make use of the Operational Corriegarth Wind Farm infrastructure where possible, including the existing access tracks leading from the B862". We would also expect existing infrastructure such as laydown areas or borrow pits to be re-used in order to minimise further impacts to the environment. Our preference is to have already disturbed areas utilised and to safeguard undisturbed habitat.
- 1.2 The layout should be designed to minimise the disturbance of peat and be supported by a full site specific Peat Management Plan. Depending on the results of the peat depth survey, piling turbine bases and floating all infrastructure on site should be considered. Please refer to the Scottish Government's Guidance on Developments on Peatland Peatland Survey (2017) and refer to Paragraph 3 in the appendix below for further submission requirements relating to peat.
- 1.3 We would be fully supportive of any investigations which would seek to compensate for any historic or proposed impacts to the site, and add environmental improvements where appropriate. The application should include any opportunities for peatland restoration proposals to help compensate for the peat disturbance caused by the development. This could form part of the proposed Habitat Management Plan, a draft of which should be included in the submission.
- 1.4 The interlinking tracks to the proposed turbines should be demonstrated to be as short as possible and we are unlikely to support paralleling tracks or excessive use of spurs for example. We would also encourage the restoration of any redundant tracks on site to compensate for the impacts of the proposal.
- 1.5 There are numerous watercourses on this site and connecting tracks will need to be carefully considered to demonstrate how they minimise watercourse crossings and potential impacts to the water environment, especially on steep ground to the south of the proposal. All watercourse crossings should be designed to accommodate the 1 in 200 year event plus climate change, and other infrastructure should be located well away from watercourses. All watercourse crossings must be designed as traditional style bridges or bottomless arched culverts.
- 1.6 We would expect floating tracks for any areas of peat exceeding a depth of 1m. Floating tracks would mitigate against impacts on peat as well as the hydrological impacts of any Ground Water Dependent Terrestrial Ecosystems (GWDTE) and we would therefore like to see floated tracks throughout the whole development unless proven technically infeasible. All tracks should be kept a minimum 10m away from any waterbody, with the exception of watercourse crossings. We would expect the 10m buffer to be shown on a site plan to confirm that this buffer is maintained and that no construction works occur within this buffer.
- 1.7 We will expect the layout to avoid GWDTE and sensitive wetlands which are identified through a National Vegetation Classification (NVC) survey. Therefore, 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 must be submitted.
- 1.8 Both the peat and NVC surveys should have all proposed infrastructure overlaid and clearly demonstrate how the proposals have located infrastructure away from deep peat (>1m) and avoided GWDTE and sensitive wetland habitats. We would encourage drafts of these surveys to be submitted for early consideration and discussion prior to formal submission to the Planning Authority.

- 1.9 The layout must ensure a separation distance of 50m between turbines and water bodies. While not submitted with this consultation, we did note previously from material provided during the Major Pre-application meeting on 9 September 2019 that a buffer was provided on a site plan, however it was not presented at a scale which clearly demonstrated avoidance had been achieved. There are multiple locations of concern, and a more appropriate scaled site plan should be submitted.
- 1.10 If battery storage is pursued, please include an indicative layout plan showing the location, design and scale of the facility. Information should be provided on the environmental risks associated with the facility (i.e. risk of battery acid leaks) and mitigation provided, such as bunding and appropriate drainage.
- 1.11 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.

Regulatory advice for the applicant

2. Regulatory requirements

- 2.1 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).
- 2.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.
- 2.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:
 - is more than 4 hectares,
 - is in excess of 5km, or
 - includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°

See SEPA's <u>Sector Specific Guidance: Construction Sites (WAT-SG-75)</u> for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

- 2.4 Below these thresholds you will need to comply with <u>CAR General Binding Rule 10</u> which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.
- 2.5 Details of regulatory requirements and good practice advice for the applicant can be found on the <u>Regulations section</u> of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at: Graesser House, Fodderty Way, Dingwall Business Park, Dingwall IV15 9XB Tel: 01349 862021.

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

Yours sincerely

Aden McCorkell

Part time Senior/Planning Officer Planning Service

ECopy to: Magnus. Hughson@gov.scot

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, 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 website planning pages.

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

3. Site layout

3.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail <u>all</u> proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. 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.

4. Engineering activities which may have adverse effects on the water environment

- 4.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:
 - a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
 - b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.
 - c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.
- 4.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.
- 4.3 Further advice and our best practice guidance are available within the water <u>engineering</u> section of our website. Guidance on the design of water crossings can be found in our <u>Construction of River Crossings Good Practice Guide</u>.
- 4.4 Refer to Appendix 2 of our <u>Standing Advice</u> for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. 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. Our <u>Technical flood risk guidance for stakeholders</u> outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to <u>Controlled Activities Regulations (CAR)</u> Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.

5. Disturbance and re-use of excavated peat and other carbon rich soils

- 5.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments must aim to minimise this release."
- 5.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.

5.3 The submission must include:

- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's <u>Guidance on Developments on Peatland Peatland Survey (2017)</u>) 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.
- 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 peat to be re-used and how it will be kept wet permanently must be included.
- To avoid delay and potential objection proposals must be in accordance with <u>Guidance on the Assessment of Peat Volumes</u>, <u>Reuse of Excavated Peat and Minimisation of Waste</u> and our <u>Developments on Peat and Off-Site uses of Waste Peat</u>.
- 5.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.
- 5.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

6. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

- 6.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:
 - 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 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 boundary where the

- distances require it.
- b) If the minimum buffers above 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.
- 6.2 Please refer to <u>Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems</u> for further advice and the minimum information we require to be submitted.

7. Existing groundwater abstractions

- 7.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:
 - a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater 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 boundary where the distances require it.
 - b) If the minimum buffers above 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 existing groundwater abstractions affected.
- 7.2 Please refer to <u>Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems</u> for further advice on the minimum information we require to be submitted.

8. Forest removal and forest waste

- 8.1 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. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.
- 8.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:
 - a) A map demarcating the areas to be subject to different felling techniques.
 - b) Photography of general timber condition in each of these areas.
 - c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
 - d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in <u>Use of Trees Cleared to Facilitate Development on Afforested Land Joint Guidance from SEPA, SNH and FCS.</u>

9. Borrow pits

9.1 Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to

- address this policy statement.
- 9.2 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. The following information should also be submitted for each borrow pit:
 - a) A map showing the location, size, depths and dimensions.
 - b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
 - c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
 - d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
 - e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
 - f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
 - g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
 - h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's <u>Guidance on Developments on Peatland Peatland Survey (2017)</u>) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂.
 - i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
 - j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

10. Pollution prevention and environmental management

10.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to Guidance for Pollution Prevention (GPPs).

11. Life extension, repowering and decommissioning

- 11.1 Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with <u>SEPA Guidance on the life extension and decommissioning of onshore wind farms</u>. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.
- 11.2 The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document <u>Is it waste Understanding the definition of waste.</u>



By email to: Econsents_Amin@gov.scot

Your ref: **ECU00002025** Our ref: **CDM158571**

18 March 2020

For the attention of: Magnus Hughson

Dear Mr Hughson,

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION
FOR CORRIEGARTH 2 WIND FARM

Thank you for your consultation dated 28 February 2020 on the scope of the Environmental Impact Assessment (EIA) for the proposed extension to Corriegarth Wind Farm.

General Scoping Advice

In addition to the specific comments below, the applicant should refer to our 'general scoping and pre-application advice' note, which can be found via

https://www.nature.scot/sites/default/files/2018-02/SNH%20General%20pre-application%20and%20scoping%20advice%20%20to%20developers%20of%20onshore%20wind%20farms.pdf

This provides guidance on the issues that developers and their consultants should consider for wind farm developments and includes information on recommended survey methods, sources of further information and guidance and data presentation. Attention should be given to the full range of advice included in the guidance note. The checklist in Annex 1 sets out our expectations of what should be included in the EIA report.

Landscape and Visual Impacts

The proposal is located is located within 5 km of Wild Land Area (WLA) 20 Monadhliath. We welcome the proposal within the scoping report to undertake a wild land assessment as part of the Environmental Impact Assessment (EIA). We advise the applicant to contact us to discuss the scope of their wild land assessment including an appropriate study area. This is to ensure that any impact on the qualities of this WLA, as identified in the relevant published

Scottish Natural Heritage, The Links, Golspie Business Park, Golspie, KW10 6UB Tel: 0300 0676841 Fax: 01408 634222 www.nature.scot

description¹, are properly assessed both for this proposal on its own and cumulatively with other wind energy developments. The importance of impacts experienced from **within** the WLA will be key considerations in this assessment.

The wild land assessment should follow the new draft 2017 guidance². The 2017 draft guidance sets out a methodology and general principles for assessing the impact of proposals on Wild Land Areas identified on the 2014 SNH WLA map, drawing on the published descriptions. In order to support Scottish Planning Policy, now that WLAs have been identified and their qualities defined, it will be appropriate for the developers to apply the 2017 draft guidance in place of the 2007 Assessing the impacts on wild land: interim guidance note for this assessment. We encourage the applicant to discuss the scope of the assessment with us.

As the proposed turbines are below 150m then it is unlikely that they will require aviation lighting. However should this situation change at any point then we advise that a night-time lighting assessment should be undertaken for the WLA. We would welcome further discussion on the scope of this with the applicant if such an assessment is required.

The proposal may raise issues of national importance and we may therefore object to the principle of wind farm development in this location. Our advice on any subsequent formal planning application will, however, take full account of the final proposal and information presented in an EIA report as well as the cumulative situation at the time of submission. We will also take account of wider public interests.

Ornithology

As this proposal is located within Natural Heritage Zone (NHZ) 10 then there is high potential For golden eagles to be affected. We welcome further assessment of any impacts of this proposal on golden eagle within the EIA report. In addition to this, we highlight to the applicant that should this proposal be consented then we would advise on a further contribution to the Regional Eagle Conservation Management Plan (RECMP).

The scoping report has identified the proposal as having connectivity with the River Spey-Insh Marches Special Protection Area (SPA) designated for raptors and wildfowl. We welcome the proposal to undertake a detailed assessment of potential impacts on the SPA species within the EIA report.

Protected Species

We welcome the proposed surveys for bats, otter, water vole, red squirrel, badger and pine marten and wildcat. If any of these species are identified then we advise that a Species Protection Plan should be included with the EIA report

Peatland Advice

Carbon Rich Soils, Deep Peat and Priority Peatland Habitat

The proposed development boundary includes areas of carbon rich soils, deep peat and priority peatland habitat including areas identified as class 1 and 2 on the Carbon and Peatland 2016 map available from http://map.environment.gov.scot/Soil_maps/?layer=10

¹ For Wild Land Area 20, see: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Monadhliath-July-2016-20.pdf

² See: https://www.nature.scot/professional-advice/landscape-change/landscape-policy-and-guidance/assessing-impacts-wild-land-areas-draft-guidance.

Class 1 and 2 areas are considered to be nationally important carbon-rich soils, deep peat and priority peatland habitat, areas likely to be of high conservation value or areas of potentially high conservation value and restoration potential. These areas are afforded significant protection under Scottish Planning Policy.

We consider that it may be possible to build a wind farm of the scale proposed without significant effects on deep peat and priority peatland habitat. The EIA report will need to address, in detail, how a wind farm can be constructed without compromising this national interest. Opportunities to mitigate impacts through siting, design and other measures should be fully considered. This may include options for significant habitat restoration to mitigate any loss and damage to this peatland interest. We may object to this proposal if it does not demonstrate that any significant effects on the qualities of these peatland areas overcome for siting, design and mitigation.

<u>Peat Management Plan, Construction Environmental Management Plan and Habitat Management Plan</u>

We welcome the commitment to a Peat Management Plan and Construction Environmental Management Plan. We note there are no proposals for a Habitat Management Plan (HMP) and we advise that a HMP will be required, particularly to ensure that there is no overall loss of peatland habitat or the services that delivers, but also to take account of other habitats subject to loss and damage. The plan should clearly demonstrate that any impacts on peatland habitats can be substantially overcome and that there will be no overall loss of peatland habitat or the services that peatland delivers. The plan should also take into account other habitats subject to loss and damage from the proposal..

Deer Management

If wild deer are present on or will use the development site, an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (e.g. access and recreation, road safety, etc.) should be presented with in the EIA report. Where significant impacts may be caused, a draft deer management statement will also be required to address the impacts. Please refer to our guidance " What to consider and include in deer assessments and management at development sites," available via the following link: <a href="https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm

Appropriate deer management will be vital in ensuring habitat restoration is successful and we advise that this should be referenced within the Habitat Management Plan.

We would encourage the applicant, in line with The Code of Practice on Deer Management available from, https://www.nature.scot/professional-advice/land-sea-management/managing-wildlife/managing-deer/code-practice-deer, to collaborate with neighbours and other interested parties, as well as the Monadhliaths Deer Management Group during the assessment and any subsequent management. If a Deer Management Statement is produced then it should comply with the Best Practice Guidance on Deer Management Plans which is available from

http://www.bestpracticeguides.org.uk/planning/dmps

Decommissioning and Redevelopment

The EIA process should consider the implications of decommissioning and redevelopment of wind farm sites, and assess the likely impacts of both. Guidance on decommissioning can be

found on our website via https://www.nature.scot/guidance-decommissioning-and-restoration-plans-wind-farms-february-2016.

The Decommissioning and Restoration Plan (DRP) presented in the EIA report should be brief but provide an appropriate level of detail about how the site infrastructure may be removed and how the site is intended to be restored. The DRP should be revised 3-5 years prior to the year of decommissioning, to provide full details of decommissioning and restoration for approval by the Planning Authority. This is because environmental conditions, laws and techniques may change during the operational lifetime of a scheme. Further survey work may be required to inform the final decommissioning plan. As a guide, the final decommissioning plan should contain a similar level of detail to a Construction and Environmental Management Plan.

Restoration should include the removal of new tracks and restoration of existing tracks to their pre-wind farm width during the decommissioning process, to return the site to the same or better state than pre-construction. However, we recognise that there could be situations where retention of some tracks might be beneficial (e.g. for access and recreation where they provide links to important routes, where removal may cause damage to important natural heritage interests, etc.). The pros and cons of track removal/retention for each individual site can be considered more fully in the 3-5 years prior to a decision being taken on decommissioning. This should be done in consultation with the Planning Authority (and SNH and SEPA, as appropriate).

Concluding Remarks

Please note that while we are supportive of the principle of renewable energy, this advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

I hope you find these comments helpful. Should you wish to discuss this response then please don't hesitate to contact me using contact details below or by email at Debbie.skinner@nature.scot

Yours sincerely,

Debbie Skinner Area Officer - Highland

Hughson M (Magnus)

From: Helene Mauchlen <helene.mauchlen@bhs.org.uk>

 Sent:
 15 April 2020 14:41

 To:
 Hughson M (Magnus)

Subject: RE: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear Magnus

Apologies for being late in responding to this scoping report, the BHS has no comment to make except our usual plea that off road access is preserved and if possible extended during this development.

Thank you for consulting

Helene

Helene Mauchlen National Manager for Scotland

The British Horse Society

Woodburn Farm, Crieff Perthshire PH7 3RG

Telephone: 02476 840727

Email: <u>helene.mauchlen@bhs.org.uk</u>

Website: www.bhs.org.uk/scotland www.bhsscotland.org.uk

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From: Magnus.Hughson@gov.scot < Magnus.Hughson@gov.scot >

Sent: 28 February 2020 12:14 **To:** Econsents Admin@gov.scot

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear consultee,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CORRIEGARTH 2 WIND FARM

On 17 February 2020, Corriegarth 2 Windfarm Limited (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for Corriegarth 2 Wind Farm. The proposed development is for a wind farm of 18 turbines with a maximum tip height of 149.9 m,

and ancillary infrastructure, located in the planning authority area of the Highland Council in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and associated figures can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on Simple Search tab; then,
- typing Corriegarth 2 Wind Farm into Search by Project Name box then clicking on Go;
- then clicking on **ECU00002025** and then click on **Documents** tab.

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site specific information.

I would be grateful for your comments by **Friday 20 March**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to <u>Econsents Admin@gov.scot</u> and copy directly to my email address.

Regards,

Magnus Hughson

The Scottish Government Energy Consents Unit 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU. 0131 244 1252

From: Magnus.Hughson@gov.scot < Magnus.Hughson@gov.scot >

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Regards,

Magnus Hughson

The Scottish Government Energy Consents Unit 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU. 0131 244 1252

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Melrose J (Joyce)

From: paul.d2.jackson@bt.com
Sent: 05 March 2020 16:32

To: Hughson M (Magnus); Econsents Admin

Subject: RE: Section 36 - Corriegarth 2 Wind Farm - scoping



OUR REF; WID11159

Dear Sir/Madam

Thank you for your email dated 28/02/2020.

We have studied this Windfarm proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.

Regards

Paul Jackson

Engineering Services – Radio Planner (UK North)

BT Technology

Office: 01943 468084 Mobile: 0774 073 9902

Email: paul.d2.jackson@bt.com



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From: Magnus.Hughson@gov.scot [mailto:Magnus.Hughson@gov.scot]

Sent: 28 February 2020 12:14 **To:** Econsents_Admin@gov.scot

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear consultee,

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THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
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I would be grateful for your comments by **Friday 20 March**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to <u>Econsents Admin@gov.scot</u> and copy directly to my email address.

Regards,

Magnus Hughson

The Scottish Government
Energy Consents Unit
5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU.
0131 244 1252

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Jill Roberts
Assistant Safeguarding Manager
Ministry of Defence
Safeguarding – Wind Energy
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Telephone [MOD]: 07929056607

E-mail: Jillian.roberts156@mod.gov.uk

Magnus Hughson Energy Consents Unit Scottish Government 4th Floor 5 Atlantic Quay 150 Broomielaw G2 8LU Scotland

24 March 2020

Dear Magnus

Please quote in any correspondence: DIO18604

Site Name: Corriegarth 2 Wind Farm

Proposal: Erection of 18 Turbines at 149.9 meters to blade tip

Planning Application Number: ECU00002025

Thank you for consulting the Ministry of Defence (MOD) on the above Section 36 scoping opinion in your communication dated 28 February 2020.

I am writing to tell you that the MOD has no concerns to this proposal.

The application is for 18 turbines at 149.9 metres to blade tip. This has been assessed using the grid references below as submitted in the planning application or in the developers' or your pro-forma

| Turbine | Easting | Northing |
|---------|---------|----------|
| 1 | 255,809 | 812,767 |
| 2 | 258,687 | 812,718 |
| 3 | 256,318 | 812,159 |
| 4 | 256,920 | 812,093 |
| 5 | 257,587 | 812,170 |
| 6 | 258,257 | 812,170 |
| 7 | 259,113 | 812,975 |
| 8 | 259,312 | 813,432 |
| 9 | 259,218 | 814,098 |
| 10 | 258,536 | 814,382 |
| 11 | 258,174 | 814,812 |
| 12 | 257,481 | 814,717 |
| 13 | 257,859 | 814,334 |
| 14 | 257,171 | 814,145 |
| 15 | 256,711 | 814,420 |

| 16 | 255,970 | 814,224 |
|----|---------|---------|
| 17 | 256,195 | 813,867 |
| 18 | 255,781 | 813,295 |

In the interests of air safety, the MOD will request that the development should be fitted with MOD accredited aviation safety lighting. The cardinal turbines should be fitted with 25 candela omni-directional red lighting and infrared lighting Combi with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration. The remainder perimeter turbines should be fitted with 25 candela omni-directional or Infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration.

The principal safeguarding concern of the MOD with respect to the development of wind turbines relates to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

If planning permission is granted, we would like to be advised of the following prior to commencement of construction;

- the date construction starts and ends:
- the maximum height of construction equipment;
- the latitude and longitude of every turbine.

This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area.

If the application is altered in any way we must be consulted again as even the slightest change could unacceptably affect us.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding

Yours sincerely

Jill Roberts Assistant Safeguarding Manager – Wind Energy Defence Infrastructure Organisation

Hughson M (Magnus)

From: Safeguarding <Safeguarding@hial.co.uk>

Sent:25 March 2020 15:23To:Hughson M (Magnus)Cc:Econsents Admin

Subject: RE: Section 36 - Corriegarth 2 Wind Farm - scoping

Sincere apologies for the late response, please can HIAL submit the response below.

Your Ref: ECU00002025 **HIAL Ref:** 2020/0062/INV

Dear Sir/Madam,

PROPOSAL: THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CORRIEGARTH 2 WIND FARM

LOCATION: 15km NE of Fort Augustus, 10km SE of Foyers

This development falls inside the safeguarded areas for **Inverness Airport** (as defined in CAP 764 – CAA Policy and Guidelines on Wind Turbines and CAP 670 - Air Traffic Services Safety Requirements).

The turbines could possibly affect the instrument flight procedures and performance of electronic aeronautical systems for the airport. HIAL would not wish to see a degradation of any of these services, particularly the Radar installation.

It should be noted that HIAL would work with the developer towards a resolution. However, HIAL are likely to **object** any proposal which impacts on the Instrument Flight Procedures or Navigation Aids (e.g. Radar), unless a solution can be found to mitigate the effect on Inverness Airport's operation.

Regards,

Safeguarding Team

From: Magnus. Hughson@gov.scot < Magnus. Hughson@gov.scot >

Sent: 28 February 2020 12:14 **To:** Econsents_Admin@gov.scot

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear consultee,

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Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

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- then clicking on **ECU00002025** and then click on **Documents** tab.

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site specific information.

I would be grateful for your comments by **Friday 20 March**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to <u>Econsents_Admin@gov.scot_</u> and copy directly to my email address.

Regards,

Magnus Hughson

The Scottish Government Energy Consents Unit 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU. 0131 244 1252

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Hughson M (Magnus)

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>

 Sent:
 05 March 2020 09:49

 To:
 Hughson M (Magnus)

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping [WF578718]

Dear magnus,

A Windfarms Team member has replied to your coordination request, reference **WF578718** with the following response:

Dear Magnus, Many thanks for sending over that info, please see below for clearance:

Planning Ref:

Section 36

Name/Location:

Corriegarth 2 Wind Farm

Site Centre/Turbine at NGR:

T1 - 255809 812767

T2 - 258687 812718

T3 - 256318 812159

T4 - 256920 812093

T5 - 257587 812170

T6 - 258257 812466

T7 - 259113 812975

T8 - 259312 813432

T9 - 259218 814098

T10 - 258536 814382

T11 - 258174 814812

T12 - 257481 814717

T13 - 257859 814334

T14 - 257171 814145

T15 - 256711 814420

T16 - 255970 814224

T17 - 256195 813867

T18 - 255781 813295

Development Radius:

0.1km

Hub Height: 82m Rotor Radius: 68m

This proposal cleared with respect to radio link infrastructure operated by:

The local utility and Scotia Gas Networks

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

The Joint Radio Company Limited Delta House 175-177 Borough High Street LONDON SE1 1HR United Kingdom

Office: 020 7706 5199

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

http://www.jrc.co.uk/about-us

JRC is working towards GDPR compliance. We maintain your personal contact details in accordance with GDPR requirements for the purpose of "Legitimate Interest" for communication with you. However you have the right to be removed from our contact database. If you would like to be removed, please contact anita.lad@jrc.co.uk.

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

https://breeze.jrc.co.uk/tickets/view.php?auth=o1xgadaaahfjeaaaGFrfJ1B0Wc1ccw%3D%3D

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By email to: Econsents Admin@gov.scot

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

2 March 2020

Dear Sir/Madam

Corriegarth 2 Wind Farm: Environmental Impact Assessment Scoping Report

ECU reference: ECU00002025

BayWa r.e. UK Limited has submitted an EIA Scoping Report for a potential wind farm at Corriegarth in the western Monadhliath. The indicative scoping layout shows 18 turbines of 149.9m blade-tip height. The indicative layout shows the proposed turbines ringing the existing 23 turbines of 120m BTH.

Mountaineering Scotland is a membership organisation with over 14,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains, and acts to represent, support and promote Scotlish mountaineering. Mountaineering Scotland also acts on behalf of the 85,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Mountaineering Scotland did not object to the applications that resulted in the current wind farm. Subsequent observation in the field suggests that the highest turbines – those added in the final application that consented the wind farm as built – have a disproportionately adverse visual impact because of their elevation and sightlines from the eastern Monadhliath Munros.

Assessment

Mountaineering Scotland has reviewed the Scoping Report from the perspective of its members' interests and has the following observations.

- 1. We have no comment on the bulk of the Scoping Report.
- 2. We have concerns that additional high-altitude, and taller, turbines would increase the adverse impact of the existing highest elevation turbines. We would hope that this will influence the design process and expect any effect to be fully dealt with in the LVIA.





- 3. We concur with the proposed upland viewpoints, viz: 6, 9, 11, 13, 14, and 15. However, we find it odd that the second-highest summit in the western Monadhliath, which lies within 1km of the highest altitude turbine on the indicative layout, is not proposed as a viewpoint. Carn na Saobhaidhe, at 811m, is a Corbett and thus a point of attraction for hill-walkers. We suggest its inclusion as a viewpoint.
- 4. We agree that a full wild land assessment is required for the Monadhliath WLA, which the proposed development abuts.

Yours sincerely

Davie Black Access & Conservation Officer Mountaineering Scotland

T: 07555 769325

E: access@mountaineering.scot



Melrose J (Joyce)

NATS Safeguarding < NATSSafeguarding@nats.co.uk > From:

02 March 2020 12:07 Sent: To: Hughson M (Magnus)

Cc: Econsents Admin; NATS Safeguarding

Subject: RE: Section 36 - Corriegarth 2 Wind Farm - scoping (SG29451)

Dear Mangus

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley, Fareham, Hants PO15 7FL www.nats.co.uk









From: Magnus. Hughson@gov.scot < Magnus. Hughson@gov.scot >

Sent: 28 February 2020 12:14 To: Econsents Admin@gov.scot

Subject: Section 36 - Corriegarth 2 Wind Farm - scoping

Dear consultee,

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) **REGULATIONS 2017** REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CORRIEGARTH 2 WIND FARM

On 17 February 2020, Corriegarth 2 Windfarm Limited (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for Corriegarth 2 Wind Farm. The proposed development is for a wind farm of 18 turbines with a maximum tip height of 149.9 m, and ancillary infrastructure, located in the planning authority area of the Highland Council in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and associated figures can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on Search tab; then,
- clicking on Simple Search tab; then,
- typing Corriegarth 2 Wind Farm into Search by Project Name box then clicking on Go;
- then clicking on **ECU00002025** and then click on **Documents** tab.

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site specific information.

I would be grateful for your comments by **Friday 20 March**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to <u>Econsents Admin@gov.scot</u> and copy directly to my email address.

Regards,

Magnus Hughson

The Scottish Government
Energy Consents Unit
5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU.
0131 244 1252

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By email: Econsents Admin@gov.scot Cc: Magnus.Hughson@gov.scot

26 March 2020

Dear Magnus

Your Ref: **ECU00002025**

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CORRIEGARTH 2 WIND FARM

Thank you for consulting RSPB Scotland on the above scoping report and allowing additional time for us to respond.

This proposal has the potential to adversely impact on golden eagles within NHZ10 and other Annex 1 species including raptors and waders. As well as impacting on areas of peatland and associated specialist invertebrate and plant species. These issues must be fully assessed in the EIA.

Baseline survey methods and desk based study

Detailed information on golden eagle territories in NHZ10 is available from Highland Raptor Study Group. Satellite tagging information on usage of the area by immature and adult birds may also be available from Natural Research. As well as collision risk, the impact on loss of available foraging area through direct habitat loss and/or displacement effects for any territories that overlap with the windfarm footprint must also be assessed within the EIA (and should be considered in any assessment of cumulative impacts with other developments). SNH should be able to advise on the most appropriate model to use for this assessment.

Habitat loss and displacement effects should also be assessed for other species of conservation concern, particularly breeding waders that may be particularly susceptible to displacement. A Habitat Management Plan will be required to ensure suitable good quality habitat is managed/created elsewhere.

RSPB Scotland can provide recent data on the River Spey - Insh Marshes SPA via a data request to inform an assessment of impacts.

Peat

The area within the site boundary is likely to include areas of deep peat and priority peatland habitat. In addition to providing unique habitat, peat is an excellent carbon store and is crucial in meeting our climate change targets.

Policy 55 of the Highland Wide LDP states "Development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils.

North Scotland Tel 01463 715000 Fax 01408 715315 Office **Etive House**

Beechwood Park Inverness

IV2 3BW rspb.org.uk BirdLife

The RSPB is part of BirdLife Internation a partnership of conservation organisation working to give nature a home around the working to give nature at home around the working the same at his same at his

Unacceptable disturbance of peat will not be permitted unless it is shown that the adverse effects of such disturbance are clearly outweighed by social, environmental or economic benefits arising from the development proposal".

The EIA needs to demonstrate how the site design has avoided any areas of deep peat or priority habitat. Following this assessment of impacts, options for on- and off-site peatland restoration should be included in a HMP.

Cumulative Impacts

Impact assessments should not be restricted just to windfarms but include all development, forestry or recreational pressures that may have an impact on the habitats or species affected. SNH has recently updated guidance on assessing the cumulative impacts of onshore wind farms on birds¹

If you would like to discuss further, please do not hesitate to contact me.

Yours sincerely

Claire Smith
Senior Conservation Officer
claire.b.smith@rspb.org.uk

¹ https://www.nature.scot/sites/default/files/2018-08/Guidance%20-%20Assessing%20the%20cumulative%20impacts%20of%20onshore%20wind%20farms%20on%20birds.pdf



10th March 2020

Energy Consents Unit 5 Atlantic Quay 150 Broomielaw Glasgow G2 8LU Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

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

Dear Magnus Hughson

IV2 Highland Corriegarth 2 Wind Farm Site At PLANNING APPLICATION NUMBER: ECU00002025

OUR REFERENCE: 789618

PROPOSAL: Wind Farm (Generating station of >100 <200 MW Capacity)

Please quote our reference in all future correspondence

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:

Water

 Unfortunately, according to our records there is no public Scottish Water, Water infrastructure within the vicinity of this proposed development therefore we would advise applicant to investigate private options.

Foul

 Unfortunately, according to our records there is no public Scottish Water, Waste Water infrastructure within the vicinity of this proposed development therefore we would advise applicant to investigate private treatment options.

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 taking account of various factors including legal, physical, and technical challenges. However it may still be deemed that a combined connection will not be accepted. Greenfield sites will not be considered and a connection to the combined network will be refused.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, 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 all of our application forms on our website at the following link https://www.scottishwater.co.uk/business/connections/connecting-your-property/new-development-process-and-applications-forms

Next Steps:

• Single Property/Less than 10 dwellings

For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.

10 or more domestic dwellings:

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water 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 up 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 or not the discharge from your premises is likely to be considered 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 using the following link https://www.scottishwater.co.uk/business/our-services/compliance/trade-effluent/trade-effluent-documents/trade-effluent-notice-form-h

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

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk.

Yours sincerely

Pamela Strachan

Planning Consultations Administrator



CORRIEGARTH 2 WIND FARM GATECHECK REPORT

JULY 2020





Prepared By:

Arcus Consultancy Services

7th Floor 144 West George Street Glasgow G2 2HG

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Registered in England & Wales No. 5644976



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1 INTRODUCTION

This Gatecheck Report (the Report) has been prepared by Arcus Consultancy Services Ltd (Arcus) on behalf of Corriegarth 2 Windfarm Limited¹ (the Applicant). The Applicant is proposing to submit an application to the Scottish Government's Energy Consents Unit (ECU) under Section 36 of the Electricity Act 1989² to construct and operate the Corriegarth 2 Wind Farm on land approximately 15 kilometres (km) north east of Fort Augustus and 10 km south east of Foyers (the Development).

The Report sets out the information required by the ECU to undertake a gatecheck for the Development in compliance with the gatecheck procedure³ as outlined by the ECU.

The purpose of this Report is to describe how the design of the Development has evolved since the pre-scoping stage; highlighting influencing factors on the design either as a response to environmental constraints identified during the Environmental Impact Assessment (EIA) process or through consultation feedback from statutory or non-statutory consultees.

The Report sets out the following in line with the ECU gate-checking procedure:

- Description of the design evolution, highlighting key iterations;
- Interactions with statutory and non-statutory consultees during the EIA process, with a focus on the scoping comments and how these have been addressed;
- Description of community engagement undertaken to date; and
- Details of the forthcoming application including a timeline for submission, advertisement requirements, and proposed locations for the application to be publicly viewed (if applicable in light of COVID-19 restrictions).

July 2020

¹ Corriegarth 2 Windfarm Limited is wholly owned by BayWa r.e. UK Limited

² UK Government, 1989, Electricity Act 1989 [Online] Available at: http://www.legislation.gov.uk/ukpga/1989/29/contents (Accessed 08/05/2020)

³ Scottish Government, Gate-checking process for section 36 and section 37 applications [Online] Available at https://www.gov.scot/Topics/Business-Industry/Energy/Infrastructure/Energy-Consents/Guidance/Gatecheckingprocessforsection36andsection37applica (Accessed 08/05/2020)



2 DESIGN OF THE DEVELOPMENT

2.1 The Site and Surrounding Area

The Development will involve the construction and operation of a wind farm on an area of land centred on National Grid Reference (NGR) 256250, 814340 and located south east of Loch Ness and approximately 15 km north-east of Fort Augustus (the Site). The Site covers an area of approximately 1,700 hectares (ha) with the extent and location shown on Figure 1. The Site is entirely located within the administrative boundary of The Highland Council (the Council).

The topography of the Site and immediate vicinity is complex and largely consist of rural upland farmland used for grazing and grouse shooting. The Site itself varies significantly in elevation ranging from approximately 550 - 720 m Above Ordnance Datum (AOD) in the central part of the Site, which is within the operational Corriegarth Wind Farm, before sloping west along the access track towards the B862, with elevations reducing to approximately 200 m AOD. There are a number of hilltops bordering the Site boundary, with only one named summit located within the Site; Carn na Saobhaidhe in the west (603 m AOD).

The Site lies within the catchments of the River E, which flows east to west across the Site and rises in the south east of the Site before discharging into Loch Mhor (also known as Loch Garth). The Allt Bad Fionnaich and Allt a' Ghille Charaic tributaries of the River E rise approximately 800 m and 900 m east of the Site boundary respectively and join River E at the south west boundary of the Site.

Access to the Site is afforded from an unclassified road and access tracks running from the B862 to the northwest of the Site, passing Corriegarth Lodge and broadly following the alignment of the River E on a north west to south east alignment.

The nearest settlements are Whitebridge, located approximately 5 km west of the Site, and Stratherrick, located approximately 5 km north of the Development. The closest residential property is located at Garrogie Lodge, situated approximately 3.5 km south west of the closest indicative turbine location. There are also a number of residential properties, such as Corriegarth Lodge, located along the B862 to the west of the Site; however, these properties are just outwith the Site boundary.

2.2 Design Evolution

The final layout will be presented in the EIA Report and has been the subject of a number of iterations and refinements to mitigate by design predicted adverse effects as far as reasonably practicable. The final proposal will balance the environmental and technical constraints, whilst producing an economically viable project. Design changes made as a consequence of the key constraints are considered to be mitigation which is 'embedded' in the design.

The key iterations, to date, are described below and demonstrate how the layout has evolved throughout the EIA process.

2.2.1 Pre-Application - October 2019 - 20 Turbines - Tip Height 179.9 m

This 20 turbine initial layout was presented to the Council at the pre-application meeting on 9th October 2019. This layout maximised potential turbine numbers reflective of known constraints at the time, which were not necessarily subject to detailed site work. The principle constraints during pre-application included the avoidance of known designations (i.e. 50 m buffers around watercourses and avoidance of areas of steep terrain) whilst ensuring suitable separation distances between the turbines to prevent issues associated with turbulence.



At this time, initial consideration was given to the cumulative visibility of the turbines with the operational Corriegarth Wind Farm. The result of taking these constraints into account was a pre-application layout (Figure 2) that maximised potential turbine numbers and height using all unconstrained land established during the feasibility study. represented the largest potential wind farm within the Site of 20 turbines with a tip height of 179.9 m while adhering to all constraints known at the time.

2.2.2 Scoping Layout - February 2020 - 18 Turbines - Tip Height 149.9 m

Between the pre-application and scoping layouts, the biggest layout change was the reduction in turbine numbers and tip height as a result of designing a visually cohesive scheme with consideration for landscape visibility.

In particular the decision was taken to drop the turbine height below 150m in order to avoid the requirement for medium intensity (2000 candela), visible, red aviation lighting of the turbines and reduce the height difference in comparison to the existing turbines.

The scoping layout (shown on Figure 3) was formulated in February 2020 and consisted of 18 turbines with a tip height of up to 149.9 m. The layout was based on 5 x 3 rotor spacing requirements, a prevailing wind of south west (approximately 225 degrees), and the turbines positioned to avoid immediately apparent constraints (such as 50 m watercourse buffers).

The Development was scoped under the EIA Regulations, and a Scoping Opinion was received from the Scottish Government on the 27th April 2020 (Energy Consents Unit Reference: ECU00002025).

2.2.3 Chilled Layout - May 2020 - 17 Turbines - Tip Height 149.9 m

The chilled layout consists of 17 turbines at a height of 149.9 m and represents a further reduction in the number of turbines from the previous scoping layout. The layout was based on 6 x 4 rotor spacing requirements, a prevailing south-west wind (approximately 225 degrees), and the turbines positioned to avoid onsite constraints, including areas of deep peat (based on Phase 1 peat depth survey results) and watercourses; additionally, the layout also takes account of key landscape and visual considerations, including potential views experienced from nearby key receptors.

A number of iterations took place between the scoping layout and the chilled turbine layout, taking into account the constraints identified during environmental surveys. In addition, comments from consultees, in particular in terms of landscape and visual, provided key elements of the overarching design strategy.

Following detailed wind data analysis, it was determined that greater spacing between the turbines was required; this was achieved by respecting the onsite constraints and dropping one turbine.

