

Corriegarth 2 Wind Farm
Schedule of EIAR & SEI Consultation
Responses PART 1

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

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

From: [Nina Caudrey](#)
To: [Flaherty D \(Debbie\)](#); [Econsents Admin](#)
Cc: [Planning](#); [Debbie.Skinner@nature.scot](#); [south_highland@nature.scot](#); [Stuart Davidson](#)
Subject: Corriegarth 2 wind farm - CNPA consultation response
Date: 23 April 2021 12:00:48

Hello Debbie (cc others for information)

The CNPA planning committee considered the proposed Corriegarth 2 wind farm this morning, deciding that CNPA **do not object** to the proposed wind farm. We had some technical difficulties with the live streaming of the meeting, but a recording will be made available on the CNPA website in due course, along with the minutes, via <https://cairngorms.co.uk/planning-development/committee-meetings/>.
from
Nina

Nina Caudrey, MRTPI
Planning Officer (Development Planning)

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

From: Debbie.Flaherty@gov.scot [mailto:Debbie.Flaherty@gov.scot]
Sent: 10 February 2021 13:22
To: Nina Caudrey <ninacaudrey@cairngorms.co.uk>
Cc: Planning <Planning@cairngorms.co.uk>; Debbie.Skinner@nature.scot
Subject: RE: Corriegarth 2 Windfarm - Energy Consent's Consultation request

Hi Nina

I am happy to grant an extension to 30 April.

Regards

Debbie Flaherty | Consents Manager | Energy Consents Unit M: 07393 753458 W: 0131 244 1258 0131 244 1258

From: Nina Caudrey <ninacaudrey@cairngorms.co.uk>
Sent: 10 February 2021 12:47
To: Flaherty D (Debbie) <Debbie.Flaherty@gov.scot>
Cc: Planning <Planning@cairngorms.co.uk>; Debbie Skinner <Debbie.Skinner@nature.scot>
Subject: RE: Corriegarth 2 Windfarm - Energy Consent's Consultation request

Hello Debbie (cc Debbie at NatureScot for information)

Thank you for your email consulting CNPA on the above wind farm proposal. Under the casework agreement between CNPA and NatureScot, NatureScot provide CNPA with advice on the effects of proposals outwith the National Park on the Special Landscape Qualities of the National Park.

At present the NatureScot advice is due to be with CNPA in around mid-March. To fit in with deadlines for preparation of the committee report, I would therefore be looking to take the case to our April committee. Please can I therefore request an extension to the consultation period for CNPA to Friday 30 April 2021?

Many thanks
from
Nina

Nina Caudrey, MRTPI
Planning Officer (Development Planning)

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

From: Debbie.Flaherty@gov.scot [<mailto:Debbie.Flaherty@gov.scot>]
Sent: 20 January 2021 16:28
Subject: Corriegarth 2 Windfarm - Energy Consent's Consultation request

Dear Consultees

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

ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM DEVELOPMENT IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL.

On 8 January 2021, BayWa.r.e on behalf of Corriegarth Windfarm Limited (the Applicant) submitted an application under section 36 of the Electricity Act 2017 ('the Act') for the Scottish Ministers' consent to construct and operate Corriegarth 2 windfarm development, located on Corriegarth Estate, 15 KM north east of Fort Augustus and 10km south east of Foyers in the Highlands. The proposed development consists **16 turbines – 149.9m to tip height and associated infrastructure.**

In accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA regulations') and regulations made under Schedule 8(1) to the Act, a notice detailing the application will be published by the Applicant in the local and national press and the Edinburgh Gazette shortly.

In accordance with the EIA Regulations a consultation in respect of the application must be carried out. You can review the EIA Report and associated documents online from our Energy Consent website which can be found at the following link:

www.energyconsents.scot – search – simple search – Corriegarth 2 (ECU Reference ECU00002175)

The application documentation is also available to view at [Corriegarth 2 Windfarm – BayWa.r.e. \(baywa-re.co.uk\)](http://Corriegarth 2 Windfarm – BayWa.r.e. (baywa-re.co.uk))

The closing date for any representations you may wish to make in this case is 3 March 2021. Please note reminder letters are not routinely issued by the Energy Consents Unit therefore if we have not received your comments, or any extension request we will assume that you have no comments to make.

You can submit your response by e-mail to Econsents_admin@gov.scot or direct to my email address below.

If you have any queries regarding this email please do not hesitate to contact me.