The chilled turbine layout incorporates infrastructure elements not present on the scoping layout, including a preliminary access track layout, though design work is ongoing. The Site contains an existing high-quality access tracks associated with the operational Corriegarth Wind Farm, and reusing existing infrastructure, wherever possible, has been a key design criterion.

The following environmental factors have been key drivers affecting the design following survey work which was conducted to establish an accurate baseline of the receiving environment.

The chilled layout is provided on Figure 4, noting that design work is ongoing and further revisions to this layout may be required following detailed Phase 2 peat surveys.



Phase 1 Peat Surveys

Following Phase 1 peat depth surveys, it was established that the majority of the Site is underlain by peat, with extensive areas of deep peat. Peat depth information is a principal consideration in the design process and the chilled turbine layout avoids deep peat, where possible, noting that further refinements are likely following the results of more detailed Phase 2 peat surveys.

Ecological Receptors

Extensive ecological surveys undertaken across the Site generally recorded few protected species or sensitive habitats. The Site is dominated by peatland habitat including blanket bog, wet heath, and wet modified bog; however, surveys identified that the majority of these habitats are degraded. The primary ecological concern on site is the presence of potential Groundwater Dependant Terrestrial Ecosystems (GWDTEs); the chilled layout considers ecological constraints with turbines located a suitable distance away from these habitats.

Although protected species were recorded, including low levels of bat activity and the presence of badger and otter resting areas (likely associated with the Ness Woods Special Area of Conservation (SAC) otter population), no notable ecological sensitivities that cannot be avoided or appropriately mitigated have been recorded.

Good practice has been adopted to avoid disturbance to protected species or direct effects on sensitive habitats.

Ornithological Receptors

During pre-scoping consultation, it was agreed with Scottish Natural Heritage (SNH) that a combination of new ornithology baseline surveys in 2019, combined with post-construction monitoring data from the Operational Corriegarth Wind Farm collected since 2015 was sufficient to be able to determine species present and patterns of distribution, to inform the impact assessment. These surveys recorded a number of species of higher conservation concern, primarily raptors, within the Site and wider survey area. The design process for the chilled layout has made efforts to consider ornithological receptors by avoiding at sufficient distance, the locations of key species' nest sites and take into consideration any associated spatial patterns of foraging activity, to minimise the likelihood of disturbance-displacement and collision risk effects.

Hydrological Receptors

The Site has several watercourses running through it with the River E and tributaries in the south of the Site. The River E and its tributaries were carefully considered when designing the layout with infrastructure sited outwith 50 m watercourse buffers. Watercourse crossings were minimised, as much as possible, and any watercourse crossings will be in accordance with best practice and SEPA guidelines.

Landscape and Visual

Potential landscape and visual effects are a key consideration in the design process and formed a key focus of discussions with the Council following the scoping process. A design consultation meeting with the Council landscape architect and planning officer was held in April 2020, during which the evolution of the proposed turbine layout and a revised turbine layout was presented. The revised layout presented comprised 17 turbines of 149.9 m tip height and 133 m rotor diameter. This iteration of the layout design focused on improving layout composition and removing or minimising turbine visibility in key views. This layout was also presented to SNH in April 2020 as part of further consultation regarding the approach to the assessment of effects on Wild Land Area (WLA) 20: Monadhliath, during



which it was noted that this layout would result in very limited areas of additional visibility of wind turbines across WLA 20.

Several EIA team design workshops were undertaken which sought to eliminate any unacceptable landscape and visual impacts present in the preceding layouts. The criteria listed in the Highland Council Onshore Wind Energy Supplementary Guidance⁴ further informed the iterative design process, and key cumulative interactions with existing and proposed wind farm developments were considered throughout the evolution of the layout.

Key landscape and visual design objectives included the following:

- Create a balanced layout that responds to the scale and composition of the operational Corriegarth Wind Farm, avoiding overlapping and uneven spacing of turbines in key views toward the Site;
- Accommodate turbines within the broad topographical bowl occupied by the existing Corriegarth Wind Farm, avoiding areas of highest elevation along the ridgeline to the north-west of the Site; and
- Minimise the horizontal spread of the Development in key views towards the Site so
 as to minimise the opportunity for potential coalescence with clusters of existing and
 consented wind farm developments located to the north and south, on the western
 edge of the Monadhliath Mountains.

The design process also focused on views experienced by receptors at key viewpoint locations, including local hill summits such as Meall Fuar-mhonaidh, road routes and promoted viewpoints including General Wade's Military Road (B862) and recreational routes including the Great Glen Way and South Loch Ness Trail.

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⁴ The Highland Council (2017). Onshore Wind Energy Supplementary Guidance, November 2016 (with addendum, December 2017).



3 SCOPING AND CONSULTATION

3.1 Scoping

In line with Regulation 12 of the EIA Regulations, the Applicant sought a Scoping Opinion from the Scottish Ministers to confirm the scope of the required assessment which is to be provided in the EIA Report. A Scoping Report was submitted with the request for a Scoping Opinion in February 2020 which described the Development, identified potential environmental effects, and proposed a methodology to assess the environmental effects. The Scoping Report was issued to a list of statutory and non-statutory consultees as agreed with the ECU and listed in Table 1.

A Scoping Opinion was received by the ECU on 27th April 2020.

Table 1: Scoping Consultee List

| Table 1: Scoping Consultee List Consultee Response | Response Date | | | | |
|--|-------------------------------------|--|--|--|--|
| <u> </u> | | | | | |
| Statutory Consultees | | | | | |
| The Highland Council | 06/05/2020 | | | | |
| Scottish Environment Protection Agency (SEPA) | 19/03/2020 | | | | |
| Scottish Natural Heritage (SNH) | 18/03/2020 | | | | |
| Historic Environment Scotland (HES) | 18/03/2020 | | | | |
| Ness District Salmon Fisheries Board | No response | | | | |
| Non-Statutory Cons | ultees | | | | |
| British Telecommunications plc | 05/03/2020 | | | | |
| Cairngorms National Park Authority | 24/03/2020 | | | | |
| Civil Aviation Authority - Airspace | No response | | | | |
| Crown Estate Scotland | No response | | | | |
| Defence Infrastructure Organisation | 24/03/2020 | | | | |
| Fisheries Management Scotland | No response | | | | |
| Highlands and Islands Airports Ltd (HIAL) | 25/03/2020 | | | | |
| John Muir Trust | No Response | | | | |
| Joint Radio Company Limited | 05/03/2020 | | | | |
| Marine Scotland | 16/03/2020 | | | | |
| Mountaineering Scotland | 02/05/2020 | | | | |
| NATS Safeguarding (NATS) | 02/03/2020 | | | | |
| RSPB Scotland (RSPB) | 26/03/2020 | | | | |
| Scottish Forestry | 03/03/2020 | | | | |
| Scottish Rights of Way and Access Society (ScotWays) | No capacity to respond at this time | | | | |
| Scottish Water | 10/03/2020 | | | | |
| Scottish Wild Land Group | No response | | | | |
| Scottish Wildlife Trust | No response | | | | |
| Transport Scotland | 17/04/2020 | | | | |
| Visit Scotland | No response | | | | |
| Additional Consultees | | | | | |
| Stratherrick and Foyers Community Trust | No response | | | | |
| Findhorn District Salmon Fisheries Board | No response | | | | |
| Ness and Beauly Fisheries Trust | No response | | | | |
| British Horse Society | No response | | | | |

Appendix A presents a table of scoping consultation responses.



The Applicant has sought to address the comments raised in the Scoping Opinion and subsequently by individual consultees through the ongoing EIA and site design process.

The Scoping Opinion and responses were first considered by the project team and circulated to EIA contributors to be acted upon in the EIA process. Further discussions/consultations were held with consultees to ensure that their points are addressed effectively within the EIA process.

The scope of the EIA was revised, where required, to ensure that the specific comments could be accommodated as appropriate.

3.2 Community Engagement

Engagement with the local community has been a key element of the pre-application consultation exercise. Table 2 outlines the steps undertaken to keep the local community informed and involved with the process.

The COVID-19 pandemic has impeded the normal means of community engagement during 2020 to date. However, the Applicant developed alternative ways to engage with the local community, namely the 'Online Public Exhibition' as detailed in Table 2.

Table 2: Overview of Community Engagement to Date

| Date | Exercise |
|--------------------------------|---|
| 24 th February 2020 | Attendance at Stratherrick and Foyers Community Council (CC) Meeting. A brief presentation to the CC was given outlining the wind farm proposals and questions were taken from the CC members and members of the public who attended. |
| June 2020 | Public Exhibitions held: • Online at: https://www.baywa-re.co.uk/en/wind/corriegarth-2-windfarm/ (3 rd – 24 th June 2020) Following a request from Stratherrick & Foyers Community Council the exhibition was advertised via a letter drop to residents (approximately 355) within and around the settlements of Foyers, Whitebridge & Stratherrick. |

3.2.1 Online Public Exhibition

The 'online public exhibition', held online, provided an opportunity for engagement with the local community.

The public exhibition was hosted online due to the Scottish Government's COVID-19 advice and guidelines⁵. The Applicant originally planned to hold a public exhibition event in Stratherrick Hall in April 2020 however the exhibition materials were provided for inspection on the dedicated project webpage instead. The stated aims of the exhibition were to introduce the Applicant, inform the local community of the proposals for Corriegarth 2 Wind Farm and to receive feedback from the community. Information, including graphics and visualisations was provided in relation to the following:

- Project facts including maps of the windfarm location and layout;
- Information about the operational Corriegarth Wind Farm;
- The need for the Development:
- The application, determination and public consultation processes;
- Project Benefits; and

⁵ The Scottish Government (2020) Online Public Exhibition established in accordance with COVID-19 Scottish Government advice and regulations [Online] Available online at: https://www.gov.scot/publications/coronavirus-covid-19-planning-guidance-on-pre-application-consultations-for-public-events/ (Accessed 02/07/2020)



- EIA process including the key findings to date relating to:
 - Landscape and Visual Amenity including Zone of Theoretical Visibility (ZTV) and photomontages or wirelines from key viewpoints;
 - Ecology;
 - Ornithology;
 - Archaeology and Cultural Heritage;
 - Noise;
 - Traffic and Transport including a map showing the proposed route to Site;
 - Geology and Peat;
 - Socio-economics, Recreation and Tourism;
 - Climate Change and Carbon Balance; and
 - Aviation and telecommunications.

Attendees were invited to complete a short survey providing feedback on the Development. In addition, attendees were provided the opportunity to speak or communicate directly with the Applicant and their representatives either via telephone, email or by postal address.

During the exhibition period a total of approximately 149 visitors were recorded as having visited the dedicated project webpage. 12 questionnaires were completed and Table 3 below outlines responses to questions received.

Table 3: Online Public Exhibition Responses

| Question | Yes | No | Undecided |
|--|--|-----|-----------|
| Do you think that wind farms should play a role in generating electricity in Scotland? | 55% | 9% | 36% |
| Are you generally supportive of windfarms? | 45% | 9% | 45% |
| Do you think Corriegarth is a suitable location for a windfarm? | 27% | 55% | 18% |
| Are you supportive of the proposed Corriegarth 2 windfarm | 27% | 55% | 18% |
| Have you found the exhibition useful? | 36% Very useful 45% useful 9% not useful 9% undecided | | |



4 APPLICATION DETAILS AND TIMELINE FOR SUBMISSION

4.1 Submission

The Applicant intends to lodge the Section 36 application in August 2020. The application will be for a wind farm consisting of up to 17 turbines and ancillary infrastructure. The ancillary infrastructure will include crane hardstanding areas, transformers, extension to operational access tracks, underground cabling, a substation, and a temporary construction compound. Table 4 below outlines the key parameters, while the layout is shown in Figure 4.

Table 4: Key Parameter of the Development

| Element | Details |
|------------------------------------|---|
| Turbines | 17 turbines, each with a tip height of up to 149.9 m. Each turbine may require a small transformer located at its base. Each turbine will have a foundation with a diameter of between 16 and 21 m. |
| Access Track | The design of the Development will make use of the operational Corriegarth Wind Farm infrastructure where possible, including the existing access tracks leading from the B862 to the indicative turbine locations. Minor upgrades on the construction track may be required to allow for larger blade delivery. New access tracks will be required to connect the existing track network to the new turbine locations. New tracks will be constructed of a graded stone and be approximately 5 to 6 m in width or floated, as appropriate for the ground conditions. |
| Electrical Infrastructure | Onsite underground cabling will be laid alongside the access tracks where possible, linking the turbine transformers to a new windfarm control building and Scottish & Southern Electricity Network (SHE Transmission) substation. Both buildings would be sited next to the existing operational Corriegarth Wind Farm control building and substation and be similar in design. The windfarm control building will measure approximately 40×20 m and take the form of a single storey building housing the electrical infrastructure. The SHE Transmission substation will be similar to the existing operational substation which has dimensions of 130×80 m The EIA will assume and assess transformers located outside of the turbines. On site underground cabling will be laid alongside the access tracks, where possible, linking the turbine transformers to the onsite substation. |
| Crane Hardstanding | Crane hardstandings will be required adjacent to each turbine, this will consist of an area of approximately 1400 m² at each turbine. In addition to the main hardstanding area, there will be additional flattened areas for crane assembly and turbine blade storage; however, these will be temporary and not constitute hardstanding. |
| Temporary Construction Compound | A temporary construction compound will be required during the construction of the Development, forming an area of hardstanding providing space for temporary welfare, parking, lay down areas and potentially concrete batching; this will measure approximately 100 x 50 m. |

Under normal circumstances, the EIA Report would be made available for public viewing at suitable locations in the vicinity of the Development. The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020⁶ include provisions

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⁶ The Scottish Government (2020) The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 [Online] Available online at: https://www.legislation.gov.uk/ssi/2020/123/contents/made (Accessed 02/07/2020)



which suspend the requirement to make such documents available for public viewing at this time, rather, that documents and information should be published online during the emergency period.

In the interests of public health and safety and due to COVID-19 restrictions on both public gatherings and the closure of libraries and offices to the public, the EIA Report will be posted online on the dedicated project webpage (address to be confirmed at application stage), as well as the ECU and Council planning portals.

The application for Section 36 consent will be advertised in the Edinburgh Gazette for two consecutive weeks, a national newspaper for one week, and at least one local newspaper for two weeks. The dates for the advert publication are yet to be determined and will be agreed with ECU at a time closer to the submission date.

4.2 Implications of Covid-19 Access Restrictions on Application

On 23rd March 2020 the Scottish Government announced a number of measures to be implemented in response to the emerging COVID-19 pandemic, of which included restrictions on travel for non-essential workers. In response, the Scottish Mountain Rescue published an appeal on 23rd March 2020 calling for "unnecessary mountain activities" to be avoided. Following a slight relaxation in the provision of outdoor access set in place by the Scottish Government in May, Scottish Mountain Rescue published further advice on 13th May 2020 clarifying their interpretation that walkers should stick to paths and tracks at lower elevation given the greater risk of injuries that take place in the hills. The Scottish Government's restrictions and further guidance from Scottish Mountain Rescue, in particular, curtailed the landscape and visual assessment site work as prior to this date the final viewpoints had not been agreed with the Council as well as remote viewpoints being inaccessible due to snow cover during February and March 2020. At the time of writing, although restrictions are gradually being eased, it is not certain that all the viewpoints will be visited and assessed by the landscape architect nor the required photomontages produced prior to the submission of the application. If necessary, the applicant will submit outstanding LVIA visualisations as Supplementary Environmental Information (SEI) at the earliest possible time following the application (under Regulation 19 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017). This approach will allow the ECU to commence consultation on all other matters within the Environmental Assessment Report including the majority of the LVIA. This approach was discussed and agreed with the ECU on 25th June 2020.

This approach is being taken due to the following:

- The final viewpoint list was not agreed with Council until 12th March 2020;
- Particularly heavy snow and inclement weather prevented access to the remote viewpoints within the Monadhliath; and
- Although not requested during scoping, in May 2020 the Cairngorms National Park Authority requested that an Assessment of Effects on Special Landscape Qualities (AESLQs) be undertaken for the Cairngorms National Park. This request included three accompanying viewpoints (VP 20: Carn Ban (photomontage), VP 21: Càrn an Fhreiceadain (wireline) and VP 22: A'Chailleach (wireline)) in addition to the agreed LVIA viewpoints.

As such, the following viewpoints may be submitted by way of SEI:

- VP 6: Beinn Bhreac Mhor;
- VP 9: Carn Sgulain;
- VP 13: Geal Charn;
- VP 14: Corrievairack Hill:
- VP 20: Carn Ban (AESLQ VP requested by Cairngorms National Park Authority (CNPA));



- VP 21: Càrn an Fhreiceadain (AESLQ VP requested by CNPA); and
 VP 22: A'Chailleach (AESLQ VP requested by CNPA).



5 APPENDIX A - SCOPING COMMENTS

Table A1 Scoping Consultee Comments and Responses

| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|--------------------------------------|--|---|--|
| ВТ | Other Issues (Telecommunications) | No interference. | Noted. | N/A |
| CNPA | Overarching | In accordance with working protocol ⁷ , SNH provide advice on the potential effects of development outwith the Park. Refer to SNH guidance and judgement. | SNH guidance will inform LVIA. Following further consultation undertaken with CNPA via SNH, an Assessment of Effects on Special Landscape Qualities (AESLQs) for the Cairngorms National Park will be included within the LVIA, accompanied by additional visualisations (photomontage and wirelines) as agreed with the CNPA landscape architect via SNH Case Officer. | Chapter 6 - Landscape and Visual Amenity |
| HES | Cultural Heritage | Content with scope of assessment identified for interests in the report. Not identified any impacts which considered likely to be significant. No further advice on scope of assessment. | Noted. | N/A |

⁷ SNH (2013). Agreement on roles in advisory casework between Scottish Natural Heritage and Scottish National Park Authorities. Available at: https://www.nature.scot/agreement-roles-advisory-casework-between-scottish-natural-heritage-and-scottish-national-park.



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|------------------------------|-----------------------------|---|---|--|
| HIAL | Other Issues (Aviation) | The Development falls within HIAL safeguarded areas for Inverness Airport therefore turbines could affect instrument flight procedures and performance of electronic aeronautical systems for the airport. Do not wish to see degradation of these services, particularly Radar installation. Likely to object any proposal which impacts on the Instrument Flight Procedures or Navigation Aids (e.g. Radar), unless a solution to mitigate the effect on Inverness Airport's operation can be found. Open to further consultation with Developer. | Impact and mitigation solution discussions ongoing with HIAL. | Chapter 16 - Other Issues |
| Joint Radio Company (JRC) | Other Issues (Utilities) | Does not interfere with utilities infrastructure. | Noted. | N/A |
| Marine Scotland | Ecology | The following information should be presented in the EIA Report: Results from site characterisation surveys and/or up to date data obtained from other sources to assess the presence and abundance of fish populations within and downstream of the proposed development area; Outline of the proposed site specific mitigation measures and details regarding proposed monitoring programmes for water quality and fish populations before, during and after construction and decommission; and Consideration of potential cumulative impacts on the water quality and fish populations as a result of adjacent developments with hydrological connectivity to the present proposal. | Fisheries Habitat Surveys have been completed, and these, as well as desk based data, will be used to inform the assessment on sensitive aquatic species, and appropriate recommendations to mitigate and monitor effects will be included in the EIA Report. The Ness and Beauly Fisheries Trust and Findhorn District Salmon Fisheries Board were consulted; however they did not provide a response. | Chapter 7 - Ecology |
| MOD | Other Issues (Aviation) | MOD request the Development should be fitted with MOD accredited aviation safety lighting. The cardinal turbines should be fitted with 25 candela omni-directional red lighting and infrared lighting Combi with an optimised flash pattern of 60 flashes per minute of 200 ms to 500 ms duration. The remainder perimeter turbines should be fitted with 25 candela omni-directional or Infrared lighting with an optimised flash pattern of 60 flashes per minute of 200 ms to 500 ms duration. | Lighting requirements noted. Seeking confirmation from MOD on the requirement for candela lighting which the Applicant has deemed unnecessary and is seeking to avoid. Discussions ongoing. | N/A |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|----------------------------|-------------|--|--|--|
| Mountaineering Scotland | LVIA | Agree with proposed upland viewpoints (6, 9, 11, 13, 14, and 15). Carn na Saobhaidhe, at 811 m, is a Corbett and thus a point of attraction for hill-walkers. Suggest inclusion as a viewpoint. | Carn na Saobhaidhe was not used as a viewpoint for the operational Corriegarth Wind Farm and thus has not been included as a viewpoint within the LVIA. | N/A |
| Mountaineering Scotland | LVIA | Concerns additional high-altitude, and taller, turbines would increase adverse impact of the existing highest elevation turbines. Hope concerns will influence design process and expect any effect to be fully dealt with in the LVIA. | The interaction between operational and proposed turbines, including the difference in turbine size, has informed the design of the Development. The LVIA will consider any perceptible differences in turbine scale and the relevant effects. | Chapter 6 – Landscape and Visual Amenity |
| Mountaineering Scotland | LVIA | Agree that full wild land assessment required for the Monadhliath WLA. | Wild Land Assessment will be undertaken, with scope and approach agreed through further consultation with SNH. | Technical Appendix A6.3 |
| NATS | Aviation | Does not conflict with safeguarding criteria. No safeguarding objection to the proposal. | Noted. | N/A |
| RSPB | Ornithology | Impact assessments should not be restricted just to windfarms but include all development, forestry or recreational pressures that may have an impact on the habitats or species affected. SNH has recently updated guidance on assessing the cumulative impacts of onshore wind farms on birds. | Cumulative assessment will be included with the final list of cumulative developments agreed with SNH and the Highland Council (THC). SNH guidance will be followed. | Chapter 8 - Ornithology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|----------------|--|---|--|
| RSPB | Geology & Peat | The EIA to demonstrate how the site design has avoided any areas of deep peat or priority habitat. Following assessment of impacts, options for on- and off-site peatland restoration should be included in an HMP. | The site layout design will be based on environmental constraints including peat depths. The design will seek to avoid deep peat and peat disturbance, where possible. Details of peat excavation, reuse and peatland restoration will be included in the Peat Management Plan. Existing Habitat Management Plan (HMP) relating to peat restoration is in place for the operational Corriegarth Windfarm. | Technical Appendix 13.2 and Chapter 7 - Ecology |
| RSPB | Ornithology | Detailed information on golden eagle territories in NHZ10 is available from Highland Raptor Study Group; and Satellite tagging information on usage of the area by immature and adult birds may also be available from Natural Research. | Historic data will be obtained from Raptor Study Group and other sources and used in the impact assessment. | Chapter 8 - Ornithology |
| RSPB | Ornithology | As well as collision risk, the impact on loss of available foraging area through direct habitat loss and/or displacement effects for any territories that overlap with the windfarm footprint must also be assessed within the EIA (and should be considered in any assessment of cumulative impacts with other developments). | Noted - impact on loss of foraging through direct habitat loss / displacement will be assessed in the EIA Report. Cumulative effects on golden eagle are likely to be a key risk in this respect and golden eagle PAT modelling and population modelling will be undertaken to inform the impact assessment. | Chapter 8 - Ornithology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-------------------|-------------|--|--|--|
| RSPB | Ornithology | Habitat loss and displacement effects should also be assessed for other species of conservation concern, particularly breeding waders that may be particularly susceptible to displacement. A Habitat Management Plan will be required to ensure suitable good quality habitat is managed/created elsewhere. RSPB Scotland can provide recent data on the River Spey - Insh Marshes SPA via a data request to inform an assessment of impacts. | Displacement effects will be considered in the impact assessment. An extensive HMP is in place across the existing windfarm site, and the impact assessment will ensure that the proposed extension doesn't compromise the objectives of the existing plan. An adverse effect on the SPA is considered very unlikely. Additional on-site habitat management measures will only be promoted if required by the assessment findings. | Chapter 8 - Ornithology |
| Scottish Forestry | Forestry | Small areas of woodland within proposed Corriegarth 2 Wind Farm boundaries. Those are listed as 'ancient of semi-natural origin' on Ancient Woodland Inventory, and potentially affected by the proposed upgrades to the construction track. Scottish Government's Policy on Control of Woodland Removal (CoWRP) contains strong presumption against removing the above type of woodland, and SF seeks reassurance that woodland present within proposed development's site will be protected. If any woodland is to be permanently removed to accommodate the proposed development, the EIA Report must provide that information and compensatory plating will be required, as per requirements of CoWRP. | No woodland is to be removed as part of the Development. | Chapter 4 - Project Description |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|----------------|-----------------------|--|---|--|
| Scottish Water | Hydrology | 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. Greenfield sites will not be considered and a connection to the combined network will be refused. In order to avoid costs and delays where a surface water discharge to our combined sewer system is proposed, 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. | Noted. | Chapter 12 - Hydrology and Hydrogeology |
| Scottish Water | Hydrology | Review of records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Loch Ness supplies Invermoriston Water Treatment Works (WTW) therefore essential that water quality and 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. Relatively large catchment and activity is sufficient distance from the intake that it is likely to be low risk. | Noted, this will be covered with the EIA and appropriate avoidance, mitigation and protection measures including water quality monitoring will be outlined in Chapter 12: Hydrology and Hydrogeology. | Chapter 12 - Hydrology and Hydrogeology. |
| SEPA | Design Overarching | Welcomes the use of the operational Corriegarth Wind Farm infrastructure, including the existing access tracks leading from the B862. Existing infrastructure such as laydown areas or borrow pits to be re-used in order to minimise further impacts to the environment; and disturbed areas utilised and to safeguard undisturbed habitat. | Noted. Existing infrastructure will be fed into site design to ensure further impacts are minimised. | Overarching, however summarised in Chapter 3 - Site Selection and Design, and the Design and Access Statement. |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|---|---|--|--|
| SEPA | Design Geology & Peat | The layout should be designed to minimise the disturbance of peat supported by a full site specific Peat Management Plan. Depending on the results of the peat depth survey, piling turbine bases and floating all infrastructure on site should be considered. | Much of the site layout design has been based on environmental constraints including peat depths. The design will seek to avoid deep peat and peat disturbance. The use of floating tracks will be adopted in the site where practical. The PMP will discuss peat avoidance in further detail. | Chapter 4 - Project Description and Technical Appendix 13.2 |
| SEPA | Design Geology & Peat Ecology | Opportunities for peatland restoration proposals to help compensate for the peat disturbance caused by the development should be included and could form part of the proposed Habitat Management Plan (HMP). A draft of the HMP should be included in the application. | Details of potential peatland restoration will be included in the PMP. Existing Habitat Management Plan (HMP) implemented for much of the site. | Technical Appendix 13.2 and Chapter 7 - Ecology |
| SEPA | Design Geology & Peat | Interlinking tracks to the proposed turbines should be as short as possible. Paralleling tracks or excessive use of spurs etc. are unlikely to be supported. Restoration of any redundant tracks on site to compensate for the impacts of the proposal are encouraged. | Noted. Details of potential peatland restoration will be included in the Outline PMP. | Technical Appendix 13.2 and Chapter 7 - Ecology |
| SEPA | Hydrology & Hydrogeology Geology & Peat | Watercourse crossings and potential impacts to the water environment should be minimised, especially on steep ground to the south of the proposal. All watercourse crossings should be designed to accommodate the 1 in 200 year event plus climate change designed as traditional style bridges or bottomless arched culverts. Other infrastructure located well away from watercourses. | All culverts will be designed to accommodate 1 in 200 year flood event plus the appropriate SEPA climate change allowance as standard. | Chapter 12 - Hydrology and Hydrogeology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|--|---|--|---|
| SEPA | Geology & Peat | Floating tracks for any areas of peat exceeding a depth of 1m expected and ideally throughout the whole development unless proven technically infeasible. All tracks should be kept a minimum 10m away from any waterbody, with the exception of watercourse crossings. The 10 m buffer to be shown on a site plan to confirm that this buffer is maintained and that no construction works occur within this buffer. | Details of floating tracks and peat depths recorded will be included in the Peat Management Plan. Relevant buffer distances will be included in the design and shown on the final site plan. | Technical Appendix 13.2 |
| SEPA | Ecology Hydrology and Hydrogeology | The layout should be designed to avoid GWDTE and sensitive wetlands which are identified through an NVC survey. All GWDTE to be located outwith a 100 m radius of all excavations shallower than 1m and outwith 250 m of all excavations deeper than 1m. | Noted - GWDTE location and effects will be identified and assessed as part of Ecology chapter and Hydrology chapter, in line with SEPA LUPS-GU31 guidance. | Chapter 12 - Hydrology and Hydrogeology Chapter 7 - Ecology |
| SEPA | Ecology Geology & Peat | Both the peat and NVC surveys should have all proposed infrastructure overlaid and clearly demonstrate how the proposals have located infrastructure away from deep peat (>1m) and avoided GWDTE and sensitive wetland habitats. Drafts of these surveys to be submitted for early consideration and discussion prior to formal submission to the Planning Authority. | Noted. Further consultation with SEPA will be undertaken upon completion of Phase 2b surveys. Figures showing design with constraints including peat depths, will be submitted to SEPA prior to submission | Chapter 12 - Hydrology and Hydrogeology Chapter 7 - Ecology |
| SEPA | Hydrology Engineering | The layout must ensure a separation distance of 50m between turbines and water bodies and shown on an appropriately scaled site plan showing 50 m buffer. | An appropriately scaled site plan and infrastructure layout showing site constraints including surface water 50 m buffers will be provided as part of the EIA. | Chapter 12 - Hydrology and Hydrogeology |
| SEPA | Design Overarching | If battery storage is pursued, include an indicative layout plan showing the location, design and scale of the facility. Information on environmental risks associated with the facility (i.e. risk of battery acid leaks) and mitigation should be provided, such as bunding and appropriate drainage. | Battery storage no longer to be included. | N/A |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SEPA | Hydrology | A Construction Site Licence under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) may be required. | An application for a Construction Site Licence will be made at the appropriate time i.e. following consent and prior to construction commencing. | N/A |
| SNH | LVIA | Proposal located within 5 km of Wild Land Area (WLA) 20 Monadhliath. Undertake a wild land assessment as part of the EIA. Contact SNH to discuss scope of Wild Land Assessment, including appropriate study area. Ensure any impact on the qualities of the WLA, are assessed both for the proposal in isolation and cumulatively. | Further consultation undertaken with SNH to determine scope and approach to Wild Land Assessment of effects on WLA 20: Monadhliath. Cumulative landscape and visual impact assessment will inform Wild Land Assessment. In accordance with SNH guidance and further information received during consultation, the Wild Land Assessment will consider where the qualities of the WLA are most strongly expressed and how WLA 20 is experienced by receptors. The assessment will focus on areas of introduced additional visibility of wind turbines resulting from the Development. | Technical Appendix A6.3 |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SNH | LVIA | The wild land assessment should follow methodology and guidance in the new draft 2017 guidance, for assessing the impact of Development on Wild Land Areas identified on the 2014 SNH WLA map, drawing on the published descriptions. In order to support Scottish Planning Policy, apply the 2017 draft guidance in place of the 2007 Assessing the impacts on wild land: interim guidance note. Applicant to discuss the scope of the assessment with SNH. | Draft 2017 guidance, 2014 SNH WLA map and published WLA 20 description will inform Wild Land Assessment. | Technical Appendix A6.3 |
| SNH | LVIA | Should visible aviation lighting be required, night-time lighting assessment should be undertaken for the WLA. Open to further discussion on the scope of this if such an assessment is required. | The Applicant is seeking to avoid any necessity for visible aviation lighting, with any lighting limited to infrared lighting only. Therefore, no assessment will be undertaken. | N/A |
| SNH | LVIA | Proposal may raise issues of national importance, therefore SNH may object to the principle of the Development in this location. SNH will take account of final proposal and information presented in an EIA Report as well as the cumulative situation at the time of submission. | Cumulative landscape and visual impact assessment will inform Wild Land Assessment. | Technical Appendix A6.3; Chapter 6 - Landscape and Visual Amenity |
| SNH | Ornithology | The proposal is located within Natural Heritage Zone (NHZ) 10 therefore has high potential for golden eagles to be affected. Further assessment of any impacts of the proposal on golden eagle within the EIA Report. Highlight to applicant that should proposal be consented; consultee advises further contribution to the Regional Eagle Conservation Management Plan (RECMP). | Noted. Cumulative effects on golden eagle will be included within the assessment. Contribution to RECMP has will be considered as part of the mitigation options. | Chapter 8 - Ornithology |
| SNH | Ornithology | The scoping report identified that the proposal has connectivity with the River Spey-Insh Marches SPA designated for raptors and wildfowl. SNH welcomes that a detailed assessment of potential impacts on the SPA species will be undertaken within the EIA Report. | All designated sites identified in the scoping report will be considered in Chapter 9 - Ornithology, with SPAs assessed within the context of the Habitats Regulations Appraisal (HRA) process. | Chapter 8 - Ornithology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SNH | Ecology | Agree with proposed surveys for bats, otter, water vole, red squirrel, badger and pine marten and wildcat. If any of these species are identified, a Species Protection Plan should be included with the EIA Report. | Noted. | Chapter 7 - Ecology |
| SNH | Geology and Peat | Possible to build a wind farm of the scale proposed without significant effects on deep peat and priority peatland habitat. The EIA Report will address how a wind farm can be constructed without compromising this national interest. If the proposal does not demonstrate that any significant effects on the qualities of these peatland areas can be overcome for siting, design and mitigation, consultee may object. | Opportunities to mitigate impacts through siting, design and other measures will be considered. | Chapter 13 - Geology and Peat |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SNH | Ecology | Agreed commitment to Peat Management Plan and Construction Environmental Management Plan. Advise that an HMP may be required. The HMP should clearly demonstrate that any impacts on peatland habitats can be substantially overcome and there will be no overall loss of peatland habitat or the services that peatland delivers. The plan should account for other habitats subject to loss and damage from the proposal. | An outline Peat Management Plan (oPMP) will be included as appendix to the EIA Report. It is noted that the existing HMP covers large portions of the site and further HMP proposals will only be promoted if required by assessment findings. A Construction Environmental Management Plan (CEMP) will not be included in the EIA Report as in the applicant's experience, in discharging conditions and constructing windfarms, preparation of this document is more usefully done at the pre-construction phase when it can be more targeted, informed by site investigations and design and agreed by the site civil contractors. Nevertheless the EIA will outline, and commit to, best practice pollution prevention mitigation measures to be adopted. | Chapter 7 - Ecology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SNH | Ecology | If wild deer are present on or will use the development site, an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (e.g. access and recreation, road safety, etc.) should be presented with in the EIA Report. Where significant impacts may be caused, a draft deer management statement will also be required to address the impacts. Refer to SNH guidance "What to consider and include in deer assessments and management at development sites". Appropriate deer management will be vital in ensuring habitat restoration is successful. Advise that this should be referenced within the HMP. | If required will be addressed within an Outline HMP, within Chapter 7 of the EIA Report. | Chapter 7 - Ecology |
| SNH | Ecology | Collaborate with neighbours and other interested parties, as well as the Monadhliaths Deer Management Group during the assessment and any subsequent management, in line with The Code of Practice on Deer Management. If a Deer Management Statement is produced then it should comply with the Best Practice Guidance on Deer Management Plans. | A Deer Management Plan will not be produced as part of the EIA Report, however if required this will be addressed within an Outline HMP, in Chapter 7 of the EIA Report. | Chapter 7 - Ecology |
| SNH | Decommissioning | Consider the implications of decommissioning and redevelopment of proposal, and assess the likely impacts of both. The Decommissioning and Restoration Plan (DRP) presented in the EIA Report should be brief but provide an appropriate level of detail on how site infrastructure may be removed and how the site is intended to be restored. The DRP should be revised 3-5 years prior to the year of decommissioning, to provide full details of decommissioning and restoration for approval by the Planning Authority. | Impacts of decommissioning will be addressed throughout the EIA. A high level Decommissioning Restoration Plan will be included in the application. | N/A |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| SNH | Decommissioning | Restoration to include removal of new tracks and restoration of existing tracks to their pre-wind farm width during the decommissioning process, to return the site to the same or better state than pre-construction. Recognise there could be situations where retention of some tracks might be beneficial (e.g. for access and recreation where they provide links to important routes, where removal may cause damage to important natural heritage interests, etc.). The pros and cons of track removal/retention for each individual site can be considered more fully in the 3-5 years prior to a decision being taken on decommissioning. This should be done in consultation with the Planning Authority (and SNH and SEPA, as appropriate). | Noted – decommissioning plan will include both removal and retention options. | N/A |
| THC | EIA | EIA Report must include: A description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. A plan with eight figure OS Grid coordinates for all main elements of the proposal should be supplied; A description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; The risk of accidents, having regard in particular to substances or technologies used; An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development. The estimated cumulative impact of the project with other consented or operation development. | Noted | Chapter 4 - Project Description |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | EIA | A statement is required which outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following: The range of technologies that may have been considered; Locational criteria and economic parameters used in the initial site selection; Options for access; Design and locational options for all elements of the proposed development (including grid connection); The environmental effects of the different options examined. Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings. | Noted a site evaluation and design chapter will be included within the EIA Report. | Chapter 2 – Energy & Planning Policy |
| THC | Planning | The EIA Report should recognise the existing land uses affected by the development having particular regard for The Highland Council's Development Plan inclusive of all statutorily adopted supplementary guidance. Particular attention should be paid to the provisions of the Onshore Wind Energy Supplementary Guidance inclusive of any Landscape Sensitivity Appraisal. This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and guidance on renewable energy and wind energy should be considered in this section. The purpose of this chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy. | Noted. This will be addressed in the EIA Report and the standalone Planning Statement. | Chapter 2 – Energy & Planning Policy Chapter 6 – Landscape and Visual Amenity The standalone Planning Statement |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | LVIA | LVIA should adhere to THC requirements. Note: All existing turbines, at the operational Corriegarth Wind Farm and any other wind energy development included in the cumulative baseline, should be re-rendered even if they appear to be facing the viewer in the photograph to ensure consistency. | Visualisations will be prepared in accordance with Highland Council 2016 Visualisation Standards for Wind Energy Developments. | Volume 2d: LVIA Visualisations Part 2 of 2 (THC) |
| THC | LVIA | All elements of a development (e.g. Borrow Pits etc.) are important to consider within any EIA Report, including the visual impact of the tracks which have not already been assessed and consented through the operational Corriegarth Wind Farm permission. | LVIA will consider impacts of proposed wind turbines, site infrastructure, new access tracks and ancillary structures. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | THC consider that EIA should undertake the cumulative assessment over a study area the same as the visual assessment, a minimum 35km study area. THC recommend that you utilise THC interactive Wind Turbine map to identify other schemes within the study area. | Cumulative assessment will consider wind farm development within 60 km of the Development; however the assessment will focus on developments that are likely to give rise to significant cumulative effects and therefore will concentrate on wind farm development within 40 km. | Chapter 6 - Landscape and Visual Amenity |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | LVIA | THC request the following additional viewpoints: A9 in the vicinity of the Kessock Bridge and the north and south bound picnic sites at North Kessock. Cairngorm Mountain Summit representative view from the vicinity of the top of the ski-lifts, and Ptarmigan restaurant should be included. A viewpoint within the Loch Lochy and Loch Oich SLA should be considered to represent views around the Great Glen from the west where the Special Quality of 'Classic Highland Scenery, Distinctive Mountain-top Views' is related to the outstanding views which occur from higher elevations. Viewpoints which represent the Glen Strathfarrar NSA, Glen Affric NSA, Strathconon, Monar and Mullardoch SLA and Moidart, Monar and Glen Shiel SLA. | The following assessment viewpoints will be included: VP 16: North Kessock- A9 northbound picnic area (south bound picnic area not included due to screening by intervening vegetation) VP 19: Ptarmigan Restaurant, Cairngorm VP 17: Ben Tee, representing views experienced by hill walkers within Loch Lochy and Loch Oich SLA VP 18: Toll Creagach, representing views across Glen Affric NSA on the boundary of the Strathconon, Monar and Mullardoch SLA Following further consultation, it was agreed with THC that these viewpoints would be illustrated with wirelines only. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | New photography should be used wherever possible and the use of the photography used for the operational Corriegarth Wind Farm will only be acceptable in certain circumstances. | Noted. Approach to remaining fieldwork and photography for outstanding viewpoints TBC. Pending updates regarding travel restrictions put in place due to COVID-19. | Chapter 6 - Landscape and Visual Amenity; Volume 2d: LVIA Visualisations Part 2 of 2 (THC) |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | LVIA | As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy schemes within the area as well as those currently under consideration. The detailed location of viewpoints will be informed by site survey, mapping and predicted Zones of Theoretical Visibility. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community takes this into account. The final list of viewpoints should be agreed with the Planning Authority. | Stratherrick & Foyers CC has not requested any additional viewpoints. A final list of assessment viewpoints have been agreed with THC. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. | Reason for selection of assessment viewpoints will be included in LVIA. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | Content with 40 km study area. Expect detailed assessment of effects to be undertaken for the whole study area. | 40 km Study Area established for LVIA. The assessment will focus on potential significant effects. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | Ensure all recreational routes such as core paths, the national cycle network, Great Glen Way, South Loch Ness Trail and the Loch Ness 360 routes and other long distance trails are assessed. It should be noted that these routes are used by a range of receptors. | Effects on views experienced by users of recreational routes will be considered within LVIA. | Chapter 6 - Landscape and Visual Amenity |



| Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| LVIA | Agree that study area for cumulative impacts should extend to 60 km. Given the cumulative impact of renewable energy in the area, the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by THC – see visualisation standards document. | Cumulative assessment will consider the pattern of existing and proposed wind farm development within a 60 km radius of the Development, however the assessment will focus on developments that are likely to give rise to significant cumulative effects and therefore will concentrate on wind farm development within 40 km; Visualisations will be prepared in accordance with Highland Council 2016 Visualisation Standards for Wind Energy Developments. | Chapter 6 - Landscape and Visual Amenity |
| LVIA | The SNH 2019 landscape character assessment should be used. | Landscape Character Types (LCTs) defined within SNH 2019 landscape character assessment will be considered within LVIA. | Chapter 6 - Landscape and Visual Amenity |
| LVIA | Assessment of the impact on Wild Land Areas to be included within the EIA Report given the proximity to a number of Wild Land Areas and the theoretical visibility of the scheme from within wild land areas. | Wild Land Assessment for WLA 20: Monadhliath will be undertaken. Further consultation has been undertaken with SNH regarding the scope and approach to the Wild Land Assessment. Assessment of effects on further WLAs within LVIA | Technical Appendix A6.3 |
| | LVIA | LVIA Agree that study area for cumulative impacts should extend to 60 km. Given the cumulative impact of renewable energy in the area, the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by THC – see visualisation standards document. LVIA The SNH 2019 landscape character assessment should be used. LVIA Assessment of the impact on Wild Land Areas to be included within the EIA Report given the proximity to a number of Wild Land Areas and the theoretical visibility of the scheme from within | LVIA Agree that study area for cumulative impacts should extend to 60 km. Given the cumulative impact of renewable energy in the area, the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by THC – see visualisation standards document. Cumulative assessment will consider the pattern of existing and proposed wind farm development within a 60 km radius of the Development, however the assessment will focus on developments that are likely to give rise to significant cumulative effects and therefore will concentrate on wind farm development with Highland Council 2016 Visualisation Standards for Wind Energy Developments. LVIA The SNH 2019 landscape character assessment should be used. LVIA Assessment of the impact on Wild Land Areas to be included within the EIA Report given the proximity to a number of Wild Land Assessment for WLA 20: Monadhilath will be undertaken. Further consultation has been undertaken with SNH regarding the scope and approach to the Wild Land Assessment. Assessment. Assessment of effects on |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | LVIA | Assessment of the proposal against the criterion set out in the Council's Onshore Wind Energy Supplementary Guidance (SG) to be included within the LVIA chapter of the EIA Report. | Information to be provided in LVIA Chapter regarding layout design process and consideration of the SG. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | Assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. As part of this the impact on the Special Landscape Areas (SLA) must be undertaken using the SLA citations. | Assessment of effects on special qualities of the Loch Ness and Duntelchaig SLA will be included within LVIA. | Chapter 6 - Landscape and Visual Amenity |
| THC | LVIA | Aviation lighting may be required due to the proposed scale and location of the turbines. The effect of the aviation lighting should be assessed through the EIA process. A Lighting Impact Assessment will be required. This is a matter that should be considered from all viewpoints. It should form part of the LVIA chapter of the EIA Report but should also be considered as part of the Wild Land Assessment. | Applicant is seeking agreement from MOD that there is no requirement for low intensity lighting No medium or high intensity aviation lighting is required as turbines are less than 150 m. A Lighting Impact Assessment is therefore not required. | N/A |
| THC | LVIA | Content that residential visual amenity is assessed within the LVIA chapter. | Noted. Effects on views experienced by residential receptors will be considered within the assessment of effects on views from representative viewpoints and settlements. No Residential Visual Amenity Assessment (RVAA) will be undertaken. | Chapter 6 - Landscape and Visual Amenity |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Ecology | The EIA Report should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc.) interest on site. It needs to be categorically established which species are present on the site, and where, before a future application is submitted. Further the EIA Report should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programme (such as native- tree planting, stock exclusion, etc.) for the proposed site should be provided and take into consideration the requirements to be agreed via condition in relation to operational Corriegarth Wind Farm. It is expected that the EIA Report will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans. | The assessment will be carried out in accordance with this comment. | Chapter 7 - Ecology |
| THC | Ecology | The EIA Report should provide a baseline survey of the plants (and fungi) and trees present on the site to determine the presence of any rare or threatened species. | The assessment will be carried out in accordance with this comment. | Chapter 7 - Ecology |
| THC | Ecology | The EIA Report should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. | The assessment will be carried out in accordance with this comment. | Chapter 7 - Ecology |
| THC | Ecology | If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats and other interests. | Noted. | Chapter 7 - Ecology |
| THC | Ecology | The EIA Report needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development. The EIA Report should evidence consultation input from the local fishery board(s) where relevant. | The assessment will be carried out in accordance with this comment. | Chapter 7 - Ecology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Ecology | The EIA Report should include an assessment of the effects on Ground Water Dependent Terrestrial Ecosystems (GWDTE). | The assessment will be carried out in accordance with this comment. | Chapter 12 - Hydrology and Hydrogeology Chapter 7 - Ecology |
| THC | Ornithology | An assessment of the impacts on birds through collision, disturbance and displacement from foraging / breeding / roosting habitat will be required for both the proposed development site and cumulatively with other proposals. Of particular interest in this area is the Golden Eagle. Consideration should be given to the findings of the research undertaken as part of the NHZ10 Regional Golden Eagle Conservation Management Plan. The EIA Report should be clear on the survey methods and any deviations from guidance on ornithology matters. | All potential impacts on bird species will be assessed as part of the EIA. Cumulative effects on golden eagle will be considered. Contribution to RECMP has been standard mitigation for more recent NHZ 10 projects where eagles have been present. Full methodology and any deviations from standard guidance will be outlined. | Chapter 8 - Ornithology |
| THC | Ornithology | The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the planning application process, not as an issue which can be considered at a later stage. | The baseline ornithology surveys and data searches include Schedule 1 species, which will be assessed as part of the EIA. | Chapter 8 - Ornithology |
| THC | Noise | The applicant will be required to submit a noise assessment with regard to the operational phase of the development. 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 assessment will be carried out in accordance with this comment. | Chapter 10 - Noise |
| THC | Noise | The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development. | The assessment will be carried out in accordance with this comment. | Chapter 10 - Noise |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Noise | The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. | The assessment will be carried out in accordance with this comment. | Chapter 10 - Noise |
| THC | Noise | The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed. | The assessment will be carried out in accordance with this comment. | Chapter 10 - Noise |
| THC | Noise | Background noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with THC's Environmental Health Officer; it is advised that the developer consults THC's Environmental Health Officer at an early stage to discuss the proposed methodology. | The development complies with the simplified ETSU-R-97 criteria of 35 dB, LA90, 10min therefore no background noise survey has been undertaken. | Chapter 10 - Noise |
| THC | Noise | The assessment should include a table of figures which includes the following: - The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear. The predicted levels from each existing or consented wind farm development at each NSL. The cumulative levels based on consented and predicted levels at each NSL. The assessment should also include an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels. | The assessment will be carried out in accordance with this comment. | Chapter 10 - Noise |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Noise | When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite. | This request falls outwith the scope of the methodology recommended in Scottish Government Guidance. Further consultation has been carried out with the Environmental Health Department of THC which has established that there is a specific requirement for such an assessment in this case. | Chapter 10 - Noise |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Noise | Where there is potential for disturbance from construction noise the application will need to include a noise assessment. A construction noise assessment will be required in the following circumstances: - • Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm OR • Where noise levels during the above periods are likely to exceed 75dB (A) for short term works or 55dB (A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months). If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation. Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms. | The assessment will be carried out in accordance with this comment, if required. | Chapter 10 - Noise |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Cultural Heritage | The EIA Report needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify: The architectural heritage (Conservation Areas, Listed Buildings) and The archaeological heritage (Scheduled Monuments), The landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development. The inter-relationship between the above factors. | Noted. A full assessment of the impact to cultural heritage assets will be provided within the EIA Report. National Parks, National Scenic Areas, and Areas of Great Landscape Value will be included in the LVIA as landscape designations. | Chapter 9 - Archaeology and Cultural Heritage |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
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| THC | Cultural Heritage | The assessment should contain a full appreciation of the setting of historic environment assets and the likely impact on their settings. Where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings could be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful. | Designated and non- designated heritage assets will be assessed for direct impact within the development footprint as well as the addressing the potential for unknown subsurface archaeology to be present within the site. An indirect assessment will be undertaken on nationally designated assets within 10 km of the Development as well as upon designated heritage assets within 10-15 km that are within the zone of theoretical visibility to determine if the development results in a change of setting that affects cultural significance. Further consultation will be undertaken with THC Historic Environment Team and HES at design freeze to agree heritage assets for inclusion within the EIA. Where relevant, reference may be made within the EIA to visualisations prepared as part of the LVIA when assessing indirect effects upon the setting of identified assets. | Chapter 9 - Archaeology and Cultural Heritage |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|------------|--|--|--|
| THC | Hydrology | The EIA Report needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. THC strongly advise early consultation SEPA to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application. | Acknowledged - addressed in Chapter 12: Hydrology and Hydrogeology including Private Water Supply Risk Assessment (if required). | Chapter 12 - Hydrology and Hydrogeology |
| THC | Hydrology | The EIA Report should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided. | Noted. Any requirement to utilise water for the Development will be assessed within Chapter 12: Hydrology and Hydrogeology. | Chapter 12 - Hydrology and Hydrogeology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|------------|---|---|--|
| THC | Hydrology | You should carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. THC has some information on known supplies but it is not definitive. An on-site survey will be required. | Acknowledged - addressed in Chapter 12: Hydrology and Hydrogeology including Private Water Supply Risk Assessment (PWSRA) and consultation with THC on PWS location has been conducted. Letters/ emails to residents with potential PWS have been sent Acknowledged - PWSRA will be conducted as part of the hydrology chapter. Measures proposed to prevent contamination or physical disruption will be outlined in Chapter 12. On-site hydrology walkover conducted. On-site PWS surveys not conducted to date, but will be if required. | Chapter 12 - Hydrology and Hydrogeology |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|----------------|---|--|---|
| THC | Geology & Peat | The EIA Report must consider the risks of engineering instability relating to presence of peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIA Report should include site specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat. | A Peat Slide Risk Assessment (PSRA) will be undertake in accordance with Scottish Government Guidance and will support the Geology and Peat chapter as a Technical Assessment. The PSRA will detail mitigation measures when working in areas of peatland. In addition, detailed site infrastructure specific peat probing will inform the design in order to avoid where possible any deep peat or minimise the impact on peat. Drainage impacts and dewatering will be covered by Hydrology, Hydrogeology. | Chapter 13 - Geology and Peat, Chapter 12- Hydrology and Hydrogeology Chapter |
| THC | Geology & Peat | The EIA Report should include a full assessment on the impact of the development on peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. THC are of the view this should include probing not just at the point of infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micrositing limits. | Peat probing methodology comprises an approach which covers the need for future micros-siting and provides an opportunity for further peat probing to address areas of deep peat. The details of peat probing, and the impacts on peat will be included in the PSRA and Peat Management Plan (PMP) Technical Appendices. | Technical Appendix 13.1, Technical Appendix 13.2 |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|-------------------------------------|--|---|--|
| THC | Geology & Peat Climate Change IA | Carbon balance calculations should be undertaken and included within the EIA Report with a summary of the results provided focussing on the carbon payback period for the wind farm. A separate assessment of the carbon emissions as a result of construction of the wind farm should be submitted and a scheme for offsetting this, either through biodiversity net gain or compensatory plating should be submitted. | Site design and the findings of the peat depths surveys and peat management plan will inform the Carbon Calculation which will be detailed in the Climate Change Chapter. | Chapter 15 - Climate Change and Carbon Balance. Technical Appendix 13.1, Technical Appendix 13.2 |
| THC | Geology & Peat | The EIA Report should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIA Report should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications. | A borrow pit assessment will be undertaken to identify the available material on site from construction whilst detailing the reinstatement. This assessment will identify the total volume of aggregates and will include proposed borrow pit floor levels and finished reinstatement profiles. | Technical Appendix A4.1 - Borrow Pit Assessment |
| THC | Transport | A Transport Assessment (TA), or section on traffic and transportation, within the Environmental Statement for the project will be required. The TA should identify all roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic, including abnormal load movements, on these roads. Where necessary, the TA should consider and propose measures necessary to mitigate the impact of the development on the road network. Prior to preparation of the TA the developer should first carry out a detailed scoping exercise in consultation with THC, as local roads authority and, as required, Transport Scotland as trunk roads authority. | The Transport assessment will be carried out in accordance with these comments. | Chapter 11 - Traffic and Transport |



| THC | Transport | Matters to be included in the Transport Assessment/Transport Statement: • Identify all public roads affected by the development. In | Road condition and structural assessment of carriageway is beyond the scope of EIA and | Chapter 11 - Traffic and Transport |
|-----|-----------|---|---|---------------------------------------|
| | | addition to transport of major components this should also | can be conditioned. | |
| | | include routes to be used by local suppliers.Establish current condition of the roads. | A consultation letter setting out our position on these matters (i.e. the above) was sent to THC Roads | |
| | | This work which should be undertaken by a consulting engineer acceptable to THC and will involve an engineering appraisal of the routes including the following: | Department on 11/06/2020 for confirmation. To date no response has been received. | |
| | | Assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non- destructive testing and sampling as required; | The other comments will be addressed in the EIA Report chapter. | |
| | | Road surface condition and profile; | | |
| | | Assessment of structures and any weight restrictions; | | |
| | | Road widths, vertical and horizontal alignment and provision of passing places; | | |
| | | Details of adjacent communities; and | | |
| | | Traffic resulting from the proposed development including: - - nos. of light and heavy vehicles - abnormal loads. In respect of long loads trial runs are required. - duration of works - Current traffic flows including use by school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians. - Impacts of proposed traffic including: - - Impacts on carriageway, structures, verges etc. - impacts on other road users | | |
| | | impacts on other road users impacts on adjacent communities swept path and gradient analysis where it is envisaged that passage of traffic could be problematic. | | |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|----------------|---|--|--|
| THC | Transport | Cumulative impacts with other developments in progress and committed developments. Proposed mitigation measures to address impacts identified above including: - • details of the proposed site access at its junction with the public road to the standards set out in The Highland Council's Roads and Transportation Guidelines for New Developments • carriageway strengthening • strengthening of bridges and culverts • carriageway widening and/or edge strengthening • provision of passing places • road safety measures • Traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes. • Details of residual effects. | Consideration of structural elements is beyond the scope of this assessment. Identification of passing places is beyond the scope of this assessment. Traffic management will be considered if significant effects are identified in the assessment. | Chapter 11 - Traffic and Transport |
| THC | Socio Economic | We consider that this should have its own chapter in the EIA Report to ensure that these matters are appropriately addressed and not lost in other assessments. The EIA Report should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. | Noted. This will be covered within the EIA Report. | Chapter 14 - Socio- economics, recreation and tourism |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|----------------|--|--|--|
| THC | Socio Economic | Estimations of who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc. should be included. Wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy. | rt, which may require individual households to be identified, communities or a wider socio economic groupings such as sts & tourist related businesses, recreational groups, omically active, etc. should be included. I farm development experience in this location should be used elp set the basis of likely impact. This should set out the ct on the regional and local economy, not just the national omy. Any mitigation proposed should also address impacts on | |
| THC | Socio Economic | In line with the policies and provisions of the Highland-wide Local Development Plan a plan detailing the following should be submitted as part of the EIA Report: Existing public non-motorised public access footpaths, bridleways and cycleways on the site and any proposed access route from the public road infrastructure; and Proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water. Impacts of the proposed development on the core paths and proposed mitigation if any. | Noted. This will be covered within the EIA Report. | Chapter 14 - Socio- economics, recreation and tourism |
| THC | Socio Economic | The application should be accompanied by an Access Management Plan and consider the requirement for any stopping up orders. | An Access Management Plan is not proposed as the development does not impact any core paths. | Chapter 14 - Socio- economics, recreation and tourism |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|--------------|--|---|--|
| THC | Other Issues | Recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. Demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. Results of these surveys should be contained within the EIA Report to determine whether any suspensive conditions are required in relation to such issues. | le-communication links, aviation interests safeguards, etc. Demonstrate what interests and the outcomes of any consultations with uch as Ofcom, NATS, BAA, CAA, MOD, as Airports Ltd, etc. through the provision of concluded discussions / agreed outcomes. eys should be contained within the EIA whether any suspensive conditions are undertaken with the relevant telecommunication, utility and aviation consultees. Scoping responses from consultees will be included within the EIA Report. Results of baseline and consultation outcomes will form the basis of the | |
| THC | Other Issues | If there are no properties within 11 rotor diameters, which is THC's approach to shadow flicker due to the lower sun given the latitude of the development, the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIA Report. | No properties have been identified within 11 rotor diameters of the Development. Shadow flicker will therefore be scoped out of the EIA Report. | Chapter 16 - Other Issues |
| THC | Forestry | The EIA Report should indicate all the areas of woodland / trees that will felled to accommodate the development, including any off site works / mitigation. Compensatory woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. | No forestry within planning application boundary. | Chapter 16 - Other Issues |
| THC | Other Issues | The EIA Report needs to address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted. | Qualities of local environment will be assessed through the EIA Report, relevant to specific disciplines. No properties have been identified within 11 rotor diameters of the Development. Shadow flicker will therefore be scoped out of the EIA Report. | Chapter 16 - Other Issues |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|--------------|--|---|--|
| THC | Other Issues | Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements. The EIA Report needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction, etc. A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application. | The access track for the operational Corriegarth Wind farm is existing, and minimal upgrades are likely with very few working areas in proximity to houses. Traffic Movement will be considered within the traffic chapter and if necessary, noise chapter. Should dust suppression scheme be required, this could be secured by condition. Relevant climatic factors will be assessed. | Chapter 15 - Climate Change and Carbon Balance |
| THC | EIA | The mitigation being tabled in respect of a single development proposal can be manifold. Consequently the EIA Report should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). | Noted. | Chapter 17 - Summary of Mitigation Measures |
| THC | Hydrology | No comment from flood risk management team | Noted. | N/A |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|------------|--|--|--|
| THC | Hydrology | Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIA Report will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. | where this cannot be avoided. The EIA to identify all water crossings and include attercourse crossings or channelising, with any such elements and design to minimise to the discompanied by photography of each and include dimensions of the watercourse. The applicant to demonstrate choice of y means of a decision tree, taking into ag catchment size (resultant flows), natural crossing details outlined in the Hydrology and Hydrogeology chapter of the EIA Report and outline Water Construction Management Plan. | |
| THC | Transport | General requirements for assessing transport impacts of wind developments on the local road network set out in supporting note. Expect this proposal to adhere with same approach. | Noted. The Traffic and Transport Chapter of the EIA Report will consider this supporting note. | Chapter 11 - Traffic and Transport |
| THC | Transport | Welcome intention to use overall traffic and HGV traffic increases as triggers for assessing impacts. Expect 10 % HGV increases to be considered at sensitive locations. Sensitive locations to include local schools and community facilities within the towns and small communities along proposed access route (s). | Noted. The quoted thresholds will be used at sensitive locations. | Chapter 11 - Traffic and Transport |
| THC | Transport | Expect inclusion of physical condition of the roads and their structural capability to accommodate proposed vehicle numbers and loadings without generating new road safety hazards. Document doesn't recognise the significant stretches that remain substandard in terms of geometry and structural form. South Loch Ness Road Improvement Strategy sets out approach for improving local roads which should be referred to for access. When reviewing stability of access routes and possible mitigation, discussions should be held with the Officers overseeing the above Strategy. | This is beyond the scope of the EIA and it is requested that this work, if required, is undertaken post consent and is secured through an appropriately worded condition of consent. | N/A |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|------------|--|--|--|
| THC | Transport | Disagrees with Section 10.6 of report that "the volume of construction traffic is unlikely to cause any significant disruption to traffic, cyclists or other road users." Such issues are likely to be felt most within the local communities along the proposed access route(s). Discussions with Officers involved in the South Loch Ness Road Improvement Strategy may identify the need for the development to deliver or contribute towards the implementation of such village improvement schemes. | unlikely nt disruption to traffic, cyclists or other road re likely to be felt most within the local e proposed access route(s). Discussions with e South Loch Ness Road Improvement the need for the development to deliver or | |
| THC | Transport | Traffic management measures will be required to safely operate an access strategy for this development that limits impacts on other road users and local communities. Submission should therefore include a Framework Construction Traffic Management Plan (CTMP) that sets out the access restrictions and management measures that any Contractor will be expected to work within when constructing this development | will be required to safely operate elopment that limits impacts on imunities. Submission should Construction Traffic Management access restrictions and management will be expected to work within This is beyond the scope of the EIA and it is requested that this work, if required, is undertaken post consent and is secured through an appropriately worded condition | |
| THC | Transport | Given the scale of tourist traffic within Fort Augustus, consultee would not support light or heavy good traffic linked with the development via Fort Augustus. All such goods traffic serving the site should be routed from the A9 down the B851 and B862 | Noted. The quoted route is the proposed route to site and no delivery traffic will be routed via Fort Augustus. | Chapter 11 - Traffic and Transport |
| THC | Transport | When determining existing baseline traffic levels, data should consider traffic increases during peak tourist season. Appraisal should consider additional traffic from other committed developments expected to be making use of those routes when this development is due to be being constructed. THC Planners should be asked to confirm if they agree with the assessment and to identify any potential developments they feel should be included which haven't been. | ting baseline traffic levels, data should es during peak tourist season. Appraisal nal traffic from other committed d to be making use of those routes when e to be being constructed. THC Planners of they agree with the assessment and all developments they feel should be | |



| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------|------------|---|--|--|
| THC | Transport | Expect preferred route to undergo trial run using equivalent sized vehicle when assessing capability of route to accommodate abnormal route turbine components. Routes out of Inverness Harbour onto the strategic trunk road network, or from any other ports used, will need to be assessed. | ssing capability of route to accommodate element is included as a condition of consent. strategic trunk road network, or from any other | |
| THC | Transport | When selecting routing for abnormal loads, recommend that early consultation with team that considers abnormal load movements and to the structures team, is undertaken. | ders abnormal load movements consultations with the relevant | |
| THC | Transport | No objection to the operational impacts being scoped out but ask that the predicted trip numbers and likely vehicle types are clarified in the submission to support approach. | Noted. Will provide estimated operational traffic numbers. | Chapter 11 - Traffic and Transport. |
| THC | Transport | Predicted trip numbers and vehicle types during the decommissioning process are fully set out and justified, including the worst-case scenario of the access tracks needing to be removed. If demonstrated that predicted trip numbers and patterns will be significantly less than during the construction process, there would be no objection to decommissioning phase being scoped out. | Noted. Will provide estimated decommissioning traffic volumes and types. | Chapter 11 - Traffic and Transport. |
| THC | Forestry | If existing track to operational substation is used, there should be no adverse impact on woodland up to that point. Notes that no woodland to the east of the substation, therefore proposed development would not impact on woodland. Forestry can therefore be scoped out. | Forestry has been scoped out of the EIA Report as no woodland is within site boundary. | N/A |



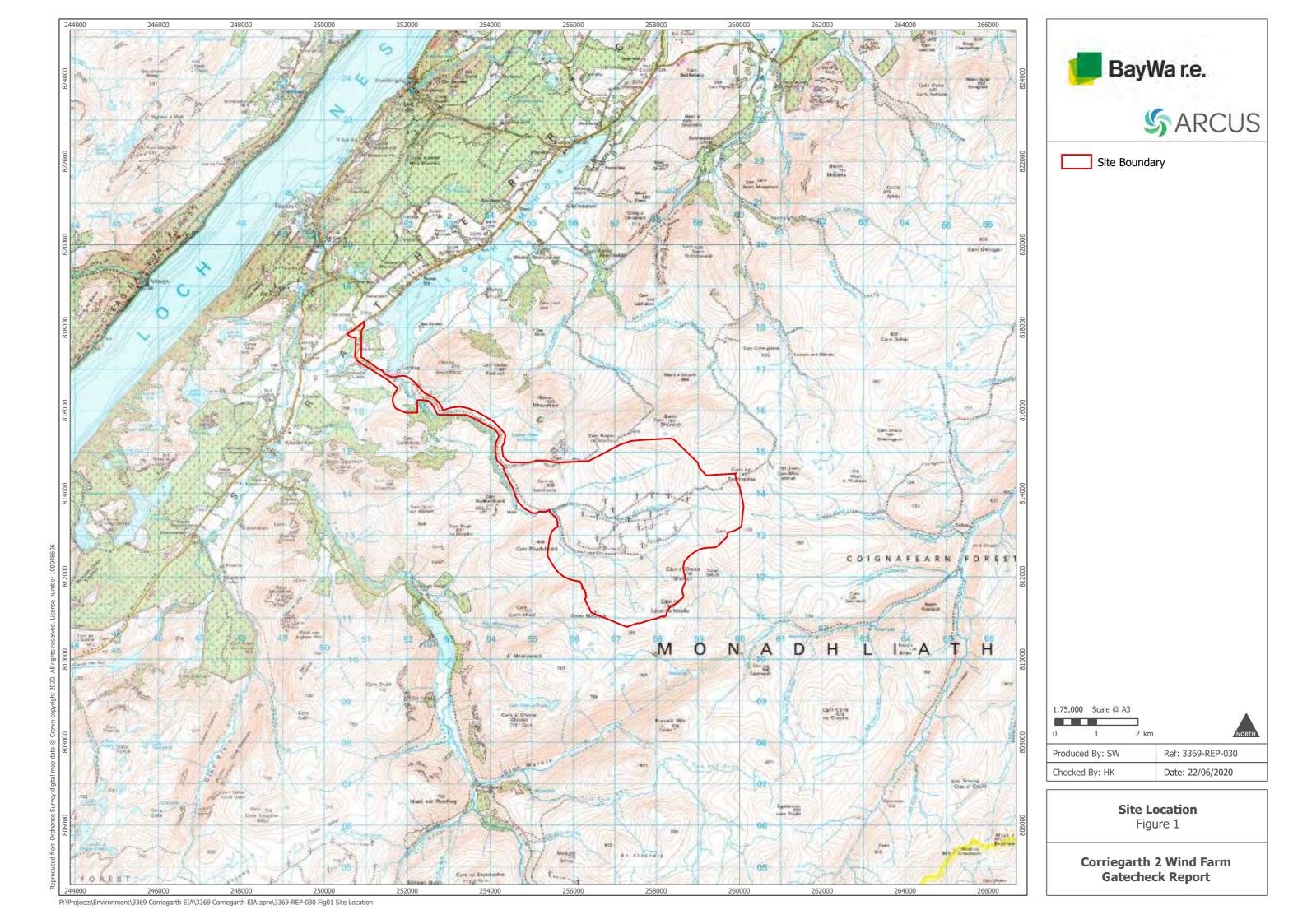
| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------------------|--|--|---|--|
| Transport Scotland | Transport Note that base traffic flows will be established and detailed within the EIA Report. Assessment to be undertaken in line with IEMA 'Guidelines for the Environmental Impact of Road Traffic' with the two threshold guidelines contained therein being used to identify the appropriate extent of the assessment area. Road links should be taken forward for assessment if: Traffic flows will increase by more than 30%; The number of HGVs will increase by more than 30%; and Traffic flows will increase by 10% or more in sensitive areas. Content that no further assessment will be required if above thresholds are not exceeded. | | Noted that IEMA Guidelines and thresholds will be applied in the assessment. The Traffic and Transport chapter of the EIA Report will assess using this methodology. | Chapter 11 - Traffic and Transport |
| Transport Scotland | Transport | Show that increased size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path. Full Abnormal Loads Assessment (ALA) report should be provided with the EIA Report that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route. | An Abnormal Load Route Assessment is being undertaken and will be presented with the Traffic and Transport chapter of the EIA Report. This will not consider structural effects as this is beyond the scope of this assessment, it is requested that assessment of structural effects is undertaken post consent and is secured through an appropriately worded condition of consent. | Chapter 11 - Traffic and Transport |

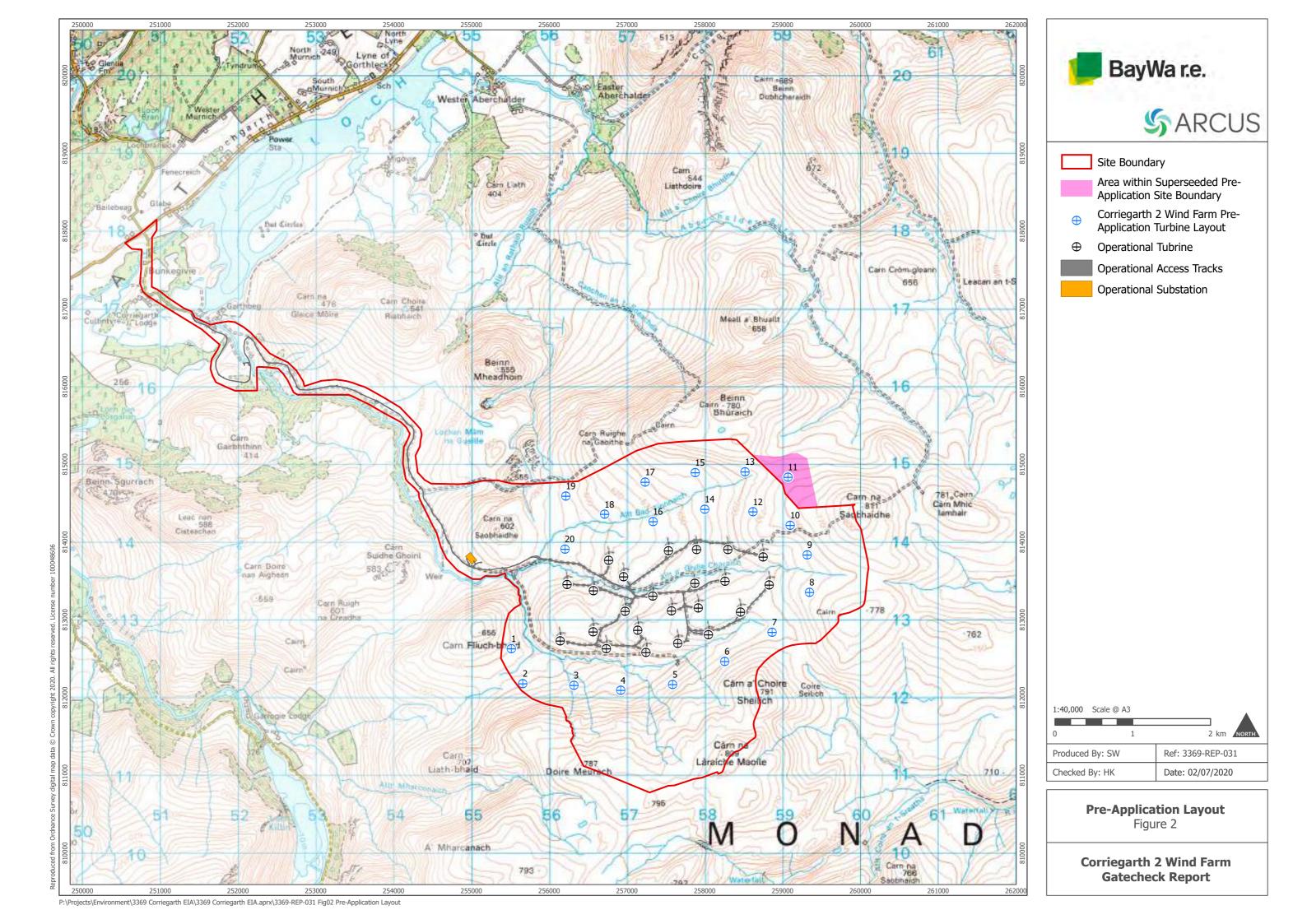


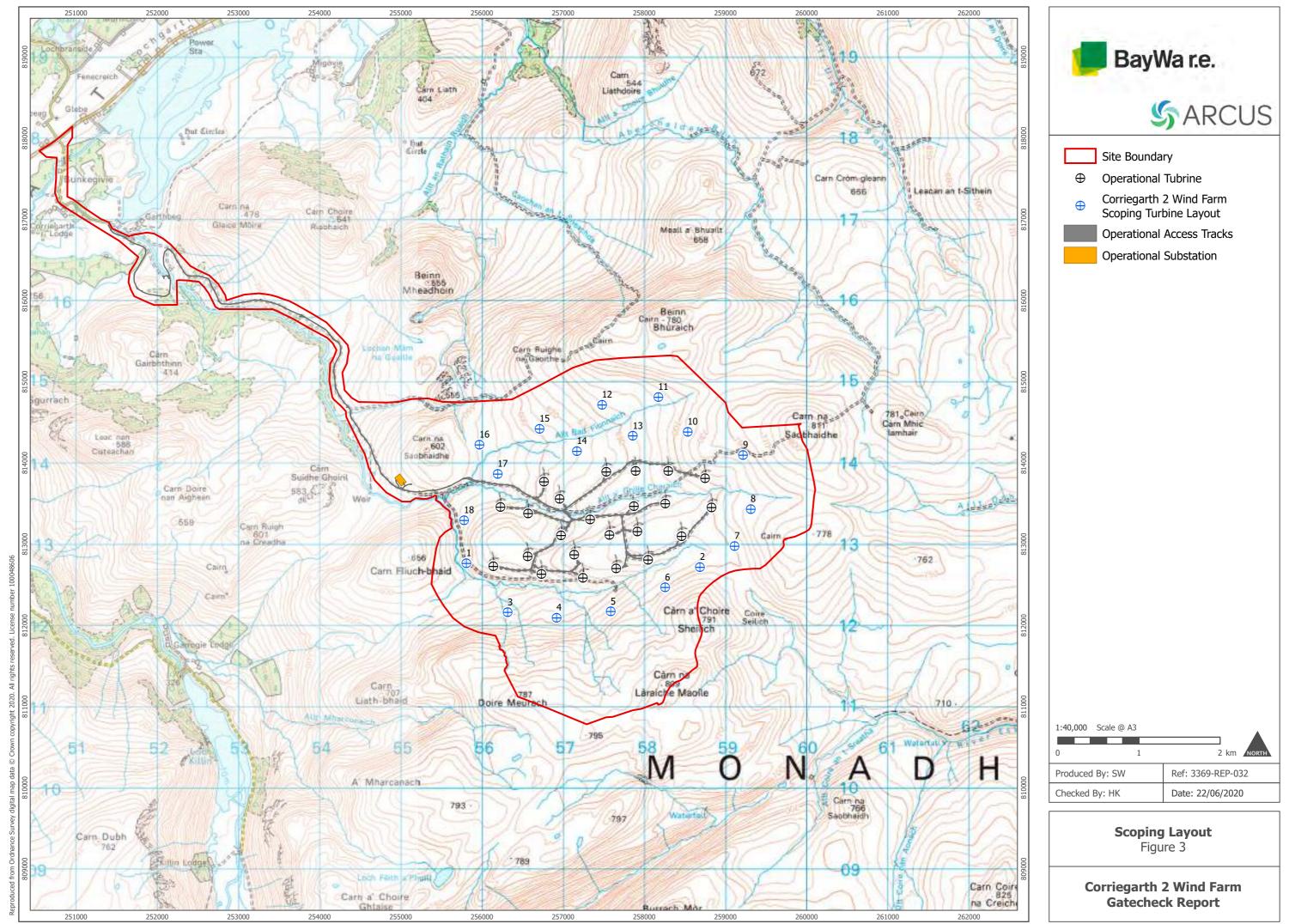
| Consultee | Discipline | Scoping Comment | Response for Gatecheck | Chapter/Section in EIA Report where comments are addressed |
|-----------------------|------------|--|---|--|
| Transport Scotland | Transport | In relation to access tracks, if there is a justifiable need to retain some form of the access route(s) through the landscape to the site, recommend that consideration is given to reducing the scale of any such track(s) and changing their form to limit their lasting visual impacts. | Access track would utilise operational Corriegarth Wind Farm track. | Chapter 11 - Traffic and Transport. |