Yours faithfully

Debbie Flaherty | Consents Manager | Energy Consents Unit
The Scottish Government, 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU
M: 07393 753458 W: 0131 244 1258 | debbie.flaherty@gov.scot
To view our current casework please visit www.energyconsents.scot

The information contained within this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this message, delete any copies held on your systems and notify the sender immediately. If you have received this email in error, you should not retain, copy or use it for any purpose, nor disclose all or any part of its content to any other person. All messages passing through this gateway are checked for viruses but we strongly recommend that you check for viruses using your own virus scanner as Cairngorms National Park Authority will not take responsibility for any damage caused as a result of virus infection.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

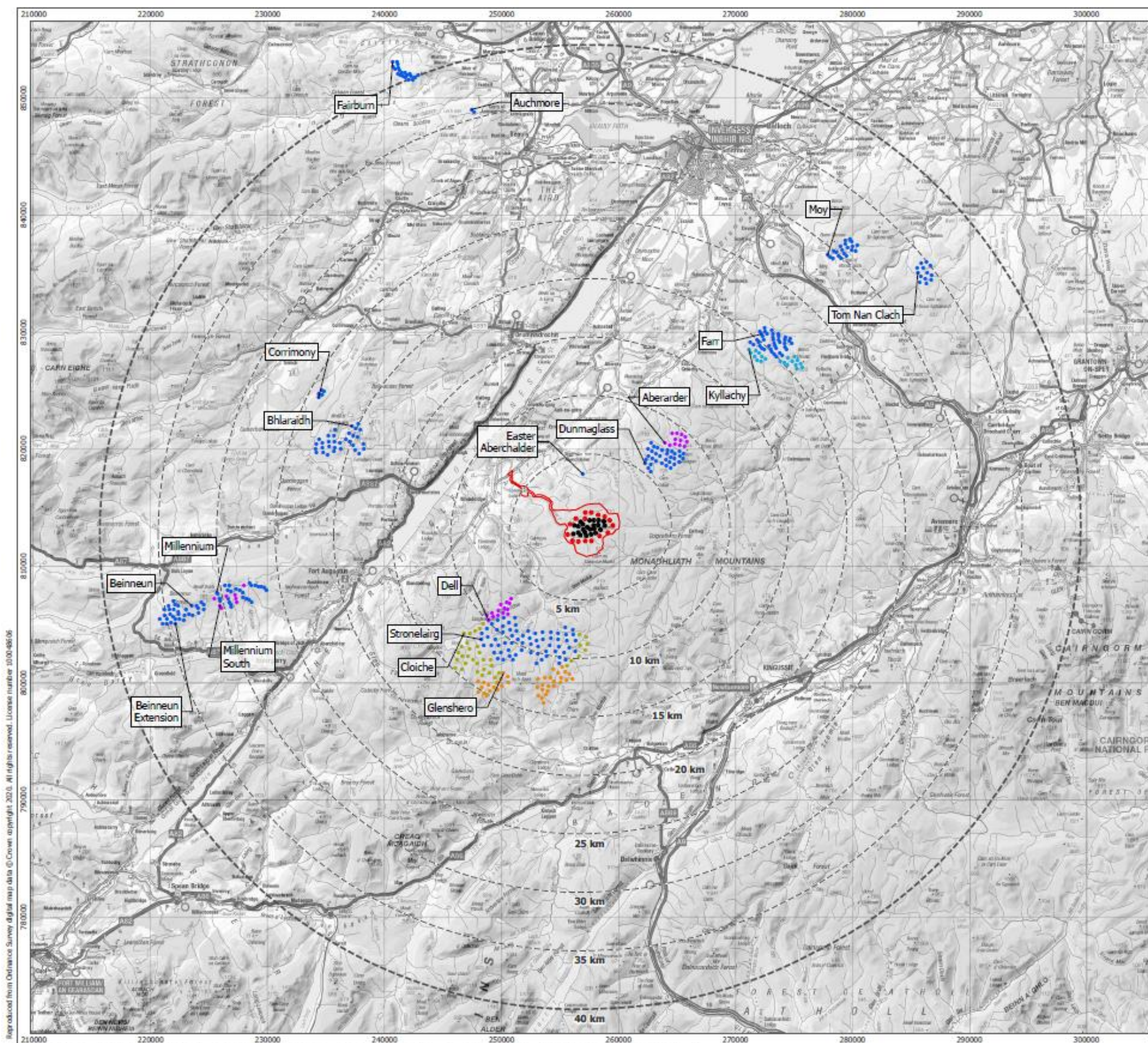
This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return.

Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

The information contained within this e-mail and in any attachments is confidential and may be privileged. If you are not the intended recipient, please destroy this message, delete any copies held on your systems and notify the sender immediately. If you have received this email in error, you should not retain, copy or use it for any purpose, nor disclose all or any part of its content to any other person. All messages passing through this gateway are checked for viruses but we strongly recommend that you check for viruses using your own virus scanner as Cairngorms National Park Authority will not take responsibility for any damage caused as a result of virus infection.