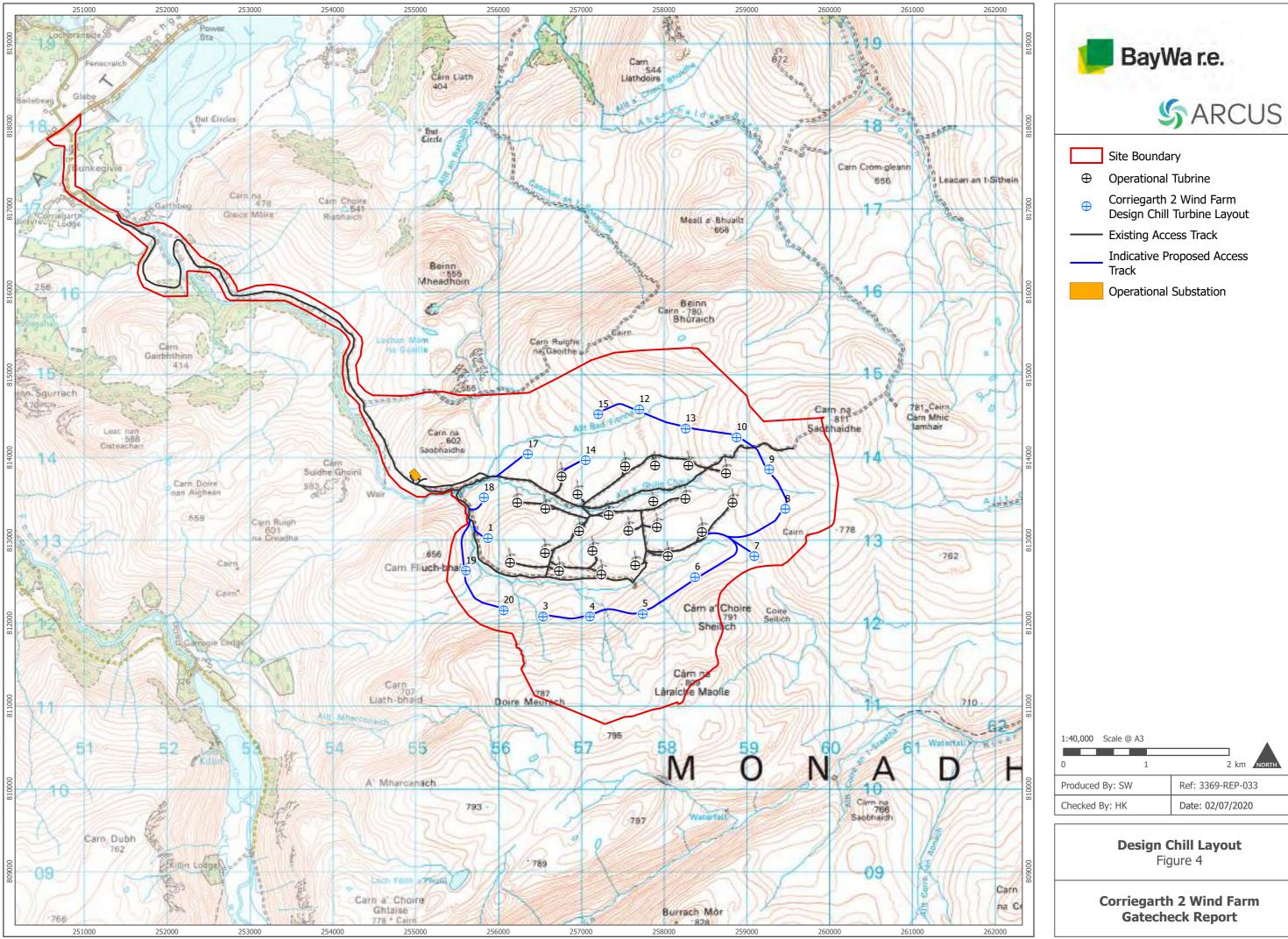
6 APPENDIX B – FIGURES







P:\Projects\Environment\3369 Corriegarth EIA\3369 Corriegarth EIA.aprx\3369-REP-032 Fig03 Scoping Layout



P:\Projects\Environment\3369 Corriegarth EIA\3369 Corriegarth EIA.aprx\3369-REP-033 Fig04 Design Chill Layout



CORRIEGARTH 2 WIND FARM

APPENDIX A6.1

LVIA ASSESSMENT METHODOLOGY

2020





A6.1 LVIA ASSESSMENT METHODOLOGY

This appendix sets out the detailed methodology used for the Corriegarth 2 Wind Farm Landscape and Visual Impact Assessment (LVIA) and Cumulative Landscape and Visual Impact Assessment (CLVIA) set out in Chapter 6: Landscape and Visual Amenity, Volume 1 of the Environmental Impact Assessment Report (EIA Report).

The methodology for the production of accompanying visualisations was based on current good practice guidance¹ as set out by NatureScot (formerly known as Scottish Natural Heritage (SNH)²), and detailed information about the approach to viewpoint photography, and ZTV and visualisation production is provided in Appendix A6.2.

Landscape and visual assessments are separate, although linked, processes. LVIA therefore considers the likely effects of a proposed development on:

- Landscape as a resource in its own right (caused by changes to the constituent elements of the landscape, its specific aesthetic or perceptual qualities and the character of the landscape); and
- Views and visual amenity as experienced by people (caused by changes in the appearance of the landscape).

LVIA deals with landscape and visual effects separately, followed by an assessment of cumulative landscape and visual effects where relevant.

A6.1.1 GUIDANCE

This methodology has been developed by Chartered Landscape Architects (Chartered Members of the Landscape Institute (CMLI)) at LUC (Land Use Consultants Ltd.), who have extensive experience in the assessment of landscape and visual effects arising from wind energy developments.

The methodology has been developed primarily in accordance with the principles contained within the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)³. NatureScot cumulative guidance⁴ also informs the approach to the assessment of cumulative landscape and visual effects in relation to onshore wind energy development.

A6.1.2 SCOPE OF AN ASSESSMENT

An LVIA considers physical changes to the landscape as well as changes in landscape character. It also considers changes to areas designated for their scenic or landscape qualities, and the visual impacts of a proposed development on publicly available views as perceived by people. In other words, in terms of visual impacts, the focus is on public views and public visual amenity. In contrast, a Residential Visual Amenity Assessment (RVAA) is a stage beyond LVIA and focusses exclusively on private views and private visual amenity. If undertaken, such an RVAA is therefore separate from, but related to the LVIA. The methodology for assessment of effects on the Residential Visual Amenity is discussed separately in a subsequent section of this appendix.

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¹ Scottish Natural Heritage (SNH). (2017). Visual Representation of Wind Farms Guidance, Version 2.2.

² Scottish Natural Heritage (SNH) rebranded in August 2020 as NatureScot. Where relevant reference is still made to SNH within this chapter in respect of guidance which remains valid and is yet to be republished etc.

³ The Landscape Institute and Institute of Environmental Management and Assessment (2013). Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. Routledge.

⁴ SNH. (2012). Guidance: Assessing the Cumulative Impact of Onshore Wind Energy Developments.

All potentially significant landscape and visual effects (including cumulative effects) are examined, including those relating to construction, operation and, where relevant, decommissioning.

Where it is judged that significant effects are unlikely to occur, the assessment of likely effects on some receptors may be 'scoped out' for an Environmental Impact Assessment (EIA) development this is usually agreed at scoping stage.

A6.1.3 ASSESSMENT METHODOLOGY

A6.1.3.1 Study Area

The study area for an LVIA is determined by the nature and scale of the development proposed and the nature of the study area (e.g. complex topography or extensive tree cover leading to visually enclosed areas may limit the extent of likely significant effects).

A6.1.3.2 Methodological Overview

The key steps in the methodology for assessing landscape and visual effects are as follows:

- the landscape of the study area is analysed, and landscape receptors identified, informed by desk and field-survey;
- the area over which the development will potentially be visible is established through the creation of an initial Zone of Theoretical Visibility (ZTV) plan⁵;
- the visual baseline is recorded in terms of the different receptors (groups of people) who may experience views of the development (informed by the initial ZTV) and the nature of their existing views and visual amenity;
- potential assessment viewpoints are selected, as advocated by GLVIA3 to represent a range of different receptors and views, in consultation with statutory consultees;
 - 'Representative viewpoints, selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ – for example, certain points may be chosen to represent the views of users of particular public footpaths and bridleways;
 - Specific viewpoints, chosen because they are key and sometimes promoted viewpoints within the landscape, including for example specific local visitor attractions, viewpoints in areas of particularly noteworthy visual and/or recreational amenity such as landscapes with statutory landscape designations, or viewpoints with particular cultural landscape associations; and
 - Illustrative viewpoints, chosen specifically to demonstrate a particular effect or specific issues, which might, for example, be the restricted visibility at certain locations' (GLVIA3, Para 6.19, Page 109).
- likely significant effects on both the landscape as a resource and visual receptors will be identified; and
- the level (and significance) of landscape and visual effects are judged with reference to the nature of the receptor (commonly referred to as the sensitivity of the receptor), which considers both susceptibility and value, and the nature of the effect (commonly referred to as the magnitude of effect), which considers a combination of judgements including size/scale, geographical extent, duration and reversibility.

⁵ A ZTV indicate areas from where a development is theoretically visible, but they cannot show what it would look like, nor indicate the nature or magnitude of landscape or visual impacts

A6.1.3.3 Direction of Effects

As required by the EIA Regulations⁶, the assessment must identify the direction of effect as either being beneficial, adverse (also referred to as positive or negative) or neutral.

The direction of landscape, visual and cumulative effects (beneficial, adverse or neutral) is determined in relation to the degree to which the proposal fits with the existing landscape character or views, and the contribution to the landscape or views that the proposed development makes, even if it is in contrast to the existing character of the landscape or views.

With regard to wind energy development, whilst there is a broad spectrum of response from the strongly positive to the strongly negative, an assessment is required to take an objective approach. Therefore, to cover the 'maximum case effect' situation, likely landscape, visual effects relating to commercial scale wind farm developments are generally assumed to be adverse (negative).

A6.1.4 METHOD FOR ASSESSING LANDSCAPE EFFECTS

As outlined in GLVIA3 'An assessment of landscape effects deals with the effects of change and development on landscape as a resource.' (GLVIA3, Para 5.1, Page 70). Changes may affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character.

An assessment of landscape effects requires consideration of the nature of landscape receptors (sensitivity of receptor) and the nature of the effect on those receptors (magnitude of effect). GLVIA3 states that the nature of landscape receptors, commonly referred to as their sensitivity, should be assessed in terms of the susceptibility of the receptor to the type of change proposed, and the value attached to the receptor. The nature of the effect on each landscape receptor, commonly referred to as its magnitude, should be assessed in terms of size and scale of effect, geographical extent, duration and reversibility.

These aspects are considered together, to form a judgement regarding the overall significance of landscape effects (GLVIA3, Figure 5.1 Page 71). The following sections set out the methodology used to evaluate sensitivity and magnitude.

A6.1.4.1 Sensitivity of Landscape Receptors

The sensitivity of a landscape receptor to change is defined as high, medium or low and is based on weighing up professional judgements regarding susceptibility and value, as set out below.

Table 6.1.1: Sensitivity of Landscape Receptors

| Sensitivity of Landscape Receptors | | | |
|------------------------------------|---|-----------------------|---|
| | Higher | \longleftrightarrow | Lower |
| Susceptibility | Attributes that make up the character of the landscape offer very limited opportunities for the accommodation of change without key characteristics being fundamentally altered by wind energy development, | ←→ | Attributes that make up the character of the landscape are resilient to being changed by wind energy development. |

⁶ The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. London: HMSO [Online] Available at: http://www.legislation.gov.uk/ssi/2017/101/contents/made (Accessed 11/08/2020)

| Sensitivity of Landscape Receptors | | | |
|------------------------------------|--|-----------------------|---|
| | Higher | \longleftrightarrow | Lower |
| | leading to a different landscape character. | | |
| Value | Landscapes with high scenic quality, high conservation interest, recreational value, important cultural associations or a high degree of rarity. Areas or features designated at a national level <i>e.g.</i> National Parks or National Scenic Areas or key features of these with national policy level protection. | ← | Landscape of poor condition and intactness, limited aesthetic qualities, or of character that is widespread. Areas or features that are not formally designated. |

Susceptibility of Landscape Receptors

Susceptibility is defined by GLVIA3 as 'the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies' (GLVIA3 paragraph 5.40).

A series of criteria are used to evaluate the susceptibility of Landscape Character Types (LCTs) or Landscape Character Areas (LCAs) to wind energy development as set out in the table below. These criteria or aspects are drawn from a range of published sources relating to wind farm development, including Siting and Designing Windfarms in the Landscape⁷ and GLVIA3.

Table 6.1.2: Aspects Influencing Susceptibility of Landscape Receptors to Wind Turbines

| Aspects Influencing Susceptibility of Landscape Receptors to Wind Turbines | | | |
|--|--|-----------------------|--|
| Characteristic/ attribute | Aspects indicating reduced susceptibility to wind energy development | + | Aspects indicating greater susceptibility to wind energy development |
| Scale | Large scale | ←→ | Small scale |
| Landform | Absence of strong topographical variety, featureless, convex or flat | ←→ | Presence of strong topographical variety or distinctive landform features |
| Landscape pattern and complexity | Simple Regular or uniform | \longleftrightarrow | Complex Rugged and irregular |
| Settlement and man- made influence | Presence of contemporary structures <i>e.g.</i> utility, | ←→ | Absence of modern development |

⁷ SNH (2017), Siting and Designing Wind Farms in the Landscape, Version 3. [Online] Available at: https://www.nature.scot/siting-and-designing-wind-farms-landscape-version-3a (Accessed 06/10/2020)

| Aspects Influencing Susceptibility of Landscape Receptors to Wind Turbines | | | | |
|--|--|-----------|--|--|
| Characteristic/ attribute | Aspects indicating reduced susceptibility to wind energy development | ←→ | Aspects indicating greater susceptibility to wind energy development | |
| | infrastructure or industrial elements | | Presence of small scale, historic or vernacular settlement | |
| Skylines | Non-prominent /screened skylines Presence of existing modern man-made features | ←→ | Distinctive, undeveloped skylines Skylines that are highly visible over large areas or exert a large influence on landscape character Skylines with important historic landmarks | |
| Inter-visibility with adjacent landscapes | Little inter-visibility with adjacent sensitive landscapes or viewpoints | ←→ | Strong inter-visibility with sensitive landscapes Forms an important part of a view from sensitive viewpoints | |
| Perceptual aspects | Close to visible or audible signs of human activity and development | ←→ | Remote from visible or audible signs of human activity and development | |

Published landscape capacity or sensitivity studies (where they exist) may be reviewed to inform the evaluation of susceptibility, in addition to fieldwork undertaken across the study area. This review includes an evaluation as to the relevance of the publication to the assessment being undertaken (*e.g.* consideration of the purpose and scope of the published studies and whether they have become out of date).

Landscape susceptibility is described as being high, medium or low.

Value of Landscape Receptors

The European Landscape Convention advocates that all landscape is of value, whether it is the subject of defined landscape designation or not: `The landscape is important as a component of the environment and of people's surroundings in both town and country and whether it is ordinary landscape or outstanding landscape.' The value of a landscape receptor is recognised as being a key contributing factor to the sensitivity of landscape receptors.

The value of landscape receptors is determined with reference to:

- Review of relevant designations and the level of policy importance that they signify (such as landscapes designated at international, national or local level); and/or
- Application of criteria that indicate value (such as scenic quality, rarity, recreational value, representativeness, conservation interests, perceptual aspects and artistic associations) as described in GLVIA3, paragraphs 5.44 - 5.47.

Internationally and nationally designated landscapes would generally indicate landscape of higher value whereas those without formal designation (such as a widespread or common landscape type without high scenic quality) are likely to be of lower value, bearing in mind that all landscapes are valued at some level. There is however variation across both designated and undesignated areas, and so judgements regarding value are also informed by fieldwork.

Landscape value is described as being high, medium or low.

A6.1.4.2 Magnitude of Landscape Effect

The overall judgement of magnitude of landscape effect is based on combining professional judgements on size and scale, geographical extent, duration and reversibility. Further information on the criteria is provided below.

Size and Scale

For landscape elements/features this depends on the extent of existing landscape elements that would be lost or changed, the proportion of the total extent that this represents, and the contribution of that element to the character of the landscape.

In terms of landscape character, this reflects the degree to which the character of the landscape would change as a result of removal or addition of landscape components, and how the changes would affect key characteristics.

The size and scale of landscape change is described as being large, medium, small, or barely perceptible.

Geographical Extent

The geographical extent over which the landscape change would arise is described as being large (scale of the landscape character type, or widespread, affecting several landscape types or character areas), medium (more immediate surroundings) or small (site level).

Duration

GLVIA3 states that 'Duration can usually be simply judged on a scale such as short term, medium term or long term.' For the purposes of the assessment, duration is often determined in relation to the phases of the proposed development, as follows:

- Short-term effects are those that occur during construction, and may extend into the early part of the operational phase, e.g. construction activities, generally lasting 0 - 5 years;
- Medium-term effects are those that occur during part of the operational phase, generally lasting 5 - 10 years; and
- Long-term effects are those which occur throughout the operational phase (in this instance 30 years), e.g. presence of turbines, or are permanent effects which continue after the operational phase, generally lasting over 10 years.

Reversibility

In accordance with the principles contained within GLVIA3, reversibility is reported as reversible, partially reversible or irreversible (i.e. permanent), and is related to whether the change can be reversed at the end of the phase of development under consideration (i.e. at the end of construction or at the end of the operational lifespan of the development).

Judgements on the magnitude of landscape change (nature of landscape effect) are recorded as high, medium, low or barely perceptible and are quided by the table below.

Table 6.1.3: Magnitude of Landscape Effect

| Magnitude of Landscape Effect | | | | |
|-------------------------------|--|-----------------------|---|--|
| | Higher | \longleftrightarrow | Lower | |
| Size/Scale | Extensive loss of landscape features and/or elements, and/or change in, or loss of key landscape characteristics, and/or | \longleftrightarrow | Limited loss of landscape features and/or elements, and/or change in or loss of | |

| Magnitude of Landscape Effect | | | | |
|-------------------------------|---|-----------------------|--|--|
| | Higher | \longleftrightarrow | Lower | |
| | creation of new key landscape characteristics | | some secondary landscape characteristics | |
| Geographical Extent | Change in landscape features and/or character extending considerably beyond the immediate site and potentially affecting multiple landscape character types/areas | + | Change in landscape features and/or character extending contained within or local to the immediate site and affecting only a small part of the landscape character type/area | |
| Duration | Changes experienced for a period of around 10 years or more | \longleftrightarrow | Changes experienced for a shorter period of up to 5 years | |
| Reversibility | Change to features, elements or character which cannot be undone or are only partly reversible after a long period | \longleftrightarrow | A temporary landscape change which is largely reversible following the completion of construction, or decommissioning of the development | |

A6.1.4.3 Judging Levels of Landscape Effect and Significance

The final step in the assessment requires the judgements of sensitivity and magnitude of effect to be combined to make an informed professional assessment on the significance of each landscape effect (GLVIA3, Figure 5.1, Page 71).

There may be a complex relationship between the value attached to a landscape and the susceptibility of the landscape to a specific change. Therefore the rationale for judgements on the sensitivity of landscape receptors needs to be clearly set out for each receptor. Further information on the criteria are provided below. It should be noted that whilst landscape designations at an international or national level are likely to be accorded the highest value, it does not necessarily follow that such landscapes all have a high susceptibility to all types of change, and conversely, undesignated landscapes may also have high value and susceptibility to change (GLVIA3, Page 90).

Although a numerical or formal weighting system is not applied, consideration of the relative importance of each aspect is made to feed into the overall decision. Levels of effect are identified as negligible, minor, moderate or major where moderate and major effects are considered significant in the context of the EIA Regulations.

This determination requires the application of professional judgement and experience to take on board the many different variables which need to be considered, and which are given different weight according to site-specific and location-specific considerations in every instance. Judgements are made on a case by case basis, guided by the principles set out in Diagram 1 below. A rigid matrix-type approach, which does not take on board professional judgement and experience, and where the level of effect is defined simply based on the level of sensitivity (nature of receptor) combined with the magnitude of change (nature of effect), is not used. As such, the conclusion on the level of effect is not always the same.

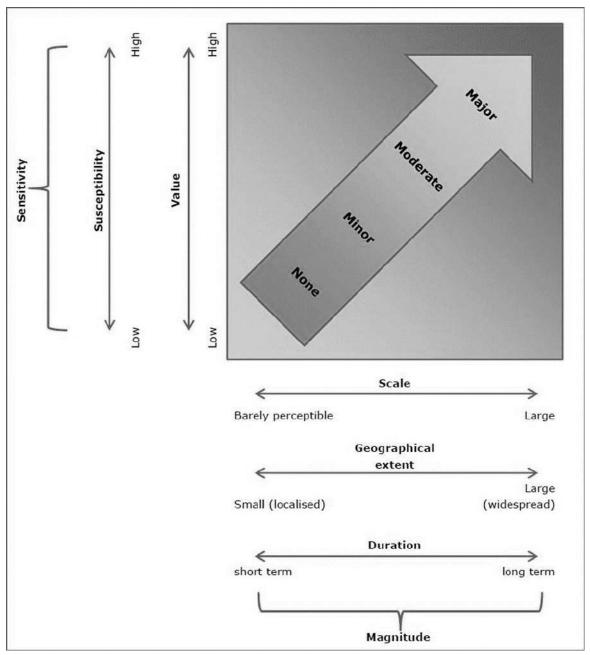


Diagram 1: Judging levels of effect – Landscape or Visual (including cumulative)

A6.1.5 METHOD FOR ASSESSING VISUAL EFFECTS

A6.1.5.1 Significance of Visual Effects

As outlined in GLVIA3 'An assessment of visual effects deals with the effects of change and development on views available to people and their visual amenity' (GLVIA3, Para 6.1, Page 98). Changes in views may be experienced by people at different locations within the study area including from static locations (normally assessed using representative viewpoints) and whilst moving through the landscape (normally referred to as sequential views, e.g. from roads and walking routes).

Visual receptors are individuals or groups of people who may be affected by changes in views and visual amenity. They are usually grouped by their occupation or activity (e.g. residents, motorists, recreational users) and the extent to which their attention is focused on the view (GLVIA3, Paras. 6.31 - 6.32, Page 113).

GLVIA3 states that the sensitivity of visual receptors should be assessed in terms of the susceptibility of the receptor to change in views and/or visual amenity and the value attached to particular views. The magnitude of effect should be assessed in terms of the size and scale, geographical extent, duration and reversibility of the effect.

These aspects are considered together, to form a judgement regarding the overall significance of visual effect (GLVIA3, Figure 6.1 Page 99). The following sections set out the methodology used to evaluate sensitivity and magnitude.

A6.1.5.2 Sensitivity of Visual Receptor

The sensitivity of a visual receptor to change is defined as high, medium or low and is based on weighing up professional judgements regarding susceptibility and value, and each of their component considerations, as set out in the below.

Table 6.1.4: Sensitivity of Visual Receptors

| Sensitivity of Visual Receptors | | | | |
|---------------------------------|---|-----------------------|---|--|
| | Higher | \longleftrightarrow | Lower | |
| Susceptibility | Viewers whose attention or interest is focused on their surroundings, including communities/ individual residential receptors/ people engaged in outdoor recreation/ visitors to heritage assets or other attractions where views of surrounding area an important contributor. | | People whose attention is not on their surroundings (and where setting is not important to the quality of working life) such as commuters/ people engaged in outdoor sports/ people at their place of work. | |
| Value | Views may be recorded in management plans, guide books, and/or which are likely to be experienced by large numbers of people. Views may be associated with nationally designated landscapes; local authority designated landscapes; designed views recorded in citations for historic parks, gardens/scheduled monuments etc. | ←→ | Views which are not documented or protected. Views which are more incidental, and less likely to be associated with somewhere people travel to or stop, or which may be experienced by smaller numbers of people. | |

Susceptibility of Visual Receptor

The susceptibility of visual receptors to changes in views/visual amenity is a function of the occupation or activity of people experiencing the view and the extent to which their attention is focused on views (GLVIA 3, para 6.32). This is recorded as high, medium or low informed by the table below.

| Table 6.1.5: Susceptibility of Visual Receptors |
|---|
|---|

| Susceptibility of Visual Receptors | | | | | |
|--|---|---|--|--|--|
| High | Medium | Low | | | |
| Viewers whose attention or interest is focussed on their surroundings, including: communities where views contribute to the landscape setting enjoyed by residents; people engaged in outdoor recreation (including users of cycle routes, footpaths and public rights of way whose interest is likely to be focused on the landscape); visitors to heritage assets or other attractions where views of surroundings are an important contributor to experience; and visitors to formal or promoted stopping places on scenic or tourist routes. | People travelling in vehicles on scenic routes and tourist routes, where attention is focused on the surrounding landscape, but is transitory; and People at their place of work whose attention is focused on the surroundings and where setting is important to the quality of working life. | People travelling more rapidly on more major roads, rail or transport routes (not recognised as scenic routes); People engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape; and People at their place of work whose attention is not on their surroundings (and where setting is not important to the quality of working life). | | | |

Value of View or Visual Amenity

GLVIA3 also requires evaluation of the value attached to the view or visual amenity and relates this to planning designations and cultural associations (GLVIA3, Para. 6.37, Page 114).

Recognition of the value of a view is determined with reference to:

- planning designations specific to views;
- whether it is recorded as important in relation to designated landscapes (such as views specifically mentioned in the special qualities of a National Scenic Area);
- whether it is recorded as important in relation to heritage assets (such as designed views recorded in citations of Gardens and Designed Landscapes (GDL) or views recorded as of importance in Conservation Area Appraisals); and
- the value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment and references to them in literature and art.

A designated viewpoint or scenic route advertised on maps and in tourist information, or which is a significant destination in its own right, such as a Munro summit, is likely to indicate a view of higher value. High value views may also be recognised in relation to the special qualities of a designated landscape or heritage asset, or it may be a view familiar from photographs or paintings.

Views experienced from viewpoints or routes not recognised formally or advertised in tourist information, or which are not provided with interpretation or, in some cases, formal access are likely to be of lower value.

Judgements on the value of views or visual amenity are recorded as high, medium or low.

A6.1.5.3 Magnitude of Visual Effect

The overall judgement of magnitude of visual effect (nature of visual effect) is based on weighing up professional judgements on size and scale, geographical extent, duration and reversibility. Further information on the criteria is provided below.

Size and Scale

The size and scale of a visual change depends on:

- the scale of the change in the view with respect to the loss or addition of features in the view and changes in its composition, including the proportion of the view occupied by the proposed development;
- the degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture; and
- the nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses.

All changes are assumed to be during winter, representing a 'maximum case effect' or 'worst case effect' scenario with minimal screening by vegetation and deciduous trees. Note that wireframes and ZTVs prepared to illustrate potential visual effects are calculated on the basis of bare ground and therefore demonstrate the maximum extent of visibility possible, in the absence of buildings or vegetation. Where forestry is present, consideration is given to felling regimes if levels of screening by forestry are likely to change notably during the lifetime of the proposed development.

In this assessment size/scale of visual change is described as being large, medium, small or barely perceptible.

Geographical Extent

The geographical extent of a visual change records the extent of the area over which the changes will be visible *e.g.* whether this is a unique viewpoint from where the proposed wind farm can be glimpsed, or whether it represents a large area from which similar views are gained. Geographical extent is described as being large, medium or small.

Duration

The duration of visual effects is reported as short-term, medium-term or long-term, as defined for the duration of landscape effects (see above).

Reversibility

Reversibility is reported as irreversible (*i.e.* permanent), partially reversible or reversible, and is related to whether the visual change can be reversed at the end of the phase of development under consideration (*i.e.* at the end of construction or at the end of the operational lifespan of the development). Operational visual effects are generally considered to be partially reversible as the decommissioning phase will remove turbines and most infrastructure at the end of the operational phase.

Judgements on the magnitude of visual effect are recorded as high, medium, low or barely perceptible guided by the table below.

Table 6.1.6: Magnitude of Visual Effects

| Magnitude of Visual Effects | | | | |
|-----------------------------|--|-----------------------|---|--|
| | Higher | \longleftrightarrow | Lower | |
| Size/Scale | A large visual change resulting from the proposed development is the most notable aspect of the view, perhaps as a result of the development being in close proximity, or because a substantial part of the view is affected, or because the development introduces a new focal point and/or provides contrast with the existing view and/or changes the scenic qualities of the view. | • | A small or some visual change resulting from the proposed development as a minor or generally unnoticed aspect of the view, perhaps as a result of the development being in the distance, or because only a small part of the view is affected, and/or because the development does not introduces a new focal point or is in contrast with the existing view and/does not change the scenic qualities of the view. | |
| Geographical Extent | The assessment location is clearly representative of similar visual effects over an extensive geographic area. | ←→ | The assessment location clearly represents a small geographic area. | |
| Duration | Visual change experienced over around 10 years or more | ←→ | Visual change experienced over a short period of up to 5 years. | |
| Reversibility | A permanent visual change which is not reversible or only partially reversible following decommissioning of the proposed development. | ←→ | A temporary visual change which is largely reversible following the completion of construction or decommissioning of the proposed development. | |

A6.1.5.4 Direction of Visual Effects

The direction of visual effects (beneficial, adverse or neutral) is determined in relation to the degree to which the proposal fits with the existing view and the contribution to the view that a proposed development makes, even if it is in contrast to the existing character of the view.

With regard to wind energy development there is a broad spectrum of response from the strongly positive to the strongly negative. However, to cover the 'maximum case effect' situation, potential visual effects relating to commercial scale wind energy developments are generally assumed to be adverse.

A6.1.5.5 Judging the Level of Visual Effect and Significance

As for landscape effects, the final step in the assessment requires the judgements of sensitivity of visual receptor and magnitude of visual effect to be combined to make an informed professional assessment on the significance of each visual effect.

The evaluations of the individual aspects set out above (susceptibility, value, size and scale, geographical extent, duration and reversibility) are considered together to provide an overall profile of each identified visual effect. An overview is then taken of the

distribution of judgements for each aspect to make an informed professional assessment of the overall level of effect, drawing on good practice guidance provided in GLVIA3.

The sensitivity of visual receptors may involve a complex relationship between a visual receptor's (*e.g.* people's) susceptibility to change and the value attached to a view. Therefore, the rationale for judgements of sensitivity is clearly set out for each receptor in relation to both its susceptibility (to the type of change proposed) and its value. Further information on the criteria is provided below.

A rigid matrix-type approach, where the level of visual effect is defined simply based on the level of sensitivity combined with the magnitude of effect is not used. As such, the conclusion on the level of effect is not always the same. Although a numerical or formal weighting system is not applied, consideration of the relative importance of each aspect is made to feed into the overall decision. Levels of visual effect are identified as negligible, minor, moderate or major where moderate and major visual effects are considered significant in the context of the EIA Regulations.

This determination requires the application of professional judgement and experience to take on board the many different variables which need to be considered, and which are given different weight according to site-specific and location-specific considerations in every instance. As such, the conclusion on the level of effect is not always the same. Judgements are made on a case by case basis, guided by the same principles as set out in Diagram 1 above.

A6.1.6 CUMULATIVE LANDSCAPE AND VISUAL IMPACT ASSESSMENT (CLVIA)

The aim of a Cumulative Landscape and Visual Impact Assessment (CLVIA) is to 'describe, visually represent and assess the ways in which a proposed windfarm would have additional impacts when considered together with other existing, consented or proposed windfarms' (Para. 55, SNH, 2012).

The cumulative assessment therefore focuses on the additional cumulative change which may result from the introduction of a proposed development. The cumulative assessment may also make reference to *total* (also referred to as combined) cumulative effects, where these have the potential to be significant. A cumulative assessment may also consider the potential interactions between different types of development (*e.g.* transmission infrastructure, other energy generation stations or other built development) if these are likely to result in similar landscape and visual impacts.

As with an LVIA, a CLVIA deals with cumulative landscape and visual effects separately.

A6.1.6.1 Differences between LVIA and CLVIA

Although both LVIA and CLVIA look at the effects of a proposed development on the landscape and on views, there are differences in the baseline against which the assessments are carried out.

For the LVIA, the baseline includes existing wind farm developments which are present in the landscape at the time of undertaking the assessment, which may be either operational or under construction as they form a part of the baseline situation. Their presence has the potential to influence the assessment of effects on landscape character and the assessment of effects on views. For the CLVIA the baseline is partially speculative and includes (in addition to existing wind farms):

- wind farms which have been granted planning consent but are not yet constructed (consented); and
- submitted valid wind farm applications which are currently awaiting determination by the relevant consenting authority, including those at appeal and in some instances those currently at scoping when specifically requested (proposed).

The cumulative assessment considers the operational and under construction sites, as well as consented and proposed sites, and differs from that contained in the assessment of landscape effects and the assessment of visual effects in that it focuses specifically on the cumulative impact of the Proposed Development in association with all other wind energy developments and assesses the detailed relationship between them.

Where the magnitude of change that would occur as a result of the introduction of the Development in the LVIA is identified as either low or barely perceptible, potential cumulative effects are often not assessed in the cumulative assessment as it is considered that such an addition would not give rise to a significant cumulative effect.

A6.1.6.2 Types of Cumulative Effects

Assessing the Cumulative Impact of Onshore Wind Energy Developments⁸ states that `cumulative landscape effects can impact on either the physical fabric or character of the landscape, or any special values attached to it' (Para. 48, SNH, 2012).

Three types of cumulative effects on visual amenity are considered in the assessment: combined, successive and sequential:

- Combined effects occur where a static viewer is able to view two or more wind farms from a viewpoint within the viewers' same arc of vision;
- Successive effects occur where a static viewer is able to view two or more wind farms from a viewpoint, but needs to turn to see them; and
- Sequential effects occur when a viewer is moving through the landscape from one area to another, for instance when a person is travelling along a road or footpath, and is able to see two or more wind farms at the same, or at different times as they pass along the route. Frequently sequential effects occur where wind farms appear regularly, with short time lapses between points of visibility. Occasionally sequential effects occur where long periods of time lapse between views of wind farms, depending on speed of travel and distance between viewpoints.

A6.1.7 ASSESSING CUMULATIVE EFFECTS

A6.1.7.1 Assessment Methodology for CLVIA

The CLVIA considers the potential effects of the addition of a proposed development, against a baseline landscape that includes wind farms that may or may not be present in the landscape in the future, i.e. wind farms that are consented but not yet built, and/or undetermined planning applications. The wind farms included in each scenario are assumed to be present in the landscape for the purposes of the CLVIA.

The methodology for the CLVIA follows that of the LVIA, which considers the introduction of a proposed development to a baseline which includes existing (operational and under construction) wind farms. The size and scale of cumulative change focuses on:

- the pattern and arrangement of wind farms in the landscape or view, e.g. developments seen in one direction or part of the view (combined views), or seen in different directions (successive views in which the viewer must turn) or developments seen sequentially along a route;
- the relationship between the scale of the wind farms, including turbine size and number, and if wind farms appear balanced in views in terms of their composition, or at odds with one another;

⁸ SNH. (2012). Assessing the cumulative impact of onshore wind energy developments. [Online] Available at: https://www.nature.scot/guidance-assessing-cumulative-impact-onshore-wind-energy-developments (Accessed 02 March 2020)

- the position of the wind farms in the landscape, *e.g.* in similar landscape or topographical context;
- the position of the wind farms in the view, *e.g.* on the skyline or against the backdrop of land; or how the proposed development will be seen in association with another development (separate, together, behind etc.); and
- the distances between wind farms, and their distances from the viewer.

A6.1.7.2 Significance of Cumulative Effects

As for a LVIA, judging the significance of cumulative landscape and visual effects requires consideration of the sensitivity and the magnitude of effect on those receptors. The following sections set out the methodology applied for the assessment of cumulative effects for both landscape and visual receptors and explain the terms used.

A6.1.8 ASSESSING CUMULATIVE LANDSCAPE EFFECTS

A6.1.8.1 Sensitivity

An assessment of cumulative landscape effects requires consideration of the sensitivity of the landscape receptors. This requires consideration of susceptibility and value and is as recorded in the assessment.

A6.1.8.2 Magnitude of Cumulative Landscape Effects

Similar to the methodology applied for an LVIA, the magnitude of cumulative landscape effect (nature of cumulative landscape effect) is based on combining professional judgements on size and scale, geographical extent, duration and reversibility. Judgements on the magnitude of cumulative landscape effect (nature of cumulative visual effect) are recorded as high, medium or low.

Size and Scale

The size/scale of cumulative landscape change is the additional influence the proposed development has on the characteristics and character of the area assuming the other wind farm developments considered in the CLVIA baseline scenarios are already present in the landscape. This is influenced by:

- how the proposal fits with existing pattern of cumulative wind farm development, including the relationship to landscape character types and areas; and
- the siting and design of the proposed development in relation to other existing and proposed wind farm developments (including distance between wind farms, composition, size and scale).

Geographical Extent

As for the LVIA, the geographical extent over which the cumulative landscape change will be experienced is described as being large (scale of the landscape character type, or widespread, affecting several landscape types or character areas), medium (immediate surroundings) or small (site level).

Duration & Reversibility

For the purpose of the cumulative landscape assessment consideration of the judgements of the duration and reversibility of landscape effects are as recorded in the assessment.

Judgements on the magnitude of cumulative landscape effect are recorded as high, medium or low.

A6.1.8.3 Levels of Cumulative Landscape Effect and Significance

The final step in the assessment of cumulative landscape effects requires the judgements of sensitivity and magnitude of cumulative landscape effect to be combined to make an informed professional assessment on the significance of each cumulative landscape effect.

As for the LVIA the levels of cumulative landscape effect are described as negligible, minor, moderate or major where moderate and major cumulative landscape effects are considered significant in the context of the EIA Regulations.

More significant effects are likely where:

- The proposed development extends or intensifies a landscape effect;
- The proposed development 'fills' an area such that it alters the landscape resource;
 and / or
- The interaction between the proposed development and other wind farm developments means that the total effect on the landscape is greater than the sum of its parts.

GLVIA 3 states `The most significant cumulative landscape effects are likely to be those that would give rise to changes in the landscape character of the study area of such an extent as to have major effects on its key characteristics and even, in some cases, to transform it into a different landscape type. This may be the case where the project being considered itself tips the balance through its additional effects. The emphasis must always remain on the main project being assessed and how or whether it adds to or combines with the others being considered to create a significant cumulative effect (para 7.28 GLVIA 3).

This determination of cumulative landscape effects requires the application of professional judgement and experience to take on board the many different variables which need to be considered, and which are given different weight according to site-specific and location-specific considerations in every instance. Judgements are made on a case by case basis.

A6.1.9 ASSESSING CUMULATIVE VISUAL EFFECTS

A6.1.9.1 Sensitivity

The assessment of the significance of cumulative visual effects requires consideration of the sensitivity of the visual receptors. This requires consideration of susceptibility and value and is as recorded in the assessment.

A6.1.9.2 Magnitude of Cumulative Visual Effects

As for cumulative landscape effects and the methodology for the LVIA, the magnitude of cumulative visual effect (nature of cumulative visual effect) is based on combining professional judgements on size and scale; geographical extent; duration and reversibility. Judgements on the magnitude of cumulative visual effect (nature of cumulative visual effect) are recorded as high, medium, low or barely perceptible.

Size and Scale

The size/scale of cumulative change to views depends on the additional influence the proposed development has on views assuming the other wind farm developments are already present in the landscape. This is influenced by:

 Whether the proposed development introduces development into a new part of the view so that the proportion of the developed part of the view increases;

- the relationship between the proposed development and other wind farm developments in terms of design, size and layout;
- the apparent visual relationship of cumulative wind farm developments to landscape character types and or landscape character areas; and/or
- in the case of magnitude of change to routes, the relative duration of views of wind farm developments from routes.

There has to be clear visibility of more than one wind farm development, of which one must be the proposed development, for there to be a cumulative effect (given this is an assessment of the effects of the proposed development and not a broader CLVIA of combined cumulative effects or capacity study). Where the proposed development is clearly visible and other wind farm developments are not, the effect is likely to be the same as recorded in the assessment (*i.e.* the effect is not a cumulative effect).

Geographical Extent

As for the LVIA, the geographical extent of cumulative visual changes records the extent of the area over which the changes will be visible *e.g.* whether this is a unique viewpoint from where the proposed wind farm can be glimpsed, or whether it represents a large area from which similar views are gained from large areas. Geographical extent is described as being large, medium or small.

Duration & Reversibility

For the purpose of the cumulative visual assessment consideration of the judgements of the duration and reversibility of visual effects are as recorded in the assessment.

A6.1.9.3 Levels of Cumulative Visual Effect and Significance

The final step in the assessment of cumulative visual effects requires the judgements of sensitivity and magnitude of cumulative visual effect to be combined to make an informed professional assessment on the significance of each cumulative visual effect.

As for the LVIA the levels of cumulative visual effect are described as negligible, minor, moderate or major where moderate and major cumulative visual effects are considered significant in the context of the EIA Regulations.

The evaluations of susceptibility, value, size and scale, geographical extent, duration and reversibility are considered together to provide an overall profile of each identified visual effect. An overview is taken of the distribution of judgements for each aspect to make an informed professional assessment of the overall level of each visual effect, drawing on guidance provided in GLVIA3. Levels of effect are identified as negligible, minor, moderate or major where moderate and major visual effects are considered significant in the context of the EIA Regulations.

More significant effects are likely where:

- the proposed development extends or intensifies a visual effect;
- the proposed development 'fills' an area such that it alters the view/ visual amenity;
- the interaction between the proposed development and other developments means that the total visual effect is greater than the sum of its parts; and/or
- the proposed development will lengthen the time over which effects are experienced (sequential effects).

This determination of cumulative visual effects requires the application of professional judgement and experience to take on board the many different variables which need to be considered, and which are given different weight according to site-specific and location-specific considerations in every instance. Again, as for the assessment of landscape and visual effects, judgements are made on a case by case basis, guided by the same principles as set out in Diagram 1 above.

A6.1.10RESIDENTIAL VISUAL AMENITY

A6.1.10.1 Background

The LI published Residential Visual Amenity Assessment (RVAA) guidance⁹ in early 2019 setting out the background and approach to the assessment of potential effects on residential visual amenity. The guidance states that "Residential Visual Amenity Assessment (RVAA) is a stage beyond LVIA and focusses exclusively on private views and private visual amenity." (Foreword, Page 2).

This is reinforced by the guidance provided in GLVIA3, which states; "Effects of development on private property are frequently dealt with mainly through 'residential amenity assessments'. These are separate from LVIA although visual effects assessment may sometimes be carried out as part of a residential amenity assessment, in which case this will supplement and form part of the normal LVIA for a project. Some of the principles set out here for dealing with visual effects may help in such assessments but there are specific requirements in residential amenity assessment." (Para. 6.17, Page 107 and 109).

It is also important to note that residential visual amenity is only one component of residential amenity and should be considered in conjunction with assessments of potential effects on the other components of residential amenity including noise, dust, access to daylight, vibration and electromagnetic field etc. and which may otherwise be referred to collectively as 'living conditions'.

With respect to visual effects, the focus of LVIA is on public views and public visual amenity which are given due consideration in the planning process. In respect of private views and visual amenity, it is widely accepted that no one has 'a right to a view', including situations where the visual amenity of a property is judged to be significantly affected by a proposed development. As a consequence, views from private residences are not a 'material consideration' in the determination of an application for planning or associated consents. However, in instances where the views of development from a property or its curtilage are judged to be so overbearing or unavoidable in key/principal views that they become a material planning consideration which is of greater public interest, they may be considered in the planning balance by a determining authority or decision maker.

GLVIA3 provides further clarification of the differences between LVIA and RVAA: "The issue of whether residents should be included as visual receptors and residential properties as private viewpoints has been discussed in Paragraph 6.17. If discussion with the competent authority suggests that they should be covered in the assessment of visual effects it will be important to recognise that residents may be particularly susceptible to changes in their visual amenity - residents at home, especially using rooms normally occupied in waking or daylight hours, are likely to experience views for longer than those briefly passing through an area. The combined effects on a number of residents in an area may also be considered, by aggregating properties within a settlement, as a way of assessing the effect on the community as a whole. Care must, however, be taken first to ensure that this really does represent the whole community and second to avoid double counting of the effects". (Para. 6.36, Page 114).

The RVAA guidance introduces an approach to considering a potential 'Residential Visual Amenity Threshold', beyond which effects may be of "such nature and/or magnitude that it potentially affects 'Living Conditions' or residential Amenity" (Para. 2.1, Page 5).

The guidance highlights that "LVIA prepared in accordance with GLVIA3 provides an appropriate starting point for a RVAA." (Para. 2.4, Page 5), and recommends four step approach (Figure 1 RVAA Process, page 7) and which draws heavily on the GLVIA3

⁹ The Landscape Institute (February 2019), Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA). [Online] Available at: https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstituteorg/2019/03/tgn-02-2019-rvaa.pdf (Accessed 06/10/2020)

principles and process. The first three steps of the approach "fall broadly within the normal scope of LVIA consisting of an assessment of the magnitude and significance of visual effect (in the EIA context) and change to visual amenity likely to be experienced by occupants at those individual residential properties which were identified" (Para. 3.2, Page 6). The fourth step "requires a further assessment of change to visual amenity examining whether the Residential Visual Amenity Threshold is likely to be, or has been, reached. Whether or not this final step is engaged depends on the circumstances specific to the case." (Para. 3.3, Page 6).

A6.1.10.2 Approach to Consideration of Visual Effects from Residential Properties

As set out above it is important to note that the assessment of effects on residential visual amenity is often distinctly separate from the assessment of visual effects as covered in a standard LVIA. Nevertheless, in order to determine whether more detailed consideration of effects on views and visual amenity from residential properties is required, in the form of an RVAA, potential effects on views and visual amenity from residential properties in closest proximity to the Development, experienced during construction and operation, has been undertaken.

It is this distinction between LVIA and RVAA which has informed the approach to considering potential effects on views and visual amenity in relation to the introduction of the Development, and "In any event RVAA should be considered supplementary to LVIA following on from, and informed by, the latter's findings and conclusions." (Para. 3.3, Page 6).

In order to establish whether visual effects are of such magnitude that they require further consideration as part of a more detailed RVAA (final fourth step) and thus warrant material consideration within the planning balance, it is important to determine whether these effects make the property 'an unattractive place to live'. Potential significant adverse effects on views and visual amenity, in the context of the EIA Regulations, experienced by people at their place of residence as a result of introducing a new development are not uncommon, but in themselves may not trigger further consideration in the planning balance as a 'material consideration'.

As outlined in the RVAA guidance, "Determining whether the threshold has been reached requires informed professional judgement. It is the process by which informed professional judgement is engaged to reach a conclusion regarding the Residential Visual Amenity Threshold that is the subject of this Technical Guidance Note." (Para. 2.2, Page 5), informed by the "LVIA findings of significant (adverse) effects on outlook and /or on visual amenity at a residential property do not automatically imply the need for a RVAA. However, for properties in (relatively) close proximity to a development proposal, and which experience a high magnitude of visual change, a RVAA may be appropriate, and may be required by the determining / competent authority." (Para. 2.5, Page 5).

In line with Step 3 of the RVAA guidance, the consideration of visual effects from residential properties in the LVIA therefore concludes "by identifying which properties should be assessed further in the final step in order to reach a judgement regarding the Residential Visual Amenity Threshold." (Para. 4.16, Page 12). Typically, this will be limited to those properties judged to experience a high magnitude of visual change, resulting in major significant adverse effects, as a consequence of the introduction of the Development.



CORRIEGARTH 2 WIND FARM

APPENDIX A6.2

ZTV MAPPING AND VISUALISATION METHODOLOGY

2020





A6.2 ZTV MAPPING AND VISUALISATION METHODOLOGY

This appendix sets out the approach to the production of visualisations which accompany the Corriegarth 2 Wind Farm Landscape and Visual Impact Assessment (LVIA) and Cumulative Landscape and Visual Impact Assessment (CLVIA) set out in Chapter 6: Landscape and Visual Amenity, Volume 1 of the Environmental Impact Assessment Report (EIA Report). Figures referred to in this appendix are located in Volume 2b: LVIA Figures, Volume 2c: NatureScot LVIA Visualisations and Volume 2d: THC LVIA Visualisations.

The methodology for the production of visualisations was based on current good practice guidance¹ from NatureScot (formerly known as Scottish Natural Heritage (SNH)²) and the Landscape Institute^{3,4,5} and additional requirements set out by the Highland Council⁶. Further information about the approach is provided below.

Paper Maps Used

- Ordnance Survey (OS) Maps:
 - Landranger 1:50,000 Scale (Sheets 26, 34, 35);
 - Explorer 1:25,000 Scale (Sheets 400, 415, 416, 417, 431, OL55, OL56);
- Online map search engines:
 - Bing, mapping website. (Online Available at: www.bing.com/maps); and
 - Google, mapping website. (Online Available at: www.maps.google.com).

Data Used for Digital Terrain Modelling (DTM)

- OS Terrain® 5 mid-resolution height data (DTM) (5m grid spacing, 2.5 metres RMSE);
- Ordnance Survey 1:25,000 raster data (to provide detailed maps for viewpoint locations)
- Ordnance Survey 1:50,000 raster data (to show surface details such as roads, forest and settlement detail equivalent to the 1:50,000 scale Landranger maps);
 and
- Ordnance Survey 1:250,000 raster data (to provide a more general location map).

A6.2.1 ZONE OF THEORETICAL VISIBILITY (ZTV) MAPPING

Evaluation of the theoretical extent to which the wind farm would be visible across the Study Area was undertaken by establishing a ZTV using specific computer software designed to calculate the theoretical visibility of the Development within its surroundings. ESRI's ArcMap 10.5.1 software was used to generate the ZTV. The Spatial

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¹ SNH (2017), Visual Representation of Wind Farms, Version 2.2. [Online] Available at: https://www.nature.scot/visual-representation-wind-farms-guidance (Accessed 06/10/2020)

² Scottish Natural Heritage (SNH) rebranded in August 2020 as NatureScot. Where relevant reference is still made to SNH within this chapter in respect of guidance which remains valid and is yet to be republished etc.

³ Landscape Institute (2019). Advice Note 01/11 Photography and photomontage in landscape and visual impact assessment. [Online] Available at: https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/migrated-legacy/LIPhotographyAdviceNote01-11.pdf (Accessed 06/10/2020)

⁴ Landscape Institute and the Institute of Environmental Management and Assessment (2013). Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3).

⁵ Landscape Institute (2019). Technical Guidance Note 06/19 Visual Representation of Development Proposals. [Online] Available at: https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI TGN-06-19 Visual Representation.pdf (Accessed 06/10/2020)

⁶ The Highland Council (2016). Visualisation Standards for Wind Energy Developments. [Online] Available at: http://www.highland.gov.uk/download/downloads/id/12880/visualisation_standards_for_wind_energy_developments.pdf (Accessed 06/10/2020)

Analyst/Viewshed tool does not use mathematically approximate methods. This program calculates areas from which the turbines are potentially visible. This is performed on a 'bare ground' computer generated terrain model, which does not take account of potential screening by buildings or vegetation. It should be noted that the software uses raster height data, but while it is displayed as continuous data (with each grid square referred to as a 'cell'), it assumes a single height value from the centre of that cell for the whole cell. Therefore, any height variations between centre points of cells will not be recognised.

The DTM used for the LVIA analysis is OS Terrain® 5 height data, obtained from Ordnance Survey in 2020. The root-mean-square error (RMSE) of this data is 2.5 m. The DTM data is represented by 5x5m grids, which means that the software calculates the number of turbines visible from the centre point of each 5x5m grid/square area. This data was used to calculate visibility within the 40 km buffer area of the Site. Visibility out with the 40 km buffer was based on the OS Terrain[™] 50 height data (25 m contour).

The DTM data has been not been altered (i.e. by the addition of local surface screening features) for the production of the ZTV. We have not identified any significant discrepancies between the used DTM and the actual topography around the Study Area. The effect of earth curvature and light refraction has been included in the ZTV analysis and a viewer height of 2 m above ground level has been used. As it uses a 'bare ground' model, it is considered to over emphasise the extent of visibility of the Development and therefore represents a 'maximum potential visibility' scenario.

The ZTV was calculated to show the number of turbines visible to blade tip height (149.9 m) and hub height (83.4 m). The ZTV calculated to blade tip height is shown on Figure 6.3a and Figure 6.3b, the hub height ZTV is shown in Figure 6.4a and Figure 6.4b. An additional ZTV, illustrating the comparative visibility of turbine blade tips only against turbine hubs and blade tips, is shown on Figure 6.5. Subsequent figures which include the ZTV make use of the ZTV to blade tip height.

To construct cumulative ZTVs (CZTVs) to illustrate the cumulative visibility of the Development in conjunction with other wind farms, the ZTV to tip height of each wind farm was generated (based on the tip height of each turbine to an applicable maximum radius in accordance with the current NatureScot guidance (SNH, 2017), and then combined with the Development ZTV (40 km radius). The cumulative CZTVs were set up to show the number of wind farms (rather than the number of turbines) visible (Figure 6.9 to Figure 6.16). The CZTVs are colour coded to distinguish between areas where the Development is predicted to be visible (either on its own, or in conjunction with other wind farms), and areas where other wind farms would be visible, but the Development would not.

A6.2.2 VIEWPOINT PHOTOGRAPHY

The methodology for photography is in accordance with guidance from NatureScot⁷, the Landscape Institute⁸ and the Council⁹. The focal lengths used are in accordance with recommendations contained in guidance and are stated on the figures. Photography was undertaken by LUC between July 2019 and August 2020. A Nikon D750 and a D700 full frame sensor digital single lens reflex (SLR) camera, with a fixed 50mm focal length lens, was used to undertake photography from all viewpoint locations.

Arcus Consultancy Services Ltd

⁷ Scottish Natural Heritage (2017). Visual Representation of Wind Farms, Version 2.2. [Online] Available at: https://www.nature.scot/visual-representation-wind-farms-guidance (Accessed 06/10/2020)

⁸ Landscape Institute (2019). Advice Note 01/11 Photography and photomontage in landscape and visual impact assessment. [Online] Available at: https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstituteorg/migrated-legacy/LIPhotographyAdviceNote01-11.pdf (Accessed 06/10/2020)

⁹ The Highland Council (2016). Visualisation Standards for Wind Energy Developments. [Online] Available at: http://www.highland.gov.uk/download/downloads/id/12880/visualisation_standards_for_wind_energy_developme nts.pdf (Accessed 06/10/2020)

A tripod with vertical and horizontal spirit levels was used to provide stability and to ensure a level set of adjoining images. The camera was orientated to take photographs in landscape format. A panoramic head was used to ensure the camera rotated about the no-parallax point of the lens in order to eliminate parallax errors¹⁰ between the successive images and enable accurate stitching of the images. The camera was moved through increments of 24° (degrees) and rotated through a full 360° at each viewpoint. Fifteen photographs were taken for each 360° view.

The location of each viewpoint and information about the conditions was recorded in the field in accordance with NatureScot (SNH, 2017) and LI guidance (LI, 2019).

Weather conditions and visibility were considered an important aspect of the field visits for the photography. Where possible, visits were planned around clear days with good visibility. Viewpoint locations were visited at times of day to ensure, as far as possible, that the sun lit the scene from behind, or to one side of the photographer. South facing viewpoints can present problems particularly in winter when the sun is low in the sky. Photography opportunities facing into the sun were avoided where possible to prevent the wind turbines appearing as silhouettes. Adjustments to lighting of the turbines were made in the rendering software to make the turbines appear realistic in the view under the particular lighting and atmospheric conditions present at that time the photography was taken.

A6.2.3 VISUALISATIONS

A6.2.3.1 Photographic Stitching, Wirelines and Photomontages

Photographic stitching software PTGui© 11.19 has been used to stitch together the adjoining frames to create panoramic baseline photography. A selection of identical control points have been created within each of the adjoining frames to increase the level of accuracy when stitching the 360° panoramic photography.

The software package ReSoft© WindFarm version 4.2.5.3 was used to create a digital terrain model (DTM) from OS Terrain® 5 height data. The DTM includes the Site, viewpoint locations and all landform visible within the baseline photography. Turbine and viewpoint location coordinates were entered. Photomontages have been constructed to show the candidate turbine with the specified tip height, hub height and rotor diameter. A default viewer height of 1.5 m above ground level has been set in the ReSoft© software, however on limited occasions this viewer height has been increased by a small increment to achieve a closer match between the terrain data and photographic landform content¹¹.

Wind farm layouts included within the cumulative assessment have been added to the ReSoft© WindFarm model.

The Panoramic baseline daytime photographic images were imported into ReSoft© WindFarm software. From each viewpoint the wireline views of the landform model with the proposed turbines were carefully adjusted to obtain a match. Fixed features on the ground, such as buildings and roads, were located in the model and used as markers to help with the alignment process where necessary. Each view was rendered taking account of the sunlight and the position of the sun in the sky at the time the photograph was taken. Blade angle and orientation adjustments were also made to represent a realistic situation.

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¹⁰ Parallax is the difference in the position of objects when viewed along two different lines of sight. In the case of a camera this would occur if the rotation point of the lens was not constant and would result in stitching errors in the panorama.

¹¹ An altered height above ground level was used for mountain summits where local topography did not match the wireframes due to data resolution.

The exported renders were imported into Adobe Photoshop@ where they were aligned and composited with the baseline photography. Turbines or sections of turbines which were located behind foreground elements in the photograph were masked out (removed) to create the photomontage.

Finally, where applicable the images were converted from Cylindrical Projection to Planar Projection using PTGui© 11.19 software.

A6.2.3.2 Single Frame I mages

Single frame landscape photographs orientated towards the centre of the turbine layout were taken at the same time as photography for the panoramas.

Single frame Photomontages were set up in ReSoft© WindFarm following the same process as the panoramic images.

These photomontages were set up using the 50mm lens photography and additional images were provided to 75mm lens equivalent, cropped from the 50mm image using PTGui© 11.19 software.

Information regarding the correct viewing distance (binocular) and caveats are located on the figure.

A6.2.3.3 Figure Layout

The printed figures for the viewpoints produced in accordance with THC and NatureScot requirements are collated in two separate A3 volumes (Volume 2c: NatureScot Visualisations and Volume 2d: THC Visualisations) to allow them to be used independently.

THC Compliant Visualisations

Adobe InDesign software was used to present the figures. The dimensions for each image (printed height and field of view) are in accordance with THC requirements. Photography information and viewing instructions are provided on each page where relevant.

The A3 format pages for each viewpoint, as agreed with the Council¹², are set out as follows:

- The first page contains an enlarged OS 1:25,000 scale map showing, in detail, the viewpoint location and direction of view, and a written description of the viewpoint
- The following two pages contain 65.5° panoramic images for landscape assessment. The panoramic photomontage is followed by the panoramic wireline and baseline photograph. These images are all shown in planar projection;
- For nine of the 19 LVIA assessment viewpoints 65.5° cumulative wirelines were produced to show multiple wind farms considered in the CLVIA. A 65.5° cumulative wireline (planar projection) image follows on from the figures listed above. The colours assigned to cumulative wind farms follow THC requirements regarding their status:
- The subsequent three pages contain the single frame images for visual impact assessment. The 50mm focal length photomontage precedes the 75mm focal length photomontage and 75mm focal length monochrome images;
- For four of the 19 LVIA assessment viewpoints it was agreed with THC that wireline only visualisations would be prepared. For these viewpoints (Viewpoint 16 – 19) a 65.5° cumulative wireline, a 39.6° wireline (equivalent of a single frame 50mm image) and a 27° wireline (equivalent of a single frame 75mm image) are provided.

¹² The necessary visualisation images for each viewpoint were agreed with the Council via email correspondence in August 2020

Images for viewing in the Councils online panoramic viewer are provided directly to the Council in digital format and include colour and monochrome panoramic (up to 360°) photomontages for VP 7: General Wade's Military Road, VP11: Meall Fuar-mhonaidh and VP15: Carn na Leitire.

NatureScot Compliant Visualisations

Adobe InDesign© software was used to present the figures. The dimensions for each image (printed height and field of view) are in accordance with NatureScot requirements. Photography information and viewing instructions are provided on each page where relevant.

The elongated A3/A1 width format pages presented for each viewpoint are set out as follows:

- The first A3 page contains an OS 1:50,000 scale map showing the viewpoint location, direction of the 90° baseline photography, wireline views and 53.5° photomontage view. Wind turbine locations for the Development and other existing or proposed wind farms are also shown;
- The following page contains 90° baseline photography and wireline to illustrate the wider landscape and visual context. These are shown in cylindrical projection and presented on an A1 width page. Additional pages in the same format are provided where relevant to illustrate wider cumulative visibility up to 360°;
- The subsequent two pages contain a 53.5° wireline and photomontage. These images are both shown in planar projection and presented on an A1 width page.
- For four of the 19 LVIA assessment viewpoints wireline only views are presented. For these viewpoints (Viewpoint 16 19) 90°cumulative wirelines to illustrate wider cumulative visibility up to 360° and single 53.5° wirelines are presented.



CORRIEGARTH 2 WIND FARM

APPENDIX A6.3

ASSESSMENT OF EFFECTS ON SPECIAL LANDSCAPE QUALITIES

2020





A6.3 ASSESSMENT OF EFFECTS ON SPECIAL LANDSCAPE QUALITIES

A6.3.1 INTRODUCTION

This AESLQs is independent of, but draws upon, the Landscape and Visual Impact Assessment (LVIA) contained in Chapter 6: Landscape and Visual Amenity of the EIA Report, providing specific additional detail in respect of potential effects on the key special qualities of the Cairngorms National Park (CNP) which are set out in 'The special landscape qualities of the Cairngorms National Park' (Scottish Natural Heritage (SNH) and Cairngorms National Park Authority (CNPA), 2010).

Figures and visualisations referred to within this assessment can be found in EIA Report Volume 2b: LVIA Figures and EIA Report Volume 2c: NatureScot LVIA Visualisations.

A6.3.2 CONTEXT TO NATIONALLY DESIGNATED LANDSCAPES IN SCOTLAND

Scotland has two national landscape designations, National Parks and National Scenic Areas. National Parks are designated under the National Parks (Scotland) Act 2000 because they are areas of national importance for their natural and cultural heritage. These areas are highly valued and represent the country's finest landscapes, which are afforded the highest level of protection in National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP).

With respect to onshore wind energy development, SPP (Table 1, Page 39) categorises National Parks (NPs) and National Scenic Areas (NSAs) as "*Group 1: Areas where wind farms will not be acceptable"*. For development located outside nationally designated landscapes, SPP states that these should only be permitted where:

- "the objectives of designation and the overall integrity of the area will not be compromised; or
- any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance." (para 212. SPP, 2014)

Due to the presence of the CNP within the Study Area for the LVIA, the scale and location of the Development and the predicted visibility indicated from the western extents of the CNP (as illustrated on Figure 6.7b), the CNPA landscape advisor³ considered it necessary to determine whether potential significant effects on the special landscape qualities of the National Park would occur. Therefore, an Assessment of Effects on Special Landscape Qualities (AESLQs) of the Cairngorms National Park was requested to supplement the LVIA.

A6.3.3 APPROACH AND METHODOLOGY

A6.3.3.1 Guidance and Reference

The following list identifies all key documents and sources of information used in preparing the assessment:

Corriegarth 2 Wind Farm Ltd

¹ SNH and CNPA (2010). The special landscape qualities of the Cairngorms National Park. Scottish Natural Heritage Commissioned Report, No.375. [Online]:

http://www.snh.org.uk/pdfs/publications/commissioned_reports/375.pdf (Accessed 08/09/2020)

² Scottish Natural Heritage (SNH) rebranded in August 2020 as NatureScot. Where relevant reference is still made to SNH within this chapter in respect of guidance which remains valid and is yet to be republished etc.

³ Request for AESLQs made by CNPA landscape advisor confirmed via email correspondence from NatureScot Case Officer – 5 May 2020

- The Special Landscape Qualities of the Cairngorms National Park⁴;
- The special qualities of the National Scenic Areas⁵; Scottish Landscape Character Types Maps and Descriptions⁶; Cairngorms National Park Landscape Areas⁷;
- SNH (unpublished, 2018). Guidance for Assessing the Effects on Special Landscape Oualities (Working Draft 11)8;
- Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)9;
- Assessing the cumulative impact of onshore wind energy developments¹⁰;Spatial Planning for Onshore Wind Turbines – natural heritage considerations, Guidance¹¹; Visual Representation of Wind Farms, Version 2.2¹²;
- Siting and Designing Wind Farms in the Landscape, Version 313; Policy Statement No 02/02: Strategic Locational Guidance for Onshore Windfarms in Respect of the National Heritage¹⁴; and Spatial Planning for Onshore Wind Turbines – natural heritage considerations, Guidance¹⁵.

A6.3.3.2 **Data Sources**

- Ordnance Survey (OS) maps;
- OS 'Terrain50' and 'Terrain5' Digital Terrain Model; and
- SNHi Natural Spaces (GIS data).

A6.3.3.3 Methodology

The assessment has been carried out in accordance with NatureScot's working draft methodology 'Guidance for Assessing the Effects on Special Landscape Qualities' (SNH, Working Draft 11, November 2018). The draft guidance advocates a four step process and each step is described below:

⁴ SNH (2010), The Special Landscape Qualities of the Cairngorms National Park. [Online] Available at: https://www.nature.scot/naturescot-commissioned-report-375-special-landscape-qualities-cairngorms-nationalpark (Accessed 06/10/2020)

⁵ SNH (2010), The special qualities of the National Scenic Areas, SNH Commissioned Report No.374. [Online] Available at: https://www.nature.scot/naturescot-commissioned-report-374-special-qualities-national-scenic-areas (Accessed 06/10/2020)

⁶ SNH (2019), Scottish Landscape Character Types Maps and Descriptions. [Online] Available at: https://www.nature.scot/professional-advice/landscape/landscape-character-assessment/scottish-landscapecharacter-types-map-and-descriptions (Accessed 06/10/2020)

⁷ Cairngorms National Park. Landscape Areas. [Online] Available at: https://cairngorms.co.uk/caringfuture/cairngorms-landscapes/landscape-areas/ (Accessed 06/10/2020)

⁸ Draft quidance document and Annex 1 pro forma provided by NatureScot Case Officer via email – 21 May 2020 ⁹ Landscape Institute and the Institute of Environmental Assessment (2013), Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)

¹⁰ Scottish Natural Heritage (SNH) (2012), Assessing the cumulative impact of onshore wind energy developments. [Online] Available at: https://www.nature.scot/guidance-assessing-cumulative-impact-onshorewind-energy-developments (Accessed 06/10/2020)

¹¹ SNH (2015), Spatial Planning for Onshore Wind Turbines – natural heritage considerations, Guidance. [Online] Available at: https://www.nature.scot/sites/default/files/2019-10/Guidance%20-%20Spatial%20Planning%20for%20Onshore%20Wind%20Turbines%20-

^{%20}natural%20heritage%20considerations%20-%20June%202015.pdf (Accessed 06/10/2020)

¹² SNH (2017), Visual Representation of Wind Farms, Version 2.2. [Online] Available at: https://www.nature.scot/visual-representation-wind-farms-guidance (Accessed 06/10/2020)

¹³ SNH (2017), Siting and Designing Wind Farms in the Landscape, Version 3. [Online] Available at: https://www.nature.scot/siting-and-designing-wind-farms-landscape-version-3a (Accessed 06/10/2020)

¹⁴ SNH (2009), Policy Statement No 02/02: Strategic Locational Guidance for Onshore Windfarms in Respect of the National Heritage.

¹⁵ SNH (2015), Spatial Planning for Onshore Wind Turbines – natural heritage considerations, Guidance. [Online] Available at: https://www.nature.scot/sites/default/files/2019-10/Guidance%20-

^{%20}Spatial%20Planning%20for%20Onshore%20Wind%20Turbines%20-

^{%20}natural%20heritage%20considerations%20-%20June%202015.pdf (Accessed 06/10/2020)

Step 1 - The Proposal: Gain as full an understanding of the proposal as possible

The assessment should draw upon the project description to identify and describe the main components of the proposal and provide a summary of those which could impact on the special landscape qualities (SLQs) of the designated landscape being considered. This should also consider where there is potential for specific individual components or the proposal/development in its entirety to have an impact on the scale, shape, diversity and variety of the SLQs. Gaining a thorough understanding of the proposal allows the full extent of effects on the SLQs to be understood.

Step 2 – Define the Study Area and Scope of the Assessment identifying the area likely to be affected

This step of the process includes two important aspects. Firstly, the extent of the Study Area is identified based on the location and form of the proposal/development. Secondly, the relationship between this Study Area to the wider extents of the NP or NSA. The guidance advocates consideration of the following when defining the Study Area and scope of the assessment:

- "The extent of visibility of the proposal including any ZTVs for the proposal;
- An understanding of how the proposal will be experienced from parts of the NSA/NP, including routes, movement through and key locations in the designated area:
- Site based work (in initial study area might be identified and subsequently refined following a site visit);
- Landscape character;
- The potential for cumulative effects."

The Study Area for the SLQ assessment may not be the same as the Study Area for the associated LVIA and should relate to how the SLQs are presented and likely to be affected by the proposal/development.

Step 3 - The Analysis of Impacts and Effects on SLQs

This step of the assessment includes four key stages, and the draft guidance advocates a tabulated approach, with consideration of the key factors set out below for each stage:

Table A6.3.1 Example Assessment Presentation

| The Assessment | | | | |
|--|---|---|--|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | |
| - Focus the assessment to be appropriate and proportionate to the landscape context and type of development proposed; - Analysis of ZTVs, supported by fieldwork and knowledge of area; - Consultation with National Park Authority, | - Combining of landscape character and qualities for basis of assessment, informed by SLQ description and LCA; - Supported by onsite experience, fieldwork, and assessment, and | - Assessment focused on the key landscape characteristics that underpin the SLQ and their experience; - Use of ZTV, visualisations, wirelines and photomontages will inform the | - Is there potential for mitigation to reduce effects on the SLQ(s) and their experience (e.g. through design modifications or management)? - Realistic timescales for mitigation to become effective; | |

| The Assessment | | | | |
|---|---|---|--|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | |
| Local Authority or NatureScot as appropriate; - SLQs should be evident and experienced within the Study Area; - Consider the type of SLQs and how they are experienced, potentially grouping those which interact or contribute collectively to experience of the area. | knowledge of how the Study Area is used; - Discussion with National Park Authority, Local Authority or NatureScot as appropriate; | assessment, alongside site visits; - Consideration of the impacts of the key components of the proposal using design principles (such as shape, scale, diversity, texture) to explain the impacts and how they may be further mitigated. | - The results of mitigation in reducing effects; - What is the certainty that mitigation will become effective? -Is there potential for enhancement/ compensation? | |

Judgement on the level of effect on SLQs, considering:

- a) Sensitivity of the resource (considered high because of the national status of the designation)
- b) Nature of the effects (magnitude of change) and its longevity;
- c) Potential to avoid or mitigate the effect (through location, siting, design); and
- d) Limitations to carrying out mitigation (e.g. conflicting objectives, technological challenges).

Step 4 – Summary of Impacts on the SLQs, implications for the NSA/NP and possible future effects on SLQs and recommendations for mitigation

The final stage of the assessment draws together the assessment to present a clear and transparent summary and evidence, to inform decisions in relation to relevant planning policy. The guidance advocates that the summary should include:

- "The relationship between affected SLQs (where relevant) in the context of the study area and the wider designated landscape, including any specific locational issues in relation to the way the landscape is experienced e.g. gateway experiences or specific features or views;
- The nature and levels of effects on the relevant SLQs.
- Relationship of people with SLQs and how they may be experienced and affected (expectations of people, mode of transport);
- A consideration of possible cumulative effects and the incremental erosion of a designated landscape's SLQs over time."

A concluding statement of effect should be included, with respect to implications for the Study Area of the assessment, the SLQs affected, and the overall integrity of the wider designated area. As advocated by the draft guidance (SNH, 2018) the assessment which follows below is set out in accordance with the above key steps, presenting a transparent assessment with clear reasoning for the effects identified.

A6.3.4 STEP 1 - THE PROPOSAL

A6.3.4.1 The Development

The Development is described in detail in Chapter 4: Development Description and comprises 16 wind turbines and ancillary development (including proposed substation,

access tracks, and borrow pit). The Development is located entirely outside the Cairngorms National Park (CNP), located approximately 9.7 km to the east, south-east from the outermost wind turbines.

The approach to the siting and design of the Development is set out in Chapter 3: Site Selection and Design, including details of how mitigation of potential landscape and visual effects, including those related to the CNP, has been embedded in the design process through site selection, design of the wind turbine layout and selection of the candidate wind turbine (size/scale).

Given the intervening distance, effects are considered to arise exclusively from the introduction of the proposed wind turbines, whereas tracks and other ancillary development are unlikely to form discernible features in views from the CNP. No visible aviation safety lighting of the proposed wind turbines is required¹⁶ and therefore no effects on qualities associated with dark skies will occur.

A6.3.5 STEP 2 - THE STUDY AREA AND SCOPE OF THE ASSESSMENT

A6.3.5.1 The Study Area

The CNP covers a vast area of 4528 square kilometres, extending north-east, east and south-east from the Development. The ZTV in Figure 6.7b indicates visibility from elevated summits on the western park boundary, and from elevated summits and west-facing slopes within the north-western extents of the park, including the summits of Cairn Gorm and Braeriach.

The assessment of effects therefore focuses on two discrete areas within the wider extents of the CNP:

- Area A: located along the western CNP boundary formed by the eastern Monadhliath Ridge (*Rolling Uplands Cairngorms LCT¹⁷*), including the summits of Carn Sgulain, A'Chailleach and Càrn an Fhreiceadain and Càrn Ban. A proportion of the area also forms part of WLA20: Monadhliath, effects upon which are considered in the Wild Land Impact Assessment presented in Appendix A6.4;
- Area B: located further into the interior of the CNP at the western fringes of the Cairngorm Mountains Massif and including the Munro Hill summits of Cairn Gorm and Braeriach (*Mountain Massif Cairngorms LCT*¹⁸).

The extents of Area A and the theoretical visibility of the Development (tip height ZTV) are shown on Plate 1 below.

¹⁶ Letter received from Ministry of Defence Safeguarding Department – 14 August 2020

¹⁷ SNH (2019), Landscape Character Type 125 Rolling Uplands – Cairngorms [Online]: https://www.nature.scot/sites/default/files/LCA/LCT%20125%20-%20Rolling%20Uplands%20-%20Cairngorms%20-%20Final%20pdf.pdf (Accessed 05/09/2020)

¹⁸ SNH (2019), Landscape Character Type 122 Mountain Massif - Cairngorms [Online]: https://www.nature.scot/sites/default/files/LCA/LCT%20122%20-%20Mountain%20Massif%20-%20Cairngorms%20-%20Final%20pdf.pdf (Accessed 05/09/2020)

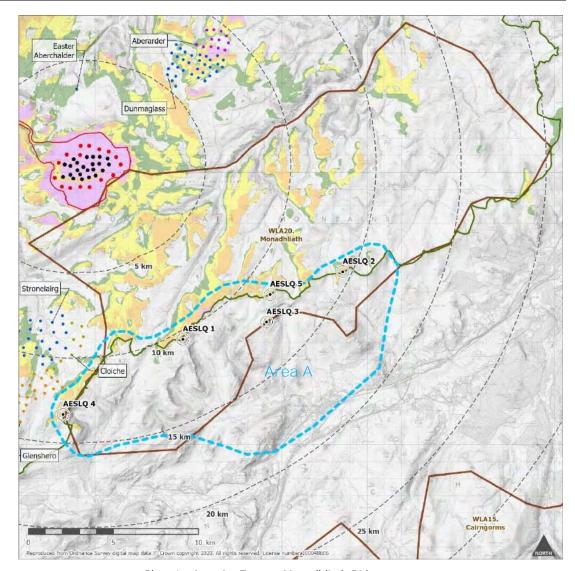


Plate 1: Area A - Eastern Monadhliath Ridge

Area B

The extents of Area B and the theoretical visibility of the Development (tip height ZTV) are shown on Plate 2 below.

Plate 2: Area B - Western fringes of the Cairngorm Mountains Massif

A6.3.5.2 Scope of Assessment

In preparing this assessment Chartered Landscape Architects from LUC have engaged with the CNPA landscape advisor via the NatureScot case officer in accordance with their Agreement on roles in advisory casework between NatureScot and Scottish National Park Authorities (2013)¹⁹ to agree the approach, scope and presentation of the assessment (detailed in Table 6.1 contained in Chapter 6 of the EIA-R).

The CNPA landscape advisor suggested²⁰ that the following aspects of the Development have the potential to influence the effects on some of the CNP SLQs:

'The proposed wind turbines being located upon higher ground, appearing to breach the shelf/basin that the existing wind farm is located within and to seem more imposing upon the qualities of the Park to the east;

¹⁹ SNH (2013) Agreement on roles in advisory casework between Scottish Natural Heritage and Scottish National Park Authorities. [Online]: https://www.nature.scot/sites/default/files/2018-06/Agreement%20on%20roles%20in%20advisory%20casework%20between%20Scottish%20Natural%20Heritag e%20and%20Scottish%20National%20Park%20Authorities.pdf (Accessed 10/09/2020) ²⁰ Via email correspondence with NatureScot Case Officer - 5 May 2020

- The proposed wind turbines interrupting distinct views from the Park over the 'layers' of landform horizons;
- The proposal creating a collectively complex image due to wind turbines of different size and spacing, contrasting to the distinct simplicity of the hill landform and land cover; and
- The extent of the proposal diminishing the qualities of open space and perceived separation between the existing Corriegarth, Dunmaglass/Aberarder and Stronelairg/Dell wind farm groups.'

The relevant published SLQ report is 'The Special Landscape Qualities of the Cairngorms National Park' (SNH and CNPA, 2010)¹. The relevant landscape character assessments for areas from which indirect effects may occur include The Monadhliath: South Monadhliath Landscape Character Area^{Error! Bookmark not defined.} and Cairngorms Central Massif Landscape Character Area^{Error! Bookmark not defined.}

The CNPA landscape advisor highlighted the following CNP SLQs for consideration in the assessment:

- 'General qualities vastness of space, scale and height' and 'a landscape of layers, from inhabited strath to remote, uninhabited upland';
- 'The mountains and plateaux the surrounding hills';
- 'Wildlife and nature wildness';
- Visual and sensory qualities layers of receding ridge lines'; and
- 'Recreation spirituality'

A review of each of the SLQs of the CNP was undertaken with specific regard to the potential for them to be affected by the type and scale of development proposed.

To support the assessment, a number of assessment points were identified within the areas of the CNP predicted to experience potential effects from the introduction of the Development (Area A and Area B). The ZTV and consultation with Cairngorms National Park Authority (CNPA)²¹ informed the selection of six assessment points located within the CNP which are shown on Figure 6.17 to Figure 6.20 and described in Table A6.3.2 below. These assessment points have informed the consideration of potential effects on the SLQs and are referenced in respect to the relevant SLQs considered in the assessment.

Potential views of the Development are illustrated by accompany photomontage or wireline visualisations (visualisation type for each assessment point indicated in Table A6.3.2) which are presented in EIA Report Volume 2c: NatureScot LVIA Visualisations.

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²¹ Via email correspondence with NatureScot Case Officer - 12 May 2020

Table A6.3.2 SLQs Assessment Points

| ADIE AU. J. Z JLUS A | | C, 11 1 OII 1 | | |
|--|--------------------|---------------|----------|---|
| Location ²² | OS Grid Referer | | Distance | Reason for selection |
| AESLQ1: Càrn Ban (WLA3) (Figure 6.42, photomontage visualisation) | 263179 | 803183 | 10.5 km | Representative of views experienced by recreational receptors (hill walkers), including sequential effects experienced by receptors accessing the Monadhliath Mountains via the circuit between the Munro summits of Carn Dearg, Carn Sgulain and A'Chailleach. |
| AESLQ2: Càrn an Fhreiceadain (WLA7) (Figure 6.43, wireline visualisation) | 272571 | 807152 | 14.5 km | Representative of views experienced by recreational receptors (hill walkers and mountain bikers) from the relatively accessible Corbett summit. |
| AESLQ3: A'Chailleach (WLA5) (Figure 6.44, wireline visualisation) | 268097 | 804195 | 12.5 km | Representative of views experienced by recreational receptors (hill walkers) from the Munro summit, and also located within WLA 20. |
| AESLQ4: Geal Charn (LVIA VP13 and WLA6) (Figure 6.33, photomontage visualisation) | 256139 | 798771 | 13.3 km | Represents views experienced by recreational receptors from the Munro summit, and also located within WLA 20. |
| AESLQ5: Carn Sgulain (LVIA VP9 and WLA4) (Figure 6.29, photomontage visualisation) | 268305 | 805814 | 11.6 km | Represents views experienced by recreational receptors at the Munro summit, and also located within WLA 20. |
| AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) (Figure 6.39, wireline visualisation) | 300459 | 804888 | 41.8 km | Represents views experienced by recreational receptors (hill walkers, climbers, skiers and mountain bikers) from the popular and accessible mountain location within the CNP. |

A6.3.5.3 How the area is used and experienced by people?

The CNP is visited for a variety of recreational activities, including hill walking, climbing, mountain biking, sport shooting (deer stalking and grouse shooting) and winter sports. Visibility of the Development from the Study Area (defined by Area A and Area B) will be almost exclusively limited to those experienced by receptors recreating (e.g. accessing the eastern Monadhliath Ridge and Munro and other hill summits via well used and promoted routes) or working (e.g. carrying out activities related to upland hill farming or sporting estate management) in these uninhabited upland landscapes of the CNP.

Area A along the eastern ridge of the Monadhliath Mountains defines the western CNP boundary and is defined by a number of hill summits which present a formidable draw and physical challenge to hill walkers visiting the area. Tracks within Glen Banchor and Glen Markie, with footpaths and smaller tracks branching off from the glens, provide

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 $^{^{22}}$ A number of the AESLQs assessment points are also referenced as VPs in the LVIA and/or assessment points within the Wild Land Impact Assessment in Appendix 6.4

access to these summits and the ridges between. Occasional estate tracks provide access deeper into the interior of the plateau beyond, via incised valleys which cut into the fringes of the Monadhliath. Figure 6.17 illustrates the location of a number of the promoted core paths (e.g. UBS8 - Glen Banchor, UBS34 - Kingussie to Newtonmore via Loch Gynack and etc.) which connect into less formalised paths which provide access to the upland landscapes at the western edge of the CNP, whilst a number of heritage paths following estate tracks provide access from the lowland settled strath into the interior of the Monadhliath Mountains. The Munro summits of Carn Dearg, Carn Sgulain and A'Chailleach are often accessed by hillwalkers as part of a circuit (either clockwise or anticlockwise) via Glen Banchor within the CNP and passing the (former Munro) hill summit of Càrn Ban.

Area B within the interior of the CNP is accessed by a variety of recreational users throughout the year, with hill walkers, climbers and mountain bikers typically accessing the montane plateau and summits between spring and autumn, and winter climbers and winter snow sport users accessing the area throughout the winter season. Walker access into the upland landscapes within Area B is promoted via the GR12 - Allt Mor Trail core path running from Loch Morlich to the Cairngorm Mountain upper car park, from where a number of well used but less formalised hill paths provide access to the upland plateau via the northern corries and ridges. As a consequence of the wide range of outdoor activities which are catered for within this area, manmade influence is evident across the north-facing slopes of Cairn Gorm including infrastructure associated with the Cairngorm Ski Centre and the funicular mountain railway which transports tourists to and from the Ptarmigan Restaurant found at the summit station throughout the year²³. The nearby Munro summit of Braeriach (1,296 m AOD) is the third-highest mountain in the UK and, along with other nearby hill summits within the Cairngorm Mountains Massif, presents a formidable draw and physical challenge to hill walkers visiting the area.

A6.3.6 STEP 3 - THE ANALYSIS OF IMPACTS AND EFFECTS ON SLQS

Special Landscape Qualities of the CNP are listed in full in the SNH Commissioned Report²⁴. Special Landscape Qualities which may be potentially affected by the Development, including those suggested by the CNPA landscape advisor are listed in Table A6.3.3 below.

Table A6.3.3 sets out the analysis of effects on each SLQ considered in the assessment. The assessment is presented in a tabular format as advocated by the draft guidance, to provide transparency in the judgements which have been taken at each stage of the assessment. The sensitivity of the overall CNP resource is considered to be high, taking account of its high value given the national status of the CNP designation. Whilst the susceptibility of each SLQ is considered in the assessment below, the assessment has focused on those SLOs which are considered to have potential to be affected by the Development and are generally considered to be of medium or high susceptibility to change from the type and scale of the Development proposed.

In accordance with the LVIA assessment methodology set out in Appendix A6.1, judgements of size/scale and geographical extent inform the overall magnitude of change, whilst effects are considered to be long-term (in respect of duration) and reversible (in respect of reversibility), unless otherwise stated. Effects of Moderate or Major are considered to be significant in the context of the EIA Regulations.

²³ It is noted that the Cairngorm Mountain funicular railway has been out of operation since September 2018 which has vastly reduced the number of visitors to the Ptarmigan Restaurant.

²⁴ SNH and CNPA (2010). The special landscape qualities of the Cairngorms National Park. Scottish Natural Heritage Commissioned Report, No.375. [Online] Available at: https://www.nature.scot/naturescotcommissioned-report-375-special-landscape-qualities-cairngorms-national-park (Accessed 06/10/2020)

The key mitigation of potential landscape and visual effects has been embedded in the design process through site selection, design of the wind turbine layout and selection of the candidate wind turbine (size/scale) as set out in Chapter 3: Site Selection and Design. As such no further mitigation is proposed to reduce the identified effects on these SLQs.

Table A6.3.3 Assessment of SLQs of Cairngorms National Park

| Assessment of SLQ | s of Cairngorms National Park | | |
|--|---|---|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact |
| General Qualities | | | |
| Vastness of space, scale and height | "Humans feel small in such a vast landscape of wide panoramas The corries and glens are large and dramatic, and the wide, high plateaux are more expansive than any others in Britain. Open, rolling heather moorland covers great tracts of land, woodlands are extensive and the straths are on a grand scale, hosting majestic rivers." The underlying landscape character of Area A is defined by the Rolling Uplands — Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills". The underlying landscape character of Area B is defined by the Mountain Massif — Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "A massive scale landscape; Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms; and Open, exposed, boulder-strewn summits rising above deep scooped corries, some with elevated lochans". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | The landform of the Study Area is characterised by rounded hills, which form the western edge to the CNP, and elevated side glens within the Monadhliath (Area A). The sense of <i>vastness and space</i> which can be experienced from the western boundary of the CNP from the elevated summits and ridges which form the eastern ridge of the Monadhliath plateau has been diminished by the presence of existing wind farm developments (including the Operational Corriegarth Wind Farm) seen across the plateau to the northwest, west and south-west from Area A. The plateau, which forms a large part of WLA20, is otherwise devoid of built elements and distance is often difficult to discern across the <i>open, rolling heather moorland.</i> The addition of the Development will consolidate and slightly extend the influence of wind farm development on views experienced from the western edge of the CNP where the true vastness and scale of the Monadhliath Mountains can be appreciated. However, the Development will remain a relatively small and distant feature when experienced in this context, as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29) within Area A. Further into the interior of the CNP, the western fringes of the Cairngorm Mountains Massif (Area B), where the landform is larger in scale, allow for more sweeping panoramas from where the vastness of space can be appreciated. The Development will be experienced in long-distance views west | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). |

| Assessment of SLQ | Assessment of SLQs of Cairngorms National Park | | | | |
|--|---|---|---|--|--|
| Stage 1 Identification of | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the | Stage 4 Consideration of | | |
| relevant SLQs within the Study Area | | effects on SLQs | proposed mitigation and timescales, level of impact | | |
| | | from this area of the CNP across the Monadhliath Mountains plateau (as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) and shown in Figure 6.39). | | | |
| | | Overall, a small scale of change will be experienced across a small geographical extent of the CNP as a whole, resulting in a low magnitude of change. | | | |
| A landscape of layers, from inhabited strath to remote, uninhabited upland | "The landscape tends to be horizontally stratified, ascending to the summits in a series of layers: from a meandering river, through a strath of settlement and farmland, through rough pasture, wood pasture, wood and forestry, to moorland with its patchwork of muirburn, and eventually to the high, corrie-fringed mountains. Within the landscape there are also layers of time-depth, with traces of past land use stretching from present day back into prehistory." The underlying landscape character of Area A is defined by the Rolling Uplands – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills; Number of relatively isolated glens; Improved pastures and woodland in larger glens; and Sparse, scattered settlement of isolated traditional farmsteads and estate buildings on lower foothills and flat glen floors". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: | Views of the Development from within the CNP will be limited to those experienced by receptors in generally <i>remote, uninhabited upland</i> environments as illustrated by the ZTV shown on Figure 6.17 (Area A) and Figure 6.7b (Area B). Existing wind farm development is evident from these upland landscapes, including the Operational Corriegarth, Stronelairg, Dunmaglass and Farr Wind Farms which appear in views across the uninhabited upland plateau of the Monadhliath Mountains to the west of the CNP. Inhabited straths within the CNP will be unaffected by visibility of the Development, and although receptors such as hill walkers and mountain bikers travel through these landscapes <i>ascending to the summits</i> and ridges of the eastern Monadhliath ridge. Their experience of a landscape of layers <i>through a strath of settlement and farmland, through rough pasture, wood pasture, wood and forestry, to moorland with its patchwork of muirburn, and eventually to the high, corriefringed mountains (as can be experienced when accessing AESLQ 1, 3 and 5 via Glen Banchor) will not be substantially diminished by the views of distant additional wind farm development seen in views across the Monadhliath on reaching the uninhabited uplands (as illustrated by AESLQ1: Carn Ban (Figure 6.42), AESLQ3: A'Chailleach (Figure 6.44) and AESLQ5: Carn Sgulain (Figure 6.29)).</i> | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Negligible (not significant). | | |

| Assessment of SLQ | Assessment of SLQs of Cairngorms National Park | | | | |
|--|--|---|--|--|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | | |
| | "A massive scale landscape; Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms; Trough-like glens, some with ribbon lakes; and Open, exposed, boulder-strewn summits rising above deep scooped corries, some with elevated lochans". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | In more distant views from Area B the additional wind turbines of the Development will be seen in the context of other existing wind farm developments which are clearly located in the upland landscapes beyond the CNP and will not affect the understanding or perception of a landscape of layers which are more evident within the interior of the CNP. Overall, a barely perceptible scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change. | | | |
| Landscapes both cultural and natural | "At the lower altitudes the land has been long-inhabited, with patterns of land use, settlement and transport derived from the primary industries of farming, forestry and field sports. In contrast, the highest ground comprises uninhabited wild land of moor and mountain, with the greatest extent of natural vegetation and landform in the British Isles. Hence within this large area can be found both cultural landscapes, with a rich history of human occupation, and natural, wild landscapes under the dominion of nature." The underlying landscape character of Area A is defined by the Rolling Uplands — Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Number of relatively isolated glens; Improved pastures and woodland in larger glens; Sparse, scattered settlement of isolated traditional farmsteads and estate buildings on lower foothills and flat glen floors; and Perception of relative remoteness". | The Development will be seen in the context of other existing wind farm developments which have an influence on the upland landscapes at the western boundary of the CNP (Area A) and the western fringes of the Cairngorm Mountains (Area B). The large scale and largely uninhabited upland plateau of the Monadhliath Mountains to the west of the CNP display natural and wild characteristics; however, the introduction of wind farm developments has diminished these somewhat and, although seen at considerable distance from the CNP, have led to a sense of change within these otherwise natural undeveloped uplands (as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29) within Area A, and AESLQ6: Ptarmigan Restaurant, Cairngorm (Figure 6.39) from Area B). The proposed wind turbines will be seen in the same landscape context as existing wind farm developments, including the Operational Corriegarth, Stronelairg, Dunmaglass and Farr Wind Farms where the sense of the natural, uninhabited uplands neighbouring the CNP will be slightly diminished. However, the settled lowland landscapes within | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | |

| Assessment of SLC | Assessment of SLQs of Cairngorms National Park | | | | |
|---|--|---|---|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | |
| | The underlying landscape character of Area B is defined by the <i>Mountain Massif – Cairngorms LCT</i> and the following characteristics are judged to contribute to this SLQ: • "Lack of settlement, just one or two steadings and the recreational infrastructure of ski centre, and tracks and footpaths; and • Exposed, remote and wild character". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | the CNP will be unaffected by the Development and remain largely unaffected by wind energy development. Overall a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change for this SLQ. | | | |
| The Mountains and | d Plateaux | | | | |
| The unifying presence of the central mountains | "The high ground of the Cairngorms is a unifying presence for the whole area. It is both the geographical and the visual centre, being the origin of most rivers and glens and forming the backdrop to the lives of those who live and work in the straths and glens." The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms; Distinctive tors on some summits, and occasional rocky cliffs; and Open, exposed, boulder-strewn summits rising above deep scooped corries, some with elevated lochans". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | At a distance of approximately 31 km, the wind turbines of the Development will be barely discernible in long-distance views from the western fringes of the Cairngorm Mountains at the core of the CNP (Area B). Although appearing as small features in these distant views, the eastern most wind turbines will appear alongside those of the Operational Corriegarth Wind Farm and within the context of other existing wind farms (Stronelairg, Dunmaglass, Farr and Kyllachy) in long-distance views west from the CNP across the Monadhliath Mountains plateau (as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) and shown in Figure 6.39). Despite the visibility of the additional wind turbines, the Development will not affect the backdrop of views from within the CNP, and the unifying presence it represents for the CNP more widely. Overall, a barely perceptible scale of change will be experienced across a small geographical extent, resulting in a barely perceptible magnitude of change. | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Negligible (not significant). | | |

| Assessment of SLQ | Assessment of SLQs of Cairngorms National Park | | | | |
|--|---|--|---|--|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | | |
| An imposing massif of strong dramatic character | "The high, rounded peaks and plateaux, the corries, glens and foothills, and the long, gently undulating ridges have a massive, looming and domineering presence. However, it is the mountain massif as a whole that is the key feature, with individual mountains often hard to distinguish or identify. A trained eye can pick out the more distinctive features such as the trough of the Lairig Ghru, the cliffs of Lochnagar, the Northern Corries, or Ben Avon with its tors, but these are the exception rather than the rule." The underlying landscape character of Area B is defined by the Mountain Massif — Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Distinctive tors on some summits, and occasional rocky cliffs; Trough-like glens, some with ribbon lakes; and Open, exposed, boulder-strewn summits rising above deep scooped corries, some with elevated lochans". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | The Development is located approximately 31 km from the areas of theoretical visibility within the Study Area – Area B. At this distance the wind turbines of the Development will appear as small features in the available, often panoramic views, from the upland plateau and peaks at the western fringes and core of the Cairngorm Mountains. The Development will be seen directly alongside the existing presence of the Operational Corriegarth Wind Farm, discernible in only the clearest of conditions. The Development will not reduce the domineering presence of the mountain massif, where the Northern Corries and Lairig Ghru will remain the key focus of views west from the core area (and defined by Area B), undiminished in scale or distinctiveness by the addition of this distant feature outwith the CNP (as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) and shown in Figure 6.39). Overall, a barely perceptible scale of change will be experienced across a small geographical extent, resulting in a barely perceptible magnitude of change. | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Negligible (not significant). | | |
| Surrounding hills | "Within a landscape of hills and plateaux, the central massif merely represents the extreme end of a rangeThe 'lesser hills' within the Park have their own ridges, summits and plateaux and would be impressive in any other location. They tend to be heather-covered, smooth and rounded, albeit with sudden unexpected crags, screes, gullies and glens. They contribute significantly to the wild, untamed | With regard to views from the <i>lesser hills</i> situated within the CNP, the ZTV shown on Figure 6.7b illustrates that the Development will not be evident from areas of the CNP beyond the core area of the Cairngorm Mountains and the eastern ridge of the Monadhliath Mountains. Situated to the west of the CNP the Monadhliath Mountains represent one of a range of surrounding hills which are evident in views from the CNP. The eastern ridge of the Monadhliath | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | |

| Assessment of SLC | Assessment of SLQs of Cairngorms National Park | | | | |
|--|---|--|--|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | |
| | appearance of the area, and many are easily accessible from the main roads." | forms the western boundary and backdrop to views from the interior of the CNP. | | | |
| | The underlying landscape character of Area A is defined by the <i>Rolling Uplands – Cairngorms LCT</i> and the following characteristics are judged to contribute to this SLQ: • "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills; and • Heather and upland grassland on higher ground often extending to lower slopes". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | Located on the western edge of the Monadhliath Mountains and approximately 10.3 km from the CNP at its nearest point, the Development will introduce visibility of additional wind turbines seen across the vast interior plateau. These additional wind turbines will not substantially diminish the existing wild, untamed appearance of the area which is currently influenced by the presence of other existing wind farms, including the Operational Corriegarth Wind Farm, experienced at similar distances in views across the plateau from the hill summits and ridges which form the western boundary of the CNP as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29). Overall, a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of | | | |
| Visual and Sensory | Qualities | change for this SLQ. | | | |
| | | | I = | | |
| Layers of receding ridge lines | "It is a landscape of receding and interlocking layers, comprising a series of gently undulating and ascending ridge lines visible when looking across to distant horizons. In hazy light these appear as hues of decreasing intensity, giving great depth to the landscape. Where ridges are not broken by human structures, the receding horizons reinforce the impression of natural landforms dominating. This quality is reflected in the logo of the Cairngorm National Park Authority." | Where seen from the western boundary of the CNP, defined in the Study Area as Area A, the Development will appear across a series of gently undulating and ascending ridge lines visible when looking across to distant horizons beyond the vast interior of the Monadhliath Mountains. The Development will appear alongside the Operational Corriegarth Wind Farm extending the horizontal proportion of the view occupied by wind turbines slightly, but remaining distinctly separate from the other clusters of the wind farms to the north (Dunmaglass, and Farr and Kyllachy) and south (Stronelairg) where visible. | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | |

| Assessment of SLQs of Cairngorms National Park | | | | |
|--|---|---|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | |
| | The underlying landscape character of Area A is defined by the <i>Rolling Uplands – Cairngorms LCT</i> and the following characteristics are judged to contribute to this SLQ: • "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: • "Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms, and • Distinctive tors on some summits, and occasional rocky cliffs". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | The Development will not bring wind turbines discernibly closer to the CNP boundary defined by the eastern ridge of the Monadhliath Mountains from where the layers of undistinctive ridges of the interior plateau will remain undeveloped and <i>not broken by human structures</i> . The wind turbines will be largely backclothed, with the most northerly turbines breaking the skyline in views from some elevated locations along the CNP boundary, as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29). Overall a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change for this SLQ. | | |
| Grand panoramas and framed views | "Vast and distant panoramic views are frequent throughout the Park, made possible by open landscapes and elevated viewpoints, and visibility and colours always highly susceptible to changing weather and season. Views range from broad pastoral straths of green, improved pasture; middle-distance open, rolling hills of brown heather moor, with woodland at lower levels; and far distant, exposed, wild mountain terrain. The assemblage of landscape features is aesthetically pleasing, with views often framed by vegetation and landform, and the eye led to an inviting arrangement of hill slopes and glens." | As illustrated by the ZTV shown on Figure 6.7b, the Development will not be evident from low lying straths and glens within the CNP. Visibility of the proposed wind turbines will be limited to elevated views from hill summits and ridges along the western boundary (10 km>) and longer distance views (31 km>) from the Cairngorm Mountains at the core of the CNP, from where the Development will appear alongside the Operational Corriegarth Wind Farm and in the context of other nearby wind farm developments (e.g. Stronelairg, Dunmaglass, Farr and Kyllachy etc.). Although the additional wind turbines of the Development will appear in a number of the <i>Vast and distant panoramic views</i> afforded from the eastern ridge of the Monadhliath Mountains | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | |

| Assessment of SLQs of Cairngorms National Park | | | | |
|---|--|--|---|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | |
| | The underlying landscape character of Area A is defined by the <i>Rolling Uplands – Cairngorms LCT</i> and the following characteristics are judged to contribute to this SLQ: • "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: • "A massive scale landscape; and • Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | (Area A) (as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain, (Figure 6.29) and the core area of the Cairngorm Mountains (Area B) (as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) and shown in Figure 6.39), these do not represent framed or iconic views. Views will be experienced at substantial distances of 10 km> within which the Development will form a small and sometimes undiscernible feature alongside the Operational Corriegarth Wind Farm, and limited to views outwith the CNP which are largely undistinctive in comparison to those experienced within the CNP, including those towards the core of the CNP from AESLQ1 to AESLQ5. Overall, a small scale of change will be experienced across a small geographical extent, resulting in a barely perceptible magnitude of change. | | |
| Wildlife and Natur | re | | | |
| Dominance of natural landforms | "The burns and rivers follow their natural courses, being largely unmodified by human activity. The lochs and lochans tend to be similarly unmodified, holding their natural water levels, and one of the largest natural wetlands in Britain is found at the Insh Marshes. Additionally, the extent and scale of the hills and mountains are such that natural landforms tend to dominate the scene, with any human modification being of a small-scale and incidental to the wider, outer landscape." The underlying landscape character of Area A is defined by the Rolling Uplands — Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: | The addition of the Development will not create a new focus in views from the western edge of the CNP (Area A) or western fringes of the Cairngorm Mountains (Area B), from where the wind turbines will be seen in the context of existing wind farm developments (as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33), AESLQ5: Carn Sgulain, (Figure 6.29) and AESLQ6: Ptarmigan Restaurant, Cairngorm (Figure 6.39). Seen at some considerable distance from Area A (c.10km) and Area B (c.40km) the additional wind turbines will appear as distant and small scale features, and although they will | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Negligible (not significant). | |

| Assessment of SLC | Assessment of SLQs of Cairngorms National Park | | | | | |
|--|---|---|--|--|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | | |
| | "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills; and Number of relatively isolated glens". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms; Distinctive tors on some summits, and occasional rocky cliffs; Trough-like glens, some with ribbon lakes; Open, exposed, boulder-strewn summits rising above deep scooped corries, some with elevated lochans; and Lack of settlement, just one or two steadings and the recreational infrastructure of ski centre, and tracks and footpaths". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | contribute further to the presence of <i>human modification</i> within the upland landscapes outwith the CNP, they will not alter the wider appreciation of the <i>scale of the hills and mountains</i> or distract from the <i>natural landforms</i> and dramatic scenery experienced in the immediate setting of both the Eastern Monadhliath Ridge (Area A) and the northern corries of the Cairngorms Mountains Massif (Area B). Overall, a barely perceptible scale of change will be experienced across a small geographical extent, resulting in a barely perceptible magnitude of change. | | | | |
| Wildness | "Other areas of the Park are less remote, but the preponderance of near natural vegetation, together with distinctive wildlife and the general lack of development, can still give a perception of the dominance of nature. This includes the managed grouse moors, and the ancient, managed woods and plantations. 'A sense of closeness and intensity of exposure to nature.' Drennan Watson (1990)' " | Effects on the wild land qualities experienced within the extents of Area A within WLA20: Monadhliath are considered in detail in Appendix A6.4: Wild Land Impact Assessment. The assessment has not identified significant effects on the wild land qualities of WLA20, with additional effects on the WLA limited to very small pockets of new visibility of wind turbines within the WLA and an increase in the existing effects arising from the presence of the Operational Corriegarth Wind Farm on the western periphery of the WLA. A large proportion of the WLA will be unaffected by the Development (as | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | | |

| Assessment of SL | Assessment of SLQs of Cairngorms National Park | | | | | |
|--|--|--|---|--|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | | |
| | The underlying landscape character of Area A is defined by the <i>Rolling Uplands – Cairngorms LCT</i> and the following characteristics are judged to contribute to this SLQ: • "Perception of relative remoteness". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | illustrated on Figure 6.17), and the additional wind turbines will affect only a small proportion of the WLA which is not already influenced by the presence of the Operational Corriegarth Wind Farm (as illustrated on Figure 6.18). The wild land qualities of WLA20 are expressed in locations along the western boundary of the CNP within the WLA, however the presence of wind farm developments on the western periphery of the WLA (Operational Corriegarth, Stronelairg, Dunmaglass and Farr Wind Farms) have diminished these qualities to some degree through the introduction of evident man-made development as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29). However, the addition of the Development will not substantially diminish these qualities further, and key wild land qualities of the WLA will remain evident elsewhere within areas of the CNP unaffected by wind farm development (e.g. east facing slopes of the Monadhliath ridge). Overall, a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change for this SLQ. | | | | |
| Wild Land | "The mountain core contains some of the wildest and remotest areas of Britain, where the vegetation is natural, artefacts are rare, nature is in charge, and the long walk-in is the only means of getting there. On the high plateaux, there are many miles of land above 3000ft (914m), exposed to the changeable and sometimes extreme Cairngorms' climate. There are few other places in Britain | Relating to the wild land and associated qualities found at the core of the CNP and defined by the Cairngorm Mountains Massif (and covered in part by the Study Area - Area B), the Development will have a very limited effect on the central core area of the CNP defined by the upland mountain plateau. As illustrated by the ZTV shown on Figure 6.7b, visibility of the additional wind turbines of the Development will be experienced at distances of over 31 km, from where these | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Negligible (not significant). | | | |

| Assessment of SL | Assessment of SLQs of Cairngorms National Park | | | | | |
|--|---|--|--|--|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | | |
| | where one can walk for so many miles away from roads, tracks and other human structures." The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Extensive, high-level sweeping plateaux, with smooth domes and corries among the rounded landforms; Lack of settlement, just one or two steadings and the recreational infrastructure of ski centre, and tracks and footpaths; and Exposed, remote and wild character". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | additional human structures will appear alongside the existing pattern of wind farms seen in long-distance views across the interior plateau of the Monadhliath Mountains (as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (LVIA VP19) and shown in Figure 6.39). The Development will not affect any areas of the CNP from where other existing wind farms are not already evident at a similar distance, and therefore the core area of the mountain plateau which contains some of the wildest and remotest areas of Britain and from where there is little or no evidence of roads, tracks and other human structures will remain unaffected. Overall a barely perceptible scale of change will be experienced across a small geographical extent, resulting in a barely perceptible magnitude of change. Assessment of WLA 15: Cairngorms has been scoped out in agreement with NatureScot, as detailed in Appendix A6.4: Wild Land Impact Assessment. | | | | |
| Recreation | | | | | | |
| A landscape of opportunities | "Since Victorian times, the outstanding scenery of the area has been a draw to visitors. The diverse landscapes lend themselves to a wide range of pursuits and it is one of the foremost localities for outdoor recreation in Britain. Whilst some visitors seek out the physical challenge of an extreme environment in extreme conditions, others choose physical endeavour in a more organised and safer setting. The high mountains are both alluring and forbidding, attracting climbers, walkers and winter sports enthusiasts. However, the rounded summits and gentle slopes can turn treacherous in sudden changes of weather, and being at | The Development will introduce further wind turbines into views experienced from the upland landscapes at the western boundary of the CNP (Area A) and the western fringes of the Cairngorm Mountains Massif (Area B). Receptors experiencing these views will generally be <i>climbers, walkers and winter sports enthusiasts</i> in addition to those working in these upland environments and engaged in estate management activities, who experience the presence of existing wind farm developments when undertaking these activities. For some receptors, the presence of these developments diminishes experience of accessing these upland landscapes for <i>the</i> | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | | |

| Assessment of SLC | Assessment of SLQs of Cairngorms National Park | | | | | |
|--|---|---|--|--|--|--|
| Stage 1 | Stage 2 | Stage 3 | Stage 4 | | | |
| Identification of relevant SLQs within the Study Area | The Key Landscape Characteristics that underpin the SLQs | Impact of the proposal on underpinning characteristics and the effects on SLQs | Consideration of proposed mitigation and timescales, level of impact | | | |
| | the mercy of the elements can be an added attraction and source of exhilaration. But it is not just the highest mountains that attract people to the outdoors. Active pursuits on the lower ground include water sports, cycling and horse-riding, together with the traditional sporting pursuits of deer-stalking, grouse shooting and fishing. There are also many who are content to enjoy gentler and less challenging pursuits, whether low level walking, bird-watching, exploring the past, or simply enjoying the scenery. However, all derive pleasure directly from what the landscape has to offer." The underlying landscape character of Area A is defined by the Rolling Uplands – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Lack of settlement, just one or two steadings and the recreational infrastructure of ski centre, and tracks and footpaths". The susceptibility of this SLQ to the type and scale of development proposed is considered to be medium, and overall sensitivity is judged to be high. | physical challenge of an extreme environment in extreme conditions; however, given the extent and proximity of these existing developments and the relatively limited additional influence the Development will introduce, the addition of Development will not substantially diminish the alluring and forbidding nature of the high mountains found within Area A and Area B. Receptors recreating in the lowland areas of the CNP, where activities include water sports, cycling and horse-riding, together with the traditional sporting pursuits of and fishing will be unaffected by the Development. Overall a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change for this SLQ. | | | | |

| Assessment of SL | Assessment of SLQs of Cairngorms National Park | | | | | |
|--|--|--|--|--|--|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | | | |
| Spirituality | "For those seeking peace and escape from modern intrusions, solitude in this vast landscape can be readily found. Whether it is sought on the highest exposed peaks, the still calm of a pine forest or far into the heather-clad hills, the beauty of the landscape and dominance of nature prevails." The underlying landscape character of Area A is defined by the Rolling Uplands – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Perception of relative remoteness". The underlying landscape character of Area B is defined by the Mountain Massif – Cairngorms LCT and the following characteristics are judged to contribute to this SLQ: "Exposed, remote and wild character". The susceptibility of this SLQ to the type and scale of development proposed is considered to be high, and overall sensitivity is judged to be high. | The presence of existing wind farm developments located to the north-west, west and south-west of Area A at the western boundary of the CNP has diminished the <i>peace and escape from modern intrusions,</i> and <i>solitude in this vast landscape.</i> The Munro summits along the CNP boundary act as a gateway to the more remote hills within the interior of the Monadhliath Mountains. Whilst the presence of tracks and footpaths that allow for access to these summits on the park boundary may decrease the sense of wildness, access into the interior of the Monadhliath is perceptibly more difficult. However, the influence of existing wind farm development throughout this area is strong and is experienced from the highest summits and ridges which define the boundary of the CNP, and sequential visual effects are experienced by receptors as they passes through this landscape where the sense of solitude and absence of human interventions has been substantially diminished (as illustrated by AESLQ1: Càrn Ban (Figure 6.42), AESLQ2: Càrn an Fhreiceadain (Figure 6.43), AESLQ3: A'Chailleach (Figure 6.44), AESLQ4: Geal Charn (Figure 6.33) and AESLQ5: Carn Sgulain (Figure 6.29). From the more distant Area B, the sense of <i>peace</i> and <i>solitude</i> is strong. Despite views of existing wind farm developments across the Monadhliath Mountains, they remain distant features which do not diminish the experience of this SLQ within the core of the CNP. Nevertheless, areas surrounding the Cairngorm Ski Centre are easily accessible to a range of different receptors, and are experienced in the context of road and ski lift infrastructure which affects the sense of wildness experienced, as illustrated by AESLQ6: Ptarmigan Restaurant, Cairngorm (Figure 6.39). However, hill summits to the southwest (Braeriach) exhibit a lesser degree of human influence, requiring a much longer and committing approach to the more | Taking account of the judgements of sensitivity and magnitude of change, the effect on this SLQ will be Minor (not significant). | | | |

| Assessment of SLQs of Cairngorms National Park | | | | |
|--|--|--|---|--|
| Stage 1 Identification of relevant SLQs within the Study Area | Stage 2 The Key Landscape Characteristics that underpin the SLQs | Stage 3 Impact of the proposal on underpinning characteristics and the effects on SLQs | Stage 4 Consideration of proposed mitigation and timescales, level of impact | |
| | | remote highest exposed peaks and where the dominance of nature prevails. Overall a small scale of change will be experienced across a small geographical extent, resulting in a low magnitude of change for this SLQ. | | |

A6.3.7 STEP 4 - SUMMARY OF IMPACTS ON THE SLQS, IMPLICATIONS FOR THE CNP AND POSSIBLE FUTURE EFFECTS ON SLQS AND RECOMMENDATIONS FOR MITIGATION

A6.3.7.1 Summary

In summary, none of the SLQs considered in this assessment are judged to experience significant effects as a consequence of the introduction of the Development. Visibility of the Development is limited to upland landscapes within the CNP as illustrated by the ZTV shown on Figure 6.7b and defined by Area A along the eastern Monadhliath Ridge and Area B at the western fringes of the Cairngorm Mountains Massif. Views of the Development will be experienced almost exclusively by receptors recreating (e.g. accessing popular Munro and other hill summits via well used and promoted routes) or working (e.g. carrying out activities related to upland hill farming or sporting estate management) in these uninhabited upland landscapes of the CNP.

As a consequence the SLQs which were considered likely to be affected by the Development are limited, and have generally all experienced a degree of impact arising from the introduction of existing wind farm developments located to the north-west, west and south-west of the CNP across the extensive interior plateau of the Monadhliath Mountains.

The Development will lead to indirect effects experienced from a relatively small geographical area of the CNP, exclusively affecting these elevated areas and summits, from where the wind turbines of the Development will appear consistent with the existing pattern of wind energy development in the landscapes outwith the CNP and as a coherent extension to the Operational Corriegarth Wind Farm.

A6.3.7.2 Conclusion

NPs are deemed to be of national importance for their natural and cultural heritage (para 84. SPP), and are afforded the highest level of protection within NPF3 and SPP. Although SPP is clear that wind farm development will not be acceptable within NPs and NSAs (Table 1, SPP), development which is sited outwith a NP but with the potential to affect it should also be considered in respect of the four key aims of NP policy (paras 84 and 85, SPP). In this respect development should conserve and enhance the natural and cultural heritage of the area, and in relation to the landscapes of the NP this relates specifically to the defined SLOs.

The assessment of SLQs has established that the Development will not compromise any of the defined SLQs of the Cairngorms National Park.

In this instance, the Development consolidates the existing influence of wind farm development to the west of the CNP by way of an extension to the Operational Corriegarth Wind Farm, and has been sited and designed (as set out in Chapter 3) in order to minimise as far as possible, the opportunity for additional adverse effects on the CNP and its defined SLQs. Significant effects on these SLQs are judged to have been overcome through sensitive siting and design of the Development.

In conclusion, the adverse effects on the SLQs of the CNP identified within the assessment are judged not to undermine the objectives for its protection, and the overall integrity of the CNP will not be compromised by the introduction of the Development.

ANNEX - Fieldwork photographs: AESLQs



Inset Image A6.3.1: Agricultural land with Glen Banchor near historic townships, demonstrating the experience of a landscape of layers, and the transition from the inhabited strath to the uninhabited upland to the west. (Approx. NGR: 268104, 799522)



Inset Image A6.3.2: Estate track access from Glen Banchor towards the Munro hill summit of Carn Dearg (946 m AOD) and Monadhliath Ridge which forms the western boundary of the CNP. The transition from inhabited strath to remote, uninhabited upland is evident to recreational receptors using this and similar tracks which provide access to the uplands at the edge of the CNP and into the interior of WLA 20. (Approx. NGR: 266182, 801876)



Inset Image A6.3.3: Approach to Carn Dearg (946 m AOD) via Allt Fionndrigh from Glen Banchor, where the transition from *inhabited strath to remote, uninhabited upland* is evident, and a sense of *wildness* becomes more apparent as receptors access the more remote upland landscapes at the western edge of the CNP. (Approx. NGR: 265954, 801930)



Inset Image A6.3.4: As receptors gain elevation towards the Monadhliath Ridge, which forms the western boundary of the CNP, the *vastness of space, scale and height* of the enclosing hills, such as Carn Dearg (946 m AOD), becomes apparent and an increased sense of *wildness*, remoteness, isolation is experienced. (Approx. NGR: 265192, 801740)



Inset I mage A6.3.5: The distinguishable and physically challenging hill summits such as Carn Dearg (946 m AOD) provide a draw to visitors within this part of the CNP, from where views to the surrounding hills and neighbouring glens such as Creag Meagaidh, the Grey Corries and Nevis Range to the south-west become evident. (Approx. NGR: 263551, 802398)



Inset I mage A6.3.6: From the Monadhliath Ridge, which forms the western boundary of the CNP, long-distance panoramic views are possible, including westwards across the vast interior of the Monadhliath Mountains to the Central Highlands. From Carn Dearg (946 m AOD) and neighbouring summits within the boundary of the CNP the existing Bhlaraidh Wind Farm is a discernible feature in views across the layers of receding ridge lines appearing backclothed against the distant surrounding hills. (Approx. NGR: 263479, 802550)



Inset Image A6.3.7: The Beauly-Denny Electricity Transmission Line, found within the settled strath near Garva Bridge and within the boundary of the CNP, is experienced by receptors accessing remote hill summits such as Geal Charn (926 m AOD) (Assessment Point 4) found along the western boundary of the CNP. (Approx. NGR: 253215, 793946)



Inset Image A6.3.8: The approach to Geal Charn (926 m AOD) (Assessment Point 4) and the boundary of the CNP from Garva Bridge, with the *vastness* of the Monadhliath interior currently imperceptible beyond. The transition from *inhabited strath to remote, uninhabited upland* brings an increased sense of wildness, isolation and potential *spirituality*. (Approx. NGR: 253452, 796013)



Inset Image A6.3.9: Stronelairg Wind Farm from near to the summit of Geal Charn (926 m AOD) (Assessment Point 4) on the western boundary of the CNP, which despite its presence at close proximity, the vastness of space, scale and height of the surrounding hills of the Monadhliath Mountains and their interior plateau can still be appreciated. (Approx. NGR: 255797, 798527)



Inset I mage A6.3.10: Views south-west from Carn Ban (942 m AOD) (Assessment Point 1) along the southwestern boundary of the CNP towards Creag Meagaidh, the Grey Corries and Nevis Range, are defined by layers of receding ridge lines which make distance and scale somewhat difficult to discern. (Approx. NGR: 263135, 803313)



Inset Image A6.3.11: The vastness of space, scale and height of the interior of the Monadhliath Mountains can be fully appreciated from hill summits such as Carn Ban (942 m AOD) (Assessment Point 1) at the western boundary of the CNP, which provide a substantial physical challenge and sense of achievement to recreational visitors. Existing wind farm developments are evident beyond the extents of WLA 20 to the south-west, west and north-west, however they appear as relatively small and insignificant features in comparison to the large scale and simple landscape of these intervening surrounding hills within the interior of the Monadhliath Mountains. (Approx. NGR: 263130, 803327)



Inset Image A6.3.12: Panoramic views east, north-eastwards across the western extents of the CNP to the Cairngorm Mountains massif from Carn Ban (942 m AOD) (Assessment Point 1). Layers of receding ridge lines are evident, falling away towards Strathspey beyond, and where the landscape of layers, from inhabited strath to remote, uninhabited upland through which receptors have often travelled to reach the hill summit becomes apparent. (Approx. NGR: 263171, 803316)



Inset Image A6.3.13: View out from the CNP across the *vastness of space* which is characteristic of the interior of the Monadhliath from the Munro hill summit of Carn Sgulain (920 m AOD) (Assessment Point 5) on the boundary of the CNP. Despite the presence of wind farms beyond the extents of WLA 20 they appear as relatively small and insignificant features in comparison to the large scale and simple landscape of the plateau interior. (Approx. NGR: 268305, 805814)



Inset Image A6.3.14: Views from within the western extents of the CNP are limited to elevated hill summits such as A'Chailleach (930 m AOD) (Assessment Point 3), set back slightly from the boundary formed by the Monadhliath Ridge. Layers of receding ridge lines in long-distance often panoramic views are possible, within which the vastness of space, scale and height and relative wildness and emptiness of these surrounding hills can be appreciated. (Approx. NGR: 268123, 804175) (Approx. NGR: 268097, 804195)



CORRIEGARTH 2 WIND FARM

APPENDIX A6.4

WILD LAND IMPACT ASSESSMENT

2020





A6.4 WILD LAND IMPACT ASSESSMENT

A6.4.1 INTRODUCTION

This wild land impact assessment is independent of, but draws upon, the Landscape and Visual Impact Assessment (LVIA) contained in Chapter 6: Landscape and Visual Amenity of the EIA Report, providing specific additional detail in respect of potential effects on the key attributes and qualities of Wild Land Areas (WLAs).

Due to the presence of WLAs within the Study Area for the LVIA, there was potential for visibility of wind turbines of the Development to result in significant effects on the wild land qualities of the WLA, and therefore necessary to prepare a wild land impact assessment to supplement the LVIA.

In preparing this wild land impact assessment, Chartered Landscape Architects from LUC have engaged with NatureScot (formerly known as Scottish Natural Heritage (SNH)¹) to agree the approach, scope and presentation of the assessment as requested in NatureScot's scoping response (dated 18th March 2020, and detailed in Table 6.1 contained in Chapter 6 of the EIA Report) Figures and visualisations referred to within this assessment can be found in EIA Report Volume 2b: LVIA Figures and EIA Report Volume 2c: NatureScot LVIA Visualisations.

In recent years NatureScot has published two guidance documents relating to the assessment of potential impacts upon wild land in Scotland. The most recent, 'Assessing Impacts on Wild Land Areas - Technical Guidance' (SNH, 2017)² was subject to consultation which concluded in April 2017³.

On 28th September 2020, NatureScot published finalised technical guidance⁴ to be used for the assessment of effects on wild land areas. The assessment presented in this appendix was undertaken in accordance with the 2017 draft guidance prior to the publication of the final technical guidance; however, a review of the final guidance has been undertaken to ensure the approach taken to the assessment is consistent with the finalised 2020 guidance.

A6.4.2 CONTEXT TO WILD LAND IN SCOTLAND

Areas of Scotland which exhibit strong indicators of wildness, have been identified by NatureScot and are known as WLAs. These are not designated but their importance is formally recognised in National Planning Framework 3 (NPF3) and in Scottish Planning Policy (SPP). NPF3 recognises wild land as a "nationally important asset" (NPF3, Para. 4.4, Page 42) while SPP notes that development plans "should identify and safeguard the character of areas of wild land" (SPP, Para. 200, Page 47). Although not a statutory designation, WLAs and their component qualities of wildness require protection.

With regard to onshore wind development, SPP (Table 1, Page 39) categorises WLAs as "Group 2: Areas of significant protection". The same table categorises National Parks and National Scenic Areas as "Group 1: Areas where wind farms will not be acceptable".

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¹ Scottish Natural Heritage (SNH) rebranded in August 2020 as NatureScot. Where relevant, reference is still made to SNH within this chapter in respect of guidance which remains valid and is yet to be updated or republished.

² SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

³ Responses to the consultation were published online and were considered by NatureScot prior to finalisation of the guidance: https://www.nature.scot/assessing-impacts-wild-land-technical-guidance-2017

⁴ NatureScot (September 2020). Assessing Impacts on Wild Land Areas – Technical Guidance. [Online] Available at: https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance (Accessed 28/09/2020)

WLAs are therefore protected but not to the same level as nationally designated landscapes and therefore, as a matter of national policy, WLAs do not have the same level of protection as National Parks and National Scenic Areas.

The table also explains that in Group 2 "areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation". It therefore follows that wind farm development within a WLA is not precluded but that a wind farm proposal must be developed with cognisance of the WLA and the need to protect it.

This is supported by statements in Annex 1 to NatureScot's publication 'Spatial Planning for Onshore Wind Turbines - Natural Heritage Considerations' (SNH, 2015) which state that, in relation to the landscape objectives for accommodation of wind farms in the Scottish landscape, WLAs (unlike NSAs) may be considered suitable for the development of wind farms: "Within local landscape designations and Wild Land Areas, the degree of landscape protection will be less than for National Scenic Areas. In these areas, an appropriate objective may be to accommodate wind farms, rather than seek landscape protection."

The location and extents of WLAs were published by NatureScot in 2014, superseding earlier 'Search Areas for Wild Land' (SNH, 2002) and 'Core Areas of Wild Land' (SNH, $2014)^{5}$. NatureScot's identification of WLAs was a phased approach, as set out in 'Mapping of Scotland's Wildness and Wild Land: Non-technical Description of the Methodology' (SNH, June 2014⁶).

The first stage in this process was to identify indicators of potential wildness according to four attributes:

- Perceived naturalness of land cover:
- The ruggedness of the terrain which is therefore challenging to cross;
- Remoteness from public roads, ferries or railway stations;
- The lack of visible buildings, roads, pylons and other modern artefacts.

Areas were scored in relation to these four attributes and the largest areas with the highest scores were identified. Informed judgement then confirmed which of these areas merited selection as a WLA.

The opening paragraph of the 2017 draft guidance explained: "Wildness is a quality which people experience. Wild land areas are the most extensive areas where these qualities are best expressed. Physical attributes and perceptual responses are the measure by which changes in experience are to be assessed". Wild land qualities are therefore a combination of physical attributes and perceptual responses to them; the former being relatively easy to define and the latter being a more personal reaction.

NatureScot published descriptions for each of the 42 WLAs within which the wild land qualities (physical and perceptual) particular to each WLA are described under the heading of "Key attributes and qualities of the wild land area". The 2017 draft guidance required that these should form the starting point for an assessment of impacts on a WLA, and notes that the "strength to which the wild land qualities are expressed will vary in different parts of the WLA", but that in general they will "strengthen progressively as

⁵ SNH (2014), Core Areas of Wild Land 2013 Map - Advice to Government - 16th June 2014. [Online] Available at: https://www.nature.scot/naturescot-core-areas-wild-land-map-consultation-paper-and-advice-government (Accessed 06/10/2020)

⁶ SNH (2014), Mapping Scotland's Wildness. [Online] Available at: https://www.nature.scot/mapping-scotlandswildness-and-wild-land-non-technical-description-methodology (Accessed 06/10/2020)

⁷ SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

a person moves into a WLA" (para 18). This is reflected in the final technical guidance (para 20).

It is understood that the approach to the assessment of impacts on WLAs is still evolving, and until such time that the draft guidance is updated and final guidance published, NatureScot will provide advice to developers and consultants as they refine their own approach to undertaking wild land impact assessments.

In evidence for the public inquiry for Limekiln 2 and Drum Hollistan wind farms⁸ in 2018, NatureScot provided supplementary information⁹, in respect of the approach to wild land impact appraisal. The paper is based on the 2017 guidance and is also "*informed by responses to SNH's consultation on the draft guidance and experience of the application of the methodology used in undertaking appraisals*" of impacts of development on WLAs.

The guidance goes on to list the *physical attributes* of a WLA as:

- "A high degree of perceived naturalness;"
- The lack of modern human artefacts or structures;
- Little evidence of contemporary land uses;
- Landform which is rugged, or otherwise physically challenging; and
- Remoteness and / or inaccessibility'.

Whilst the *perceptual responses* evoked by these physical attributes include:

- "A sense of sanctuary or solitude;
- Risk or, for some visitors, a sense of awe or anxiety;
- Perceptions that the landscape has arresting or inspiring qualities;
- Fulfilment from the physical challenge required to penetrate into these places".

The approach to the assessment of impacts on WLAs has developed since the draft guidance was published in 2017, and until the recent publication of the final guidance NatureScot has provided advice to developers and consultants as they refine their own approach to undertaking wild land impact assessments for particular development proposals.

In evidence for the public inquiry for Limekiln 2 and Drum Hollistan wind farms¹⁰ in 2018, NatureScot provided supplementary information⁹, in respect of the approach to wild land impact appraisal. The paper is based on the 2017 guidance and is also "*informed by responses to SNH's consultation on the draft guidance and experience of the application of the methodology used in undertaking appraisals*" of impacts of development on WLAs.

The approach to wild land impact assessment undertaken by different consultants since publication of the draft guidance has inevitably varied proportionately to reflect the nature and scale of the proposed development being assessed, its location within or in proximity to wild land, and the potential effects which may arise as a consequence.

A6.4.3 APPROACH AND METHODOLOGY

A6.4.1.1 Guidance and Reference

The following list identifies all key documents and sources of information used in preparing the assessment:

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⁸ The Scottish Government Planning and Environmental Appeals Division DPEA case references: WIN-270-9 (Drum Hollistan) and WIN-270-1 (Limekiln 2)

⁹ SNH (2015), SNH8 Supplementary Information on Wild Land Impact Appraisal. Inquiry Evidence for DPEA case references: WIN-270-9 (Drum Hollistan) and WIN-270-1 (Limekiln 2). Provided via email from SNH 05/05/2020. ¹⁰ The Scottish Government Planning and Environmental Appeals Division DPEA case references: WIN-270-9 (Drum Hollistan) and WIN-270-1 (Limekiln 2)

- Assessing Impacts on Wild Land Areas Technical Guidance¹¹;
- Assessing impacts on Wild Land Areas technical guidance draft¹²; Assessing the Impacts on Wild Land, Interim Guidance Note¹³;
- Scotland's Wild Land Area Descriptions: methodology¹⁴;
- Description of Wild Land Areas Monadhliath Wild Land Area¹⁵; Descriptions of Wild Land Areas Central Highlands Wild Land Area¹⁶;
- Descriptions of Wild Land Areas Kinlochourn Knoydart Morar Wild Land Area¹⁷; Description of Wild Land Areas – Braeroy - Glenshirra - Creag Meagaidh Wild Land Area¹⁸; Description of Wild Land Areas – Rannoch - Nevis - Mamores - Alder Wild Land Area¹⁹; Description of Wild Land Areas – Cairngorms Wild Land Area²⁰;
- Core Areas of Wild Land 2013 Map Advice to Government 16th June 2014²¹; Mapping Scotland's Wildness²²; SNH8 – Limekiln and Drum Hollistan Wind Farm Inquiry – Supplementary Information on Wild Land Appraisal²³;
- Wildness in Scotland's Countryside, Policy Statement No. 02/03²⁴. Assessing the cumulative impact of onshore wind energy developments²⁵; Spatial Planning for Onshore Wind Turbines natural heritage considerations, Guidance²⁶;; and

NatureScot (September 2020). Assessing Impacts on Wild Land Areas – Technical Guidance. [Online] Available at: https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance (Accessed 28/09/2020)
 SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at:

https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

¹³ SNH (2014), Assessing the Impacts on Wild Land, Interim Guidance Note.

¹⁴ SNH (2017), Scotland's Wild Land Area Descriptions: methodology.

¹⁵ SNH (2017), Description of Wild Land Areas – Monadhliath Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Monadhliath-July-2016-20.pdf (Accessed 06/10/2020)

¹⁶ SNH (2017), Descriptions of Wild Land Areas – Central Highlands Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Central-Highlands-July-2016-24.pdf (Accessed 06/10/2020)

¹⁷ SNH (2017), Descriptions of Wild Land Areas – Kinlochourn - Knoydart – Morar Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Kinlochhourn-Knoydart-Morar-July2016-18.pdf (Accessed 06/10/2020)

¹⁸ SNH (2017), Description of Wild Land Areas – Braeroy - Glenshirra - Creag Meagaidh Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Braeroy-Glenshirra-Creag-Meagaidh-July-2016-19.pdf (Accessed 06/10/2020)

¹⁹ SNH (2017), Description of Wild Land Areas – Rannoch - Nevis - Mamores - Alder Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Rannoch-Nevis-Mamores-Alder-July-2016-14.pdf (Accessed 06/10/2020)

²⁰²⁰ SNH (2017), Description of Wild Land Areas – Cairngorms Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Cairngorm-January-2017-15.pdf (Accessed 06/10/2020)

²¹ SNH (2014), Core Areas of Wild Land 2013 Map - Advice to Government – 16th June 2014. [Online] Available at: https://www.nature.scot/naturescot-core-areas-wild-land-map-consultation-paper-and-advice-government (Accessed 06/10/2020)

²² SNH (2014), Mapping Scotland's Wildness. [Online] Available at: https://www.nature.scot/mapping-scotlands-wildness-and-wild-land-non-technical-description-methodology (Accessed 06/10/2020)

²³ SNH (2015), SNH8 SUPPLEMENTARY INFORMATION ON WILD LAND IMPACT APPRAISAL. Inquiry Evidence for DPEA case references: WIN-270-9 (Drum Hollistan) and WIN-270-1 (Limekiln 2). Provided via email from SNH 05/05/2020.

²⁴ SNH (2003), Wildness in Scotland's Countryside, Policy Statement No. 02/03. [Online] Available at: https://www.nature.scot/sites/default/files/2019-10/Wildness%20in%20Scotland%27s%20Countryside%20-%20Policy%20Statement.pdf (Accessed 06/10/2020)

²⁵ Scottish Natural Heritage (SNH) (2012), Assessing the cumulative impact of onshore wind energy developments. [Online] Available at: https://www.nature.scot/guidance-assessing-cumulative-impact-onshore-wind-energy-developments (Accessed 06/10/2020)

²⁶ SNH (2015), Spatial Planning for Onshore Wind Turbines – natural heritage considerations, Guidance. [Online] Available at: https://www.nature.scot/sites/default/files/2019-10/Guidance%20-

^{%20}Spatial%20Planning%20for%20Onshore%20Wind%20Turbines%20-

^{%20}natural%20heritage%20considerations%20-%20June%202015.pdf (Accessed 06/10/2020)

- A6.4.1.2 Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)²⁷.Data Sources
 - Ordnance Survey (OS) maps;
 - OS 'Terrain50' and 'Terrain5' Digital Terrain Model; and
 - SNHi Natural Spaces (GIS data for wild land and attribute mapping).

A6.4.1.3 Methodology

The assessment methodology is based upon the draft and final 'Assessing Impacts on Wild Land Areas - Technical Guidance' (SNH, 2017²⁸ and 2020²⁹) and further clarification received during consultation with NatureScot. The assessment considers potential effects on both the physical and perceptual attributes and qualities of wild land. The five step process is described in the guidance and each step is described below.

Step 1 - Define the study area and the scope of the assessment

"Identify a study area appropriate to the scale of development and extent of likely significant effects on the WLA."

The study area should reflect the extent of the likely effects on WLAs, including any cumulative effects.

- The scale of development and extent of effects;
- The extent of visibility;
- Routes and movement through the WLA;
- The wild land qualities likely to be affected; and
- The potential for cumulative effects.

Zones of Theoretical Visibility (ZTVs) and Cumulative ZTVs (CZTVs) are prepared to illustrate the theoretical visibility of the Development, and the influence of other operational, consented and proposed wind farms across WLAs within the Study Area. The ZTVs are based on a 'bare ground' computer generated terrain model, which does not take account of potential screening by buildings or vegetation or of atmospheric conditions, and therefore represents a 'maximum potential visibility' scenario (details of how the ZTVs are generated provided in Appendix A6.2: ZTV and Visualisation Methodology.

The ZTVs and CZTVs are used to inform the selection of WLAs to be considered in the wild land impact assessment, and the identification of the Study Area(s) to be considered for each WLA. The ZTV also informs the selection of the wild land assessment points to be used, and from which visualisations are prepared to illustrate the effects of the Development (along with cumulative effects in conjunction with other evident operational, consented and proposed wind farms) on particular wild land qualities.

Not all wild land qualities of a particular WLA will necessarily require consideration within the detailed assessment. It is necessary, based on the type and scale of development proposed, and the nature of the wild land qualities to determine whether each in turn could be affected by the Development. This exercise should also consider how both the physical attributes and/or perceptual responses associated with the particular wild land quality could be affected.

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²⁷ Landscape Institute and the Institute of Environmental Assessment (2013), Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)

²⁸ SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

²⁹ NatureScot (September 2020). Assessing Impacts on Wild Land Areas – Technical Guidance. [Online] Available at: https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance (Accessed 28/09/2020)

Step 2 - Verify the WLA Baseline

"Confirm the wild land qualities of the study area and the nature of their contribution to the WLA. The assessment should identify which qualities are likely to be significantly affected by the proposal"

When reviewing the baseline, the following are undertaken:

- Establish and describe the extent or strength to which physical and perceptual attributes which contribute to wild land qualities of the WLA are present;
- Describe the character and condition of the area affected and its contribution to the wild land areas as a whole, and how this may vary progressively as a receptor moves through a WLA; and
- Identify changes which may have individually or collectively have affected the appreciation of the baseline wild land qualities (as described in the WLA descriptions).

The WLA descriptions (SNH, 2017) set out the key attributes and qualities of each WLA. As directed by the assessment guidance, this information has been supplemented by site visits.

Step 3 - Assess the sensitivity of the WLA qualities

"Identify which wild land qualities of the WLA, including the physical attributes and perceptual responses that contribute to those qualities, are most sensitive to the type and scale of change proposed"

In accordance with their nationally important status set out in NPF3, WLAs are judged to be of high value. However, their susceptibility to different forms of development will vary according to the particular wild land qualities (and relevant physical attributes and perceptual responses), to what extent they are intact and the scale and likely effect of different development types on such qualities.

Sensitivity and susceptibility are sometimes used interchangeably in respect to LVIA; however, in accordance with the approach advocated by GLVIA330, the assessment considers both value and susceptibility to inform an overall judgement of sensitivity.

The sensitivity of the wild land qualities, and the relevant physical attributes and perceptual responses, is informed by the WLA descriptions and fieldwork (the Annex to this assessment contains photographs taken during fieldwork).

The assessment therefore considers the sensitivity of wild land qualities to the specific type and scale of development, and is classified as High, Medium or Low.

Step 4 - Assess the effects

"Given the size or scale of change, extent and duration, describe the effects on individual qualities and / or combinations of qualities, drawing out which physical attributes and perceptual responses will be affected and how, and the potential for mitigation"

The assessment of effects on wild land qualities is undertaken in accordance with the principles of GLVIA3, combining professional judgement on the size or scale of change, geographical extent of the area influenced, and the duration and reversibility of the change and combined to consider the overall effect (magnitude of change). In all cases, effects are considered to be adverse, duration is considered to be long-term³¹ (in excess of 10 years), and reversibility is considered to be reversible or partially reversible, unless

³⁰ Landscape Institute and the Institute of Environmental Assessment (2013). Guidelines for Landscape and Visual Impact Assessment, 3rd Edition

³¹ Assessment considers effects arising during the operational (long-term) phase of the project only.

otherwise stated. The assessment considers effects on the attributes and qualities of the WLA as they are experienced from within, not outside, the WLA.

The effects on wild land qualities are described as High, Medium, Low or Negligible.

Step 5 – Judgement of the significance of effect

"Judgement of the significance of effect: Describe the significance of residual effects on the wild land qualities of the Wild Land Area. This should take into account mitigation."

The assessment concludes with an overall judgement on the significance of effects on each wild land quality of the WLA and is undertaken in accordance with the principles of GLVIA3. Where appropriate, potential mitigation measures may be identified to further reduce the identified effects, which may result in a subsequent judgement of the residual effects following implementation of these measures.

As advocated by the guidance (SNH, 2020³²) the assessment is set out in accordance with the above key steps, presenting a transparent assessment with clear reasoning for the effects and complexity of effects identified.

A6.4.4 STEP 1 - DEFINING THE STUDY AREA AND THE SCOPE OF THE ASSESSMENT

A6.4.1.4 WLAs within LVIA Study Area

Whilst the Development is located outside any WLA, this assessment considers the potential for effects upon WLAs located within the 40 km radius Study Area used for the LVIA and focuses on those which may be indirectly affected by the introduction of the Development.

Figure 6.7a and Error! Reference source not found. detail the WLAs located within the Study Area, and the ZTV illustrated on Figure 6.7b indicates the extent of theoretical visibility of the Development across each of these WLAs.

Table A6.4.1 Wild Land Areas within LVIA Study Area

| WLA | Location and distance ³³ | Potential for effects on wild land qualities |
|---|-------------------------------------|---|
| WLA 20: Monadhliath | Located <1 km east of the Site | Development located in close proximity to western boundary of WLA and will likely extend the existing influence of the Operational Corriegarth Wind Farm indirectly on the physical attributes and perceptual responses of the WLA. |
| | | Considered in assessment. |
| WLA 19: Braeroy - Glenshirra - Creag Meagaidh | Located 20 km southwest of the Site | Given the distance and presence of other intervening developments in views from this WLA, attributes and qualities of the WLA will not be significantly compromised. WLA not considered in detailed assessment. |
| | | WEATHOR CONSIDERED III detailed assessment. |
| WLA 24: Central Highlands | Located 21 km west of the Site | Given the distance and presence of other intervening developments in views from this WLA, attributes and qualities of the WLA will not be significantly compromised. |

³² NatureScot (September 2020). Assessing Impacts on Wild Land Areas – Technical Guidance. [Online] Available at: https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance (Accessed 28/09/2020)

³³ To nearest turbine within the Development

| WLA | Location and distance ³³ | Potential for effects on wild land qualities |
|--|--|--|
| | | WLA not considered in detailed assessment. |
| WLA 15: Cairngorms | Located 23 km south- east of the Site | Given the intervening distance and limited visibility indicated by the ZTV, attributes and qualities of the WLA will not be significantly compromised. |
| | | WLA not considered in detailed assessment. |
| WLA 14: Rannoch - Nevis - Mamores – Alder | Located 25 km south of the Site | Given the distance and presence of other intervening developments in views from this WLA, attributes and qualities of the WLA will not be significantly compromised. |
| | | WLA not considered in detailed assessment. |
| WLA 18: Kinlochhourn - Knoydart – Morar | Located 36 km southwest of the Site | Given the intervening distance and limited visibility indicated by the ZTV, attributes and qualities of the WLA will not be significantly compromised. |
| | | WLA not considered in detailed assessment. |

Given the intervening distance between the Development and the majority of the WLAs listed above, the key attributes and qualities of these WLAs are not considered likely to be significantly compromised by the introduction of the Development, and have therefore not been considered in the detailed assessment³⁴. The wild land impact assessment therefore only considers the potential effects on the wild land qualities of WLA 20: Monadhliath.

A6.4.1.5 Study Area and Scope of Assessment - WLA 20: Monadhliath

WLA 20 lies directly east, south-east of the Site, extending approximately 15 km south and 25 km east of the Development and the wind turbines of the existing Corriegarth Wind Farm. The majority of effects on wild land qualities are expected to be experienced closest to the Site across the western extents of the WLA, and extending to approximately 10 km south, south-east and 15 km east of the proposed wind turbines.

4.1.5.1 Scale of Development and extent of effects

The Development is not located within WLA 20, and therefore there will be no direct impacts upon physical attributes of the WLA. However, as illustrated on Figure 6.7a, the boundary of WLA 20 is approximately 0.3 km from the nearest wind turbine of the Development.

It is worth noting that the 2017 draft guidance³⁵ states that "*The protection of wild land qualities, as set out in SPP, means that only in exceptional circumstances relating to scale, siting or design will development outwith WLAs have a significant effect"* (para 25), whilst SPP is clear that "*Buffer zones should not be established around areas designated for their natural heritage importance.*" (para 196).

The elements of the Development likely to indirectly affect the qualities of WLA 20 are the 16 proposed wind turbines of up to 149.9 m blade tip height (approximately 133 m rotor diameter and approximately 83.4 m hub height), and to a lesser extent the associated ancillary infrastructure (e.g. access tracks, onsite substation and control

³⁴ WLAs to be considered in detailed assessment agreed with SNH during meeting 6th April 2020.

³⁵ SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

building). However, beyond the immediate western periphery of the WLA in close proximity to the Site (within approximately 1 km) this infrastructure will be largely indiscernible.

4.1.5.2 Extent of Visibility

The ZTV shown on Figure 6.7b indicates theoretical visibility across a relatively large proportion of the WLA, from where indirect effects upon parts of the WLA may occur. This will predominantly be experienced in conjunction with the Operational Corriegarth Wind Farm which extends to the north, east and south. The 23 wind turbines (120 m to blade tip height) of the existing wind farm exert an influence across the western and south-western extents of the WLA (as illustrated by Figures 6.2 and 6.18).

Although potential effects on WLA 20 are considered as a whole, the assessment focusses on potential effects in areas of additional visibility of wind turbines introduced by the Development, as highlighted by the ZTV shown on Figure 6.19. This is limited to pockets of visibility in areas which generally cannot be accessed without experiencing views of existing wind farm development whilst travelling across or into the interior of the WLA.

The eastern and north-eastern extents of the WLA, including a small proportion of the western extents of the Cairngorms National Park and the Dulnain Valley to the east of the Strathdearn Hills, will experience no visibility of the Development (as illustrated on Figure 6.17)

4.1.5.3 Routes and movement through the WLA

The draft guidance (SNH, 2017³⁶) notes that key locations and routes within the WLA should be considered. The WLA 20 description³⁷ notes that the WLA has a "wide range of access points and tracks or paths entering the area" which encourage "various types of outdoor recreation, such as shooting fishing, hillwalking, ski-mountaineering, and mountain-biking", mainly focussed around the margins of the WLA.

Access into and across the WLA is possible via a number of estate tracks which generally follow the long, narrow glens which cut into the hills and provide access to the interior plateau.

Whilst the interior of the WLA is relatively remote and not frequently visited, the Munro hill summits of Carn Dearg (945 m Above Ordnance Datum (AOD)), Carn Sgulain (919 m AOD), A' Chailleach (930 m AOD) and Geal Charn (926 m AOD) are popular with recreational receptors. These hills are located along the south-western boundary of the WLA and are typically accessed by hillwalkers and mountain bikers from Glen Banchor to the south, south-east of the WLA, or from Garva Bridge to the south (Geal Charn).

Other popular hill summits accessed by recreational receptors include the Corbett summits of Carn an Fhreiceadain (878 m AOD) and Geal-charn Mor (824 m AOD).

There are no core paths or promoted long-distance routes within the WLA; however, it is noted in the WLA description that the network of estate tracks provide access from the peripheries of the WLA into its interior generally following the long and narrow valleys which dissect the plateau. Estate tracks also provide access on to the elevated plateau and some of the summits from outside the WLA, including the Burma Road to the east which is popular with walkers and mountain bikers accessing this route from within the

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³⁶ SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

³⁷ SNH (2017), Description of Wild Land Areas – Monadhliath Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Monadhliath-July-2016-20.pdf (Accessed 06/10/2020)

Cairngorms National Park. However, the upland interior of WLA is largely devoid of access tracks crossing the highest ground.

The Glen Markie track, the Old Road to Coignafearn and the Glen Banchor Cart Track are promoted as part of the Heritage Paths project³⁸ and cross the WLA. Relatively short sections of the Glen Markie track and the Glen Banchor Cart Track are located within the southern extents of the WLA. The Old Road to Coignafearn crosses the central extents of the WLA and passes from the south-eastern boundary to the north-western boundary.

4.1.5.4 Wild Land Qualities likely to be affected

The Development is located entirely outside WLA 20, and the wild land impact assessment is therefore limited to identifying where there is potential for indirect effects on the defined wild land qualities.

The description of WLA 20: Monadhliath sets out the key wild land qualities, and relevant physical attributes and perceptual responses, which are defined in Table A6.4.2.

Fieldwork undertaken during June and July 2020 confirmed that each of the four wild land qualities are expressed, to a varying degree, within close proximity to the Site, and within a radius of approximately 15 km. The Annex to this assessment contains photographs taken during fieldwork, and where relevant reference is made to the specific wild land quality, physical attribute and/or perceptual response which they illustrate.

Each wild land quality in turn is considered in respect of the potential for it to be affected by the Development; however, the potential for these to be significantly affected by the Development will vary.

The Study Area for the detailed assessment of effects on the wild land qualities of WLA 20, informed by the ZTV (shown on Figure 6.17) will focus on a radius of approximately 15 km from the proposed wind turbines, extending from the south-western extent of the WLA at Geal Charn, Càrn an Fhreiceadain to the east, and the elevated plateau to the north-east extending south-east from Strathdearn, Although large extents of the WLA will experience no visibility of the Development, where relevant consideration is given to how particular wild land qualities will remain unaffected by wind farm development.

Table A6.4.2: WLA 20 Wild Land Qualities

| Wild Land Quality (from WLA description) | Relevant physical attributes and perceptual responses (from WLA description) | Expressed within the Study Area and potential for effects |
|---|---|---|
| Wild Land Quality 1 "A range of massive rounded hills and plateaux that are aweinspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges" | Awe-inspiring Arresting Sense of remoteness Physically challenging | The wild land quality is expressed across the western periphery of the WLA and within the vicinity of the Development. Potential for wild land quality to be indirectly affected by the Development, in areas of the WLA where views to the distant mountains of the Central Highlands to the west are possible. Effects on wild land quality considered in detailed assessment |
| Wild Land Quality 2 "An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' | Awe-inspiring Arresting Sense of risk | The wild land quality is expressed across much of the WLA, including the western extents in close proximity to the Site. The introduction of additional wind turbines, alongside existing wind farm developments, |

³⁸ http://www.heritagepaths.co.uk/

| Wild Land Quality (from WLA description) | Relevant physical attributes and perceptual responses (from WLA description) | Expressed within the Study Area and potential for effects |
|--|---|---|
| and a strong sense of naturalness, remoteness and sanctuary" | Sense of remoteness Sense of naturalness Lack of human artefacts or evidence of contemporary land use Sense of sanctuary | in close proximity to the WLA has the potential to indirectly effect this wild land quality. Effects on wild land quality considered in detailed assessment |
| Wild Land Quality 3 "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" | Rugged Sense of sanctuary Sense of solitude Physically challenging Sense of risk | The wild land quality is expressed in close proximity to the Site, although it is most evident in the eastern and central extents of the WLA, where Munro hill summits are accessed from outside the WLA. The Development has the potential to influence this wild land quality, including in areas of the WLA currently unaffected by wind farm development. Effects on wild land quality considered in detailed assessment |
| Wild Land Quality 4 "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" | Sense of sanctuary Sense of remoteness | The wild land quality is expressed in close proximity to the Development in Glen Markie to the south, south-west and the upper reaches of narrow glens which host tributaries of the River Findhorn, including the River Eskin and Abhain Cro Chlach to the south-east. The Development may introduce limited additional visibility and influence of wind farm development in areas of the WLA where this quality is strongly expressed. Effects on wild land quality considered in detailed assessment |

4.1.5.5 Wild land Assessment Points

To support the assessment of effects on each wild land quality, wild land assessment points were identified within the Study Area from which particular wild land qualities, and their physical attributes and/or perceptual responses are expressed. The ZTV informed the selection of the seven wild land assessment points which were shared and agreed with NatureScot³⁹ and are detailed in Table A6.4.3 below.

The assessment points represent locations from where views will be experienced by recreational receptors at popular walking routes and hill summits within WLA 20, in addition to lesser-accessed areas within WLA 20 where the Development will result in additional visibility of wind farm development.

A number of these wild land assessment points are also considered as representative viewpoints in the LVIA contained in Chapter 6 of the EIA Report and/or the Assessment

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 $^{^{39}}$ Wild land assessment points and accompanying visualisations agreed with NatureScot via email: 26 August 2020

of Effects on Special Landscape Qualities (AESLQs) – Cairngorms National Park contained in Appendix A6.3 of the EIA Report. However, unlike the representative viewpoints considered within the LVIA, views from these assessment points are not assessed within the wild land impact assessment, rather they are used as a means of understanding and illustrating the effects upon each of the wild land qualities.

The findings of the LVIA have been referred to in preparing this assessment of effects on Wild Land Areas and used to inform it. Whilst assessed levels of landscape and visual effects inform the assessment, they are not directly transferable or comparable to the levels of effect on WLAs identified here, as the criteria for each assessment are different.

Accompany visualisations (presented in EIA Report Volume 2c) have been produced, in order to illustrate potential visibility of the Development in isolation and in conjunction with other operational, consented and proposed wind farm developments.

Table A6.4.3: Assessment Point Locations

| Table A6.4.3: Assessment Point Locations | | | | |
|---|--------------------|--------|-----------------------------------|--|
| Location | OS Grid Referen | | Approx. Distance ⁴⁰ | Reason for selection |
| WLA1: River Eskin Estate Track (Figure 6.40, Inset Image A6.4.9) | 261733 | 810635 | 3.4 km | Represents views experienced by recreational receptors from a pocket of introduced visibility resulting from the Development, located on estate track from which views of existing wind farm development are limited. The Development will introduce wind farm development into views for receptors travelling on this track into WLA20 along Strathearn and the River Findhorn from where the proposed Corriegarth 2 wind turbines will be the first wind turbines experienced (for a very short section of the track) by receptors accessing the interior of the WLA. Representative of Wild Land Quality 4. |
| WLA2: Allt Cam Ban (Figure 6.41) | 258832 | 806617 | 5.6 km | Represents views experienced by recreational receptors from a pocket of introduced visibility within 10 km of the Development, surrounded by areas with existing visibility of wind farm development. Accessing this location within the WLA would involve the receptor experiencing extensive influence of existing (and consented) wind farm developments, and the location represents a number of similar pockets of visibility concentrated in small hollows found across the undulating plateau, rarely in locations likely to be accessed by receptors passing across/through the WLA. Representative of Wild Land Quality 2. |
| WLA3: Càrn Ban (AESLQ01) ⁴¹ (Figure 6.42) | 263167 | 803371 | 10.3 km | Represents views experienced by recreational receptors at the Munro hill summit within WLA 20 and the Monadhliath ridge forming the boundary of the Cairngorms National Park. Representative of Wild Land Qualities 1, 2 and 3. |
| WLA4: Carn Sgulain | 268305 | 805814 | 11.6 km | Represents views experienced by recreational receptors at the Munro hill summit within WLA |

⁴⁰ To nearest turbine within the Development

⁴¹ Assessment point within the Assessment of Effects on Special Landscape Qualities (AESLQs) contained in Appendix A6.3

| Location | OS Grid Reference | | Approx. Distance ⁴⁰ | Reason for selection |
|---|----------------------|--------|-----------------------------------|---|
| (LVIA VP9 and AESLQ05) ⁴² | | | | 20 and from the boundary of the Cairngorms National Park. |
| (Figure 6.29) | | | | Representative of Wild Land Qualities 1, 2 and 3. |
| WLA5: A'Chailleach (AESLQ02) (Figure 6.44, Inset Image A6.4.1) | 268097 | 804195 | 12.5 km | Represents views experienced by recreational receptors from the Munro hill summit within Cairngorms National Park and on the boundary of WLA 20. Representative of Wild Land Qualities 1, 2 and 3. |
| WLA6: Geal Charn (LVIA VP13 and AESLQ04) (Figure 6.33) | 256139 | 798771 | 13.3 km | Represents views experienced by recreational receptors from the Munro hill summit, within WLA 20 and on the boundary of the Cairngorms National Park. Representative of Wild Land Qualities 1, 2 and 3. |
| WLA7: Càrn an Fhreiceadain (AESLQ03) (Figure 6.43) | 272571 | 807152 | 14.5 km | Represents views experienced by recreational receptors from the Corbett hill summit within WLA 20 and on the boundary of the Cairngorms National Park. Representative of Wild Land Qualities 1, 2 and 3. |

4.1.5.6 Potential for Cumulative Effects

No other operational, consented or proposed wind farm developments are located within WLA 20. Allt Duine Wind Farm was previously proposed within the eastern extents of the WLA at the head of the River Dulnain Valley, and was refused by Scottish Ministers in 2015⁴³, in part due to effects on the WLA. Figure 6.8a and 6.8b illustrate the location of other wind farm developments within a 60 km and 40 km radius of the Development respectively. Potential cumulative effects on the landscape and visual amenity of the Study Area are described within the CLVIA contained in Chapter 6 of the EIA Report;; however,, the potential for cumulative effects on the identified wild land qualities of WLA 20 are considered in the assessment below, and informed by the ZTVs included on Figure 6.10 and Figure 6.20.

The Development will be seen in combination with the Operational Corriegarth Wind Farm, as well as the other operational and consented wind farms located in close proximity to the western and north-western periphery of the WLA and which have already resulted in adverse effects on the qualities of the WLA – most notably: the Stronelairg and Dell Wind Farm cluster to the south-west, the Dunmaglass and Aberarder Wind Farm cluster to the north-east, as well as the Farr and Kyllachy Wind Farm cluster to the north.

A6.4.5 STEP 2 - VERIFYING THE WLA BASELINE

Consideration of the baseline of the WLA has been informed by the WLA 20 description and supplemented by observations during fieldwork undertaken in June and July 2020. The assessment is accompanied by annotated photographs (contained in the Annex to

(http://www.energyconsents.scot/ApplicationDetails.aspx?cr=EC00003192)

⁴² Assessment viewpoint within the LVIA contained in Chapter 6: Landscape and Visual Amenity

⁴³ Refusal of Consent for Section 36 Application to the Scottish Ministers to Construct and Operate the Allt Duine Wind Farm near Kincraig - 30 Jul 2015

this assessment) obtained during fieldwork, selected where possible to illustrate the key wild land qualities of the WLA.

A6.4.1.6 Baseline Characteristics

In 2014, identification and mapping of WLAs by NatureScot confirmed the presence and extent of the Monadhliath WLA. The 2017 description of WLA 20⁴⁴ provides context, key attributes and qualities. These have been considered during desk-based review and site survey. This has allowed for recognition of changes which have occurred since production of descriptions and mapping, as well as an understanding of the strength of the attributes and qualities across different areas. The key wild land qualities of WLA 20 are set out in Error! Reference source not found. above.

The relevant landscape character types (LCTs) which cover the area defined as WLA 20: Monadhliath include the Rolling Uplands – Inverness (221) LCT⁴⁵ and Rolling Uplands – Cairngorms (125) LCT⁴⁶. A number of the key characteristics of these LCTs are judged to contribute to the wildness qualities defined within the WLA description:

Rolling Uplands - Inverness (221) LCT

- "A series of large scale, smooth, rounded hills with summits of similar height forming broad, undulating upland plateaux containing occasional steep-sided straths.
- Uninhabited interior, largely inaccessible to vehicles.
- Expansive views from the hill tops and plateaux create a strong sense of openness and exposure.
- Scale and distance difficult to judge.
- Few signs of active management in the interiors, creating a strong perception of remoteness, although this is affected by a number of large wind farm developments."

Rolling Uplands - Cairngorms (125) LCT

- "A series of massive, broad, smooth, rounded summits: over 800 metres to the south, with the overall height tapering northwards to around 600 metres at the Strathdearn Hills.
- Number of relatively isolated glens.
- Sparse, scattered settlement of isolated traditional farmsteads and estate buildings on lower foothills and flat glen floors.
- Perception of relative remoteness."

A6.4.1.7 Condition of the WLA

The 2017 draft guidance states that: "When reviewing the baseline, the strength of attributes and responses and their contribution to the wild land qualities of the area should be confirmed, taking in to account any changes that may have occurred either within or outwith the WLA since the mapping and descriptions were produced." (para 16, page 6).

The WLA 20 description notes that site assessment was carried out May-June 2013, May 2014 and July-August 2015. Although the interior of the WLA is not considered to have significantly altered since the 2017 description was published, a number of changes have

⁴⁴ SNH (2017), Description of Wild Land Areas – Monadhliath Wild Land Area. [Online] Available at: https://www.nature.scot/sites/default/files/2017-11/Consultation-response-Description-of-Wild-Land-Monadhliath-July-2016-20.pdf (Accessed 06/10/2020)

⁴⁵ https://www.nature.scot/sites/default/files/LCA/LCT%20221%20-%20Rolling%20Uplands%20-%20Inverness%20-%20Final%20pdf.pdf

⁴⁶ https://www.nature.scot/sites/default/files/LCA/LCT%20125%20-%20Rolling%20Uplands%20-%20Cairngorms%20-%20Final%20pdf.pdf

occurred around the periphery of the WLA, predominantly linked to the emergence of the operational wind farm developments which now have an influence on the wild land qualities of the WLA.

The introduction of the operational Stronelairg, Corriegarth and Dunmaglass Wind Farms to the south-west, west and north-west of the WLA respectively, have added to the existing influence of Farr Wind Farm (approximately 6 km to the north-west) which was present when the WLA was established in 2014, and introduced three additional clusters of wind farm development to the western edge of the Monadhliath Mountains, east of the Great Glen.

Often seen in views north-west to south-west from across the upland interior and periphery of the WLA 20, these large scale commercial wind farm developments are now a familiar feature in views experienced by receptors across a large proportion of the WLA (as illustrated by Figure 6.19 and Inset Images A6.4.3, A6.4.8).

Other wind farm developments located to the west of the Great Glen, including Bhlaraidh, Beinneun and Millennium Wind Farm, are barely perceptible in most longer-distance views from the WLA; however, these developments often appear beyond the more prominent developments located within closer proximity to the WLA. To the north, the operational developments of Moy and Tom nan Clach Wind Farms appear evident in views from elevated summits and the interior plateau within the northern and north-eastern extents of the WLA.

Observations on the baseline aspects and strength of expression for each of the wild land qualities are set out in Table A6.4.4 below.

A6.4.6 STEP 3 - SENSITIVITY OF THE WLA QUALITIES

The assessment of sensitivity has been informed by the WLA 20 description and fieldwork undertaken in June and July 2020, and as noted in the 2017 guidance: `The assessment of sensitivity should take into account any evidence of past or current use. This does not automatically make them more or less sensitive to development and assessments should consider this on a case by case basis' (para 19, page 6).

The sensitivity of the underlying LCTs which define WLA 20 was judged to be medium (LCT 221) to high (LCT 125) within the LVIA and took account of both the characteristics of the LCT which contribute to wildness and the existing presence and/or influence of wind farm development.

The sensitivity of each wild land quality to the type and scale of development proposed is set out in Table A6.4.4 below.

A6.4.7 STEP 4 - ASSESSMENT OF EFFECTS

The assessment of effects (including judgments of the sensitivity to the type of development proposed, the magnitude of change and the significance of effects) on each of the WLA qualities of WLA 20: Monadhliath arising from the introduction of the Development is presented in Table A6.4.4 below.

Table A6.4.4 Assessment of effects on WLA 20 Monadhliath

Monadhliath WLA 20

Wild Land Quality 1 (from WLA description)

"A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges"

Relevant physical attributes and/or perceptual responses:

- Awe-inspiring
- Arresting
- Sense of remoteness
- Physically challenging

Aspects, Strength of Expression of Wild Land Quality (Baseline) This wild land quality is expressed across the western periphery of the WLA and within the vicinity of the Development. Elsewhere, it is strongly expressed and evident across the majority of the WLA, where the simplicity, openness and immense scale of the gently rolling hills and plateau of similar elevation appears difficult to discern in the absence of human artefacts and features within the WLA (Inset Images A6.4.1, A6.4.2, A6.4.4).

Within the narrow glens and straths which dissect and penetrate the plateau and offer a marked contrast in experience, this quality is rarely evident.

Panoramic views to distant hill ranges to the west, south and east are experienced from elevated areas of the WLA in close proximity to the Site, but are variable based on location and proximity to other operational and consented wind farm developments (Corriegarth, Stronelairg, Dell, Dunmaglass and/or Aberarder) which exert an existing influence.

Although views from the WLA towards the mountains of the Central Highlands to the west of the Great Glen and the Rannoch, Ben Nevis and Mamores range to the south are substantially affected by the presence of these existing wind farm developments in close proximity to the western and southern periphery of the WLA (Inset Image A6.4.3), views eastwards towards the Cairngorm Mountains remain largely unaffected by wind farm development (as illustrated by wild land assessment points 3-7, Figures 6.29, 6.33, 6.42 to 6.44).

Despite the presence of existing wind farm developments, the *awe-inspiring* and *arresting* simplicity, immense scale and openness of the interior plateau is maintained from large proportions of the WLA; however, the *sense of remoteness* has been diminished by the presence of these large man-made structures at the periphery of the WLA.

The *physically challenging* terrain of the WLA is evident beyond the network of estate tracks which rarely penetrate the vast plateau and remains intact and unaffected by the presence of existing wind farm development located outside the WLA.

Sensitivity of Wild Land Quality to the type of Development proposed The susceptibility of this wild land quality to the type and scale of development proposed varies considerably across the WLA, dependent on the proximity and influence of existing wind farm development. In close proximity to the Site the Operational Corriegarth Wind Farm exerts considerable influence on the WLA, reducing the susceptibility, which is reflected in other areas of the WLA in close proximity to the operational Stronelairg and Dunmaglass Wind Farms. In areas currently unaffected by wind farm development the introduction of visibility may influence the simplicity, *sense of remoteness*, and openness of the WLA which are judged to be of high susceptibility.

Overall, sensitivity to the type and scale of development proposed is judged to be medium.

Assessment of Effects on Wild Land Quality (Magnitude of Change) The introduction of the Development will affect a relatively small proportion of the Study Area, from where the wind turbines will predominantly be seen in conjunction with the Operational Corriegarth Wind Farm, extending the horizontal extent of these views affected by wind turbines (as illustrated by wild land assessment points 3 - Figure 6.42, 5 - Figure 6.43, and 7 - Figure 6.44). The Development will appear in long-distance views from the interior

and eastern extents of the WLA towards the Central Highlands to the west of the Great Glen; however, views towards the Cairngorm Mountains will remain unaffected. The simplicity and openness evident within the interior of the WLA will remain largely unchanged by the introduction of the Development alongside the operational wind farms found to the west and south-west of the WLA; however, the sense of remoteness will be slightly diminished from areas in close proximity to the Site where the proposed wind turbines will appear more prominent at the western periphery of the WLA. The magnitude of change will be Iow. Significance of No mitigation beyond the embedded design mitigation considered in the siting

Significance of Residual Effects on Wild Land Quality

No mitigation beyond the embedded design mitigation considered in the siting and design of the Development (as detailed in Chapter 3: Site Selection and Design) is proposed.

Overall, the effect on this wild land quality will be minor and not significant.

Wild Land Quality 2 (from WLA description)

"An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary"

Relevant physical attributes and/or perceptual responses:

- Awe-inspiring
- Arresting
- · Sense of risk
- Ruggedness
- Sense of remoteness
- Sense of naturalness
- Lack of human artefacts or evidence of contemporary land use
- Sense of sanctuary

Aspects, Strength of Expression of Wild Land Quality (Baseline)

The wild land quality is expressed across much of the WLA, including the western extents in close proximity to the Site, from where the *emptiness* and *remoteness* of the interior can be appreciated (Inset Image A6.4.5, A6.4.6, A6.4.14). An *absence of existing human artefacts* is influenced within the western, south-western interior extents of the WLA, by existing and consented wind farm developments (Corriegarth, Stronelairg, Dell, Dunmaglass and/or Aberarder) located outside the WLA. This affects the existing sense of *naturalness* and *remoteness*.

A sense of sanctuary is limited to lower lying hollows and narrow glens located below the elevated plateau (as illustrated by wild land assessment points 1 - 1 Figure 6.40 and 1 - 1 Figure 6.40.

Despite the presence of existing wind farm development at the periphery of the WLA, the Study Area maintains an *arresting and inspiring, sense of awe* and *emptiness* due to an absence of human artefacts evident across its interior (as illustrated by wild land assessment point 3 – Figure 6.42); however, the presence of the same developments and the sanctuary of access infrastructure they offer diminishes the *sense of risk* experienced from areas of the WLA in relatively close proximity.

Sensitivity of Wild Land Quality to the type of Development proposed

The susceptibility of this quality to the introduction of large scale *human artefacts* and *contemporary land uses* is demonstrated by the influence of existing wind farm developments of Stronelairg, Dunmaglass and Corriegarth Wind Farms which appear as prominent features at the south-western and western peripheries of the WLA. These developments reduce the perceived *naturalness* and *remoteness* which will be further eroded within a localised area by the introduction of further similar development and are considered to be of medium susceptibility.

However, the core interior of the WLA which maintains an absence of *human* artefacts or evidence of contemporary land use and retains a sense of

| Monadhliath WLA 20 | | |
|--|--|--|
| | remoteness and naturalness, which is both awe-inspiring and arresting is judged to be of high susceptibility to encroachment by development and views of development located outside the WLA, particularly in areas where a sense of sanctuary can still be experienced. Sensitivity to the type and scale of development proposed is judged to be medium. | |
| Assessment of Effects on Wild Land Quality (Magnitude of Change) | The ZTV shown on Figure 6.17 indicates that the Development will be visible from much of the western and north-western extents of the WLA; however, from the majority of these areas the Development will be seen in conjunction with the existing Corriegarth, Dunmaglass and Stronelairg Wind Farms (as illustrated by Figure 6.19). | |
| | Small pockets of additional visibility of wind turbines will be introduced to areas of the elevated plateau within 5 km of the Site, where the <i>sense of sanctuary</i> and <i>Lack of human artefacts or evidence of contemporary land use</i> will be diminished. However, in order to access these isolated pockets of the WLA (as illustrated by wild land assessment points 1 – Figure 6.40 and 2 – Figure 6.41) which are otherwise unaffected by development, receptors must travel into the WLA via extensive areas where existing wind farm development exerts considerable influence on this wild land quality. | |
| | Across the wider extents of the WLA, the <i>sense of naturalness</i> and <i>remoteness</i> will remain largely unchanged by the introduction of the Development, and views into the interior of the WLA from the west and south-west will be unaffected by the Development. The <i>awe-inspiring</i> and <i>arresting</i> nature of the simple interior of the WLA will remain intact, with large areas of the WLA remaining a sense of <i>emptiness</i> , and across which the perception of size, scale and distance will remain difficult to discern in the <i>absence of human artefacts</i> or features. | |
| | The physical attribute of <i>ruggedness</i> experienced across parts of the interior of the WLA will remain unaffected by the Development. | |
| | The sense of risk experienced in areas devoid of human artefacts will be slightly diminished in the western extents of the Study Area by the introduction of the Development and its associated access infrastructure in relatively close proximity to the WLA. | |
| | Overall, the magnitude of change will be low. | |
| Significance of Residual Effects on Wild Land Quality | No additional mitigation beyond the embedded design mitigation considered in the siting and design of the Development (as detailed in Chapter 3) is proposed. | |
| | Overall, the effect on this wild land quality will be minor and not significant. | |
| Wild Land Quality 3 (from WLA description) | | |
| "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" | | |
| Relevant physical attributes and/or perceptual responses: | | |
| Rugged Song of constraint | | |
| Sense of sanctuarySense of solitude | | |
| | | |

Aspects, Strength of Expression of Wild Land Quality (Baseline)

Sense of risk

Physically challenging

The wild land quality is expressed in close proximity to the Site, although it is most evident in the eastern and central extents of the WLA, where Munro hill summits are accessed from outside the WLA (as illustrated by wild land assessment points 3 – Figure 6.42, 4 – Figure 6.29, 5 – Figure 6.43 and 7 – Figure 6.44 and Inset Image A6.4.7). The eastern periphery of the WLA represents the key focus of hill walking interest due to the presence of multiple

Monadhliath WLA 20

Munro summits which form the Monadhliath ridge and offer a substantial physical challenge and sense of risk.

The presence of existing and consented wind farm developments (Corriegarth, Stronelairg, Dell, Dunmaglass and/or Aberarder) reduces the sense of risk, experienced by receptors travelling across the rounded hill summits and plateau of the western, south-western extents of the WLA, where these developments exert considerable influence (Inset Image A6.4.8). Despite the presence of these developments around the periphery of the WLA, a sense of risk remains for receptors accessing the remotest rugged areas of its interior.

Physically challenging terrain is evident across much of the WLA, and particularly beyond the network of estate tracks which rarely penetrate the vast plateau and hill summits. This physical attribute remains intact and unaffected by the presence of existing wind farm development located outside the WLA, and is most evident beyond the "main recreation foci and tracks, there is an extensive interior area which is visited by few people and in which there is little activity." A sense of sanctuary and solitude therefore remains within these pockets of the WLA interior (as illustrated by wild land assessment points 1 - Figure 6.40 and 2 - Figure 6.41 and Inset Image A6.4.13) however, these are difficult for receptors to access without experiencing the existing influence of wind farm development on route.

Sensitivity of Wild Land Quality to the type of Development proposed

Around the periphery of the WLA, the influence of existing wind farm development (Corriegarth, Stronelairg and Dunmaglass) has affected the sense of sanctuary and solitude and led to adverse effects on this wild land quality for receptors accessing and recreating in these areas. Within the interior of the WLA however, the *sense of challenge* and *risk* remains intact but is susceptible to further attrition of these perceptual responses from the introduction of further development evident in relatively close proximity.

Opportunities remain to access the interior of the WLA via the steep sided and narrow valleys which penetrate the hill range without experiencing the influence of existing wind farm development. A sense of sanctuary and solitude is retained as receptors travel through the increasingly rugged terrain found within the interior and is judged to be of high susceptibility.

Overall, sensitivity to the type and scale of development proposed is judged to be medium.

Assessment of Effects on Wild Land Quality (Magnitude of Change)

New additional visibility of wind turbines across the WLA will be limited to areas generally located away from the main recreation foci of estate access tracks and frequented hill summits. These pockets of visibility are found across a small proportion of the elevated plateau in close proximity to the Site (as shown on Figure 6.19, and illustrated by wild land assessment point 2 – Figure 6.41), where an existing sense of sanctuary and solitude can be experienced by receptors. This will result in a small scale change to this wild land quality experienced in these very small and isolated areas, as it is noted that to access these remote pockets of additional visibility receptors must travel into the WLA via routes extensively and adversely influenced by existing wind farm developments.

The physically challenging nature of the rugged terrain will remain intact and unaffected by the Development however, the sense of risk will be slightly diminished in areas closest to the Site by the perceived sanctuary and potential escape offered by the access infrastructure of the Development.

Visibility of additional wind turbines in distant views across the WLA will not substantially diminish the existing experience of this wild land quality for receptors accessing the Munro summits along the Monadhliath ridge, from where a degree of separation between the Development and these hills will be

Below the elevated plateau and hill summits of the WLA from where open views are possible to the periphery of the WLA, recreational foci within the steep sided narrow valleys will remain largely unaffected by wind farm

| Monadhliath WLA 20 | | |
|---|---|--|
| | development (as shown on Figure 6.19, and illustrated by wild land assessment point $1 - \text{Figure } 6.40$). | |
| | Overall, the magnitude of change will be low. | |
| Significance of Residual Effects on Wild Land Quality | No additional mitigation beyond the embedded design mitigation considered in the siting and design of the Development (as detailed in Chapter 3) is proposed. | |
| | Overall, the effect on this wild land quality will be minor and not significant. | |

Wild Land Quality 4 (from WLA description)

"Long, narrow glens cutting into the hill and plateau edges which are remote, but facilitate access" Relevant physical attributes and/or perceptual responses:

- Sense of sanctuary
- Sense of remoteness

Aspects, Strength of Expression of Wild Land Quality (Baseline) Many of the narrow and steep sided glens within the interior of the WLA, and where this wild land quality is most evident, retain a *sense of remoteness* and *sense of sanctuary*, where there remains a complete absence of influence from existing wind farm development (as illustrated by Figure 6.19 and Inset Images A6.4.12 and A6.4.13), although other small scale, localised human artefacts and contemporary land uses are evident (Inset Image A6.4.11).

The steep slopes of these deep glens limit views across the plateau and hill summits above, where the other qualities of the WLA are more evident.

The wild land quality is expressed in close proximity to the Development in Glen Markie to the south, south-west and the upper reaches of narrow glens which host tributaries of the River Findhorn, including the River Eskin (Inset Image A6.4.10) and Abhain Cro Chlach to the south-east. The narrow, steep sided valley occupied by the River Eskin is located approximately 4 km to the east of the Site and provides access into Glen Markie through the south-western extents of the WLA. This glen remains largely devoid of influence from wind farm development until its upper extents, where the estate track reaches approximately 650 m AOD (illustrated by wild land assessment point 1, and Inset Image A6.4.9) and from where short lived views of wind turbine blades of the Operational Corriegarth Wind Farm are possible.

Sensitivity of Wild Land Quality to the type of Development proposed The absence of influence from existing wind farm developments means the narrow, steep-sided glens and valleys which penetrate deep into the interior of the plateau maintain a *sense of remoteness* and *sense of sanctuary*. The presence of other human artefacts and contemporary land uses within the glens and straths reduce their susceptibility to similar scale development; however, the sensitivity of this wild land quality to the type and scale of development proposed is judged to be high.

Assessment of Effects on Wild Land Quality (Magnitude of Change) The introduction of the Development will be largely undiscernible from the deep, steep sided glens found within the interior of the WLA (as indicated by the ZTV shown on Figure 6.17).

The one exception to this will be the small area of additional introduced visibility of wind turbines within the small narrow valley occupied by the River Eskin, located approximately 4 km to the east of the Site. The Development will introduce very limited visibility of wind turbine blades to a section of this valley (illustrated by wild land assessment point 1, Figure 6.40), followed by an estate track which provides a physically challenging but accessible route southwest into Glen Markie. The introduction of this visibility of large scale manmade features will reduce the *sense of remoteness* and *sense of sanctuary* evident within this area of the Study Area, and represent the first evidence of wind farm development for receptors travelling into the interior of the WLA via Strathdearn from the north-east. However, for receptors travelling along this route through the WLA, subsequent visibility of the Operational Corriegarth wind turbines, and the more extensive influence from Stronelairg Wind Farm, is present as receptors descend into Glen Markie.

| Monadhliath WLA 20 | | |
|---|---|--|
| | Within this very confined area of the Study Area in close proximity to the Site the magnitude of change will be low. | |
| | However, the majority of the long, narrow glens which penetrate the interior of the WLA will be unaffected by the Development and the magnitude will be negligible. | |
| Significance of Residual Effects on Wild Land Quality | No additional mitigation beyond the embedded design mitigation considered in the siting and design of the Development (as detailed in Chapter 3) is proposed. | |
| | For the western periphery of the Study Area within close proximity to the Site, the effect on this wild land quality will be minor and not significant. | |
| | For the wider extents of the WLA, the effect on this wild land quality will be negligible and not significant. | |

A6.4.8 STEP 5 - JUDGEMENT OF THE SIGNIFICANCE OF EFFECTS

A6.4.1.8 Summary

Four wild land qualities are included in the description of the WLA 20: Monadhliath, and the wild land impact assessment considers the potential for effects on each of these qualities, as set out in

Table A6.4.4 above. The assessment concludes that no significant adverse effects will occur for these four qualities.

The effects identified above are generally considered to be more discernible within the western and north-western extents of the WLA, within which the assessment is focused (within approximately 10 km of the proposed wind turbines).

Additional effects on the wild land qualities are judged to be very localised in their extent, as illustrated by Figure 6.19 and overall, the WLA will not be significantly adversely affected by the addition of the Development in the vicinity of the Operational Corriegarth Wind Farm.

The wind turbines of the Development will increase the horizontal extent of views west from the WLA affected by wind farm development; however, a substantial degree of separation will remain between the cluster of the operational Corriegarth Wind Farm and the Development, and the nearby wind farms of Dunmaglass to the north-east and Stronelairg to the south-west. The Development will therefore not increase any potential perception of encirclement of the WLA by wind energy development.

Although it is acknowledged that some of the wild land qualities, which have been adversely affected by the introduction of existing wind farm development to the southwest, west and north-west of the WLA, will be further eroded in areas within close proximity to the Development, these will not be lost in their entirety across the WLA and most will remain strongly expressed in areas within 10 km of the Site.

Large areas of the WLA will remain unaffected by the influence of wind farm development. Most notably the north-eastern extents of the WLA beyond the Strathdearn Hills will remain unaffected, whilst areas both within and in close proximity to the boundary of the Cairngorms National Park, including the south-eastern slopes of the Monadhliath ridge and the upper reaches of the Dulnain River and its tributaries, distances beyond approximately 10 km from the Site, will be unaffected by the Development (as indicated by Figure A6.17) and remain uninfluenced by wind farm development (as indicated by Figure A6.20).

When considered in the cumulative context of other consented wind farm developments (as shown on Figure 6.20), the presence of the consented Aberarder and Dell Wind Farms will further consolidate the existing pattern of operational wind farms located around the western and southern peripheries of the WLA. These wind farms will appear as extensions to the existing Dunmaglass and Stronelairg Wind Farms respectively in views experienced from across a relatively large proportion of the WLA. They will both respectively increase the number of wind turbines, and horizontal spread of development in views from the WLA but will not appear as separate developments.

The presence of the consented Dell Wind Farm will reduce the distance between the Corriegarth and Corriegarth 2 Wind Farm cluster and the Stronelairg Wind Farm cluster slightly; however, these clusters will retain a c.6 km separation and will appear as discretely separate developments in views experienced from across the WLA. In the case of all other consented and proposed developments, their introduction will consolidate the pattern of existing development in close proximity to the WLA, but will not reduce the distance or degree of separation between the Corriegarth and Corriegarth 2 Wind Farm cluster and the Dunmaglass and Stronelairg Wind Farm clusters to the north-east and south-west respectively.

The addition of other proposed wind farm developments which are currently subject to valid planning applications or at appeal/PLI, including the Glenshero and Cloiche Wind Farms located to the south and east of the operational Stronelairg Wind Farm, will be somewhat discernible in views south, south-west from the WLA, with the increased number and density of wind turbines forming a large consolidated cluster of development in conjunction with the consented Dell Wind Farm. The developments will not however

extend northwards towards the Corriegarth Wind Farm cluster, and therefore the same degree of separation between these two clusters will remain unchanged.

In the presence of these consented and proposed wind farms, the Development will extend the influence of wind farm development on the WLA; however, this will be limited to very small isolated areas of the WLA in relatively close proximity to the Site (within approximately 5 km as indicated by Figure 6.20).

Significant adverse cumulative effects on the wild land qualities WLA are not considered likely to occur, due mainly nature of the Development which will appear as a discrete extension to the Operational Corriegarth Wind Farm, and the very limited extent of additional visibility, and thus influence, which the Development will exert on areas of the WLA currently unaffected by wind farm development.

No additional mitigation beyond the embedded design mitigation considered in the siting and design of the Development (as detailed in Chapter 3) is proposed in order to avoid or reduce the effects identified in this assessment.

A6.4.1.9 Conclusions

WLAs are recognised as a nationally important asset in NPF3 and SPP. SPP recognises the sensitivity of WLAs and that development located outside WLA also requires consideration of any effects on wild land (SPP paragraph 169); however, it is clear that "Buffer zones should not be established around areas designated for their natural heritage importance." (para 196).

Whilst the 2017 draft guidance⁴⁷ states that "*The protection of wild land qualities, as set out in SPP, means that only in exceptional circumstances relating to scale, siting or design will development outwith WLAs have a significant effect"*(para 25), significant effects on wild land qualities can occur particularly in relation to large scale wind farm development located within close proximity to WLAs.

In this instance, the Development consolidates the existing influence of wind farm development on the WLA by way of an extension to the existing Corriegarth Wind Farm, and has been sited and designed (as set out in Chapter 3) in order to minimise as far as possible, the opportunity for additional adverse effects on the WLA 20: Monadhliath. Significant effects on the qualities of WLA 20 are judged to have been overcome through sensitive siting and design of the Development.

In conclusion, the adverse effects on the wild land qualities identified within the assessment are judged not to undermine the objectives for its protection, and the overall integrity of the WLA will not be compromised by the introduction of the Development.

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⁴⁷ SNH (2017), Assessing impacts on Wild Land Areas – technical guidance draft. [Online] Available at: https://www.nature.scot/consultation-draft-guidance-assessing-impacts-wild-land-areas-technical-guidance (Accessed 06/10/2020)

ANNEX - Fieldwork photographs: Wild Land Impact Assessment



Inset Image A6.4.1: View across interior of WLA 20 from Assessment Point 5: A'Chailleach, representative of Wild Land Quality 1: "A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges" (Approx. NGR: 268123, 804175)



Inset Image A6.4.2: View from north of Assessment Point 5: A'Chailleach, looking south-west towards Ben Alder and the Ben Nevis Range beyond. Representative of Wild Land Quality 1: "A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges" (Approx. NGR: 267921, 805125)



Inset I mage A6.4.3: View west across interior of WLA 20 from north of Wild Land Assessment Point 3: Càrn Ban, towards the Central Highlands with existing wind farm development evident west of the WLA. Representative of Wild Land Quality 1: "A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges" (Approx. NGR: 263135, 803313)



Inset Image A6.4.4: View south-east towards Cairngorm Mountains from Munro Hill summit of Carn Dearg (945 m AOD) to the south of Wild Land Assessment Point 3: Càrn Ban. Representative of Wild Land Quality 1: "A range of massive rounded hills and plateaux that are awe-inspiring in their simplicity, openness and immense scale, and offer panoramic views to distant mountain ranges" and Wild Land Quality 3: "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" (Approx. NGR: 263551, 802398)



Inset Image A6.4.5: Interior of WLA 20 looking west along Allt Cuil na Caillich to the south of Assessment Point 4: Carn Sgulain. Representative of Wild Land Quality 2: "An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary" (Approx. NGR: 267980, 804912)



Inset Image A6.4.6: Peat hags and rough vegetation on approach to Assessment Point 4: Carn Sgulain, demonstrating the ruggedness and sense of remoteness evident across the interior of WLA 20. Representative of Wild Land Quality 2: "An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary" (Approx. NGR: 267979, 805202)



Inset I mage A6.4.7: Approach to Assessment Point 6: Geal Charn a popular Munro hill summit on the southwestern edge of WLA 20. Representative of Wild Land Quality 3: "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" (Approx. NGR: 253452, 796013)



Inset I mage A6.4.8: Approach to Assessment Point 6: Geal Charn on the south-western edge of WLA 20, from where evidence of human artefacts and contemporary land use (in this instance Stronelairg Wind Farm) exert considerable influence on the Wild Land Quality 3: "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" (Approx. NGR: 255797, 798527)



Inset Image A6.4.9: View west from Wild Land Assessment Point 1: River Eskin Estate Track towards the enclosing landform east of the Site. Representative of Wild Land Quality 4: "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" (Approx. NGR: 261733, 810635)



Inset I mage A6.4.10: Views east along the narrow valley of the River Eskin from east of Wild Land Assessment Point 1 towards the interior of WLA 20. Representative of Wild Land Quality 4: "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" (Approx. NGR: 263108, 810906)



Inset I mage A6.4.11: Estate access track descending into Strathdearn from the northern edge of WLA 20, with small scale evidence of human artefacts and contemporary land use. Representative of Wild Land Quality 4: "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" (Approx. NGR: 264807, 813069)



Inset I mage A6.4.12: Estate access track alongside the River Findhorn in Strathdearn within the interior of the WLA, and devoid of any influence of existing wind farm development. Representative of Wild Land Quality 4: "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" (Approx. NGR: 265489, 812936)



Inset Image A6.4.13: Estate access track providing access into WLA 20 from Glen Banchor within the Cairngorms National Park to the popular Munro hill summits found along the Monadhliath ridge. Representative of Wild Land Quality 3: "A hill range in which many types of recreation take place, but its large, remote interior maintains a sense of sanctuary, challenge and risk" and Wild Land Quality 4: "Long, narrow glens cutting into the hill and plateau edges which are remote but facilitate access" (Approx. NGR: 267102, 800985)



Inset Image A6.4.14: Views west towards Site from interior of WLA 20, represented by Assessment Point 2: Allt Cam Ban, and devoid of any influence of existing wind farm development. Representative of Wild Land Quality 2: "An extensive, simple interior with few human artefacts, contributing to a perceived 'emptiness' and a strong sense of naturalness, remoteness and sanctuary" (Approx. NGR: 258832, 806617)