CAIRNGORMS NATIONAL PARK AUTHORITY

DEVELOPMENT PROPOSED: Corriegarth 2 wind farm	
Consultation from Scottish Government Energy Consents & Deployment Unit	
REFERENCE:	2021/0050/PAC (ECU00002175)
APPLICANT:	Corriegarth 2 Wind farm Ltd
DATE CONSULTED:	10 February 2021
RECOMMENDATION:	No objection
CASE OFFICER:	Nina Caudrey, Planning Officer



Reproduced from Ordnance Survey digital map data © Crown copyright 2020. All rights reserved. License number 1030-88506
T:\1071\10792_Corriegarth\WFE\Ext\VA\GIS\PROJ\Corriegarth2_LVIA_EIA_202008\LU_Corriegarth2_LVIA_EIA_A3\LU_Corriegarth2_LVIA_EIA_A3Lapn\FIG6-8b_10792_r1_LVIA_CML_WF_40km_A3L



- Development boundary
- Existing Corriegarth turbine location
- Corriegarth 2 turbine location
- 5 km intervals from outermost turbines
- 40 km from outermost turbines
- Wind farms (by status)**
- Operational
- Under Construction
- Consented
- Application Submitted
- Appeal/Public Inquiry
- Design/Scoping

1:315,000 Scale @ A3
0 5 10 km

Produced By: JN	Ref: 10792-6.8b
Checked By: DW	Date: 11/09/2020

**Other Wind Farm
Developments - 40km**
Figure 6.8b

**Corriegarth 2 Wind Farm
EIA Report**

PURPOSE OF REPORT

1. The purpose of this report is to inform the committee decision and subsequent consultation response to the Scottish Government Energy Consents & Deployment Unit (ECDU) on an application submitted under Section 36 of the Electricity Act 1989 for a proposed wind farm located to the south west of the Cairngorms National Park. The Scottish Government are the determining Authority for this application as the output is more than 50 MW. The application is accompanied by an Environmental Report (ER), which presents the findings of the applicant's Environmental Impact Assessment (EIA).
2. The planning issues to be considered are confined to the effects of the proposed wind farm on the landscape character and Special Landscape Qualities (SLQs) of the National Park. All other matters, such as ecology, noise, general amenity, etc, are assessed by the decision maker (Scottish Ministers) with advice from statutory consultees.
3. Under the current working agreement on roles in landscape casework between NatureScot and the Park Authority, NatureScot lead on the provision of advice on the effects on the SLQs caused by proposals outwith the Cairngorms National Park. Their advice has been used to inform this report.

SITE DESCRIPTION AND PROPOSED DEVELOPMENT

4. The proposed wind farm will encircle the existing Corriegarth wind farm in the Monadhliaths, approximately 15 kilometres (km) north-east of Fort Augustus and 10 km south-east of Foyers by Loch Ness, as shown in the applicant's ER figure 8.6b on page 2 of this report. The existing Corriegarth wind farm has 26 turbines at a blade tip height of 120m. As also shown in the figure, in the surrounding area there are numerous other existing and consented wind farms, plus several proposed wind farms in the planning system.
5. The proposed development would comprise 16 turbines with a maximum height of 149.9m to the tip of the blade in an upright position, approximately 13km of upgraded existing track plus 10km of new track, as well as other infrastructure and works (such as substation, underground cabling, borrow pits, etc). It is expected that the proposed wind farm would have an estimated total installed capacity of around 76.8MW, dependent on the turbine specification used.
6. The nearest turbine would be approximately 10 km to the north of the closest part of the boundary of the Cairngorms National Park, with the other turbines, tracks and associated infrastructure located further from the National Park boundary.
7. Theoretical visibility of the proposed wind farm from within the National Park is shown by the applicant's ER figure 6.3a (**Appendix I**). However, when considering the cumulative visual effects, figure 6.10b of the applicant's ER (**Appendix II**) demonstrates that the area is already influenced by a number of other existing and consented wind farm. The proposed wind farm does not create visibility of a wind farm in areas that do not or would not already see existing wind farms.

8. Visualisations from three viewpoints, VP9 Carn Sgulain and VPI3 Geal Charn (both in the Monadhliaths near the boundary of the National Park) and VPI9 Ptarmigan restaurant (Cairngorm mountain), have been provided in the applicant's ER to demonstrate the level of visibility that would be had from within/on the boundary of the National Park, at distances of approximately 12, 13 and 42 km respectively to the nearest proposed turbine. In addition, visualisations were produced to support the wild land assessment, including three viewpoints looking from within the National Park towards the proposed wind farm, which are also of use when considering the effects on the SLQs of the National Park: VP 6.42 (Carn Ban), 6.43 (Càrn an Fhreiceadain) and 6.44 (A'Chailleach).
9. The visualisations associated with each view point are available to the public by searching the application documents on the ECDU website <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002175> for:
 - Vol 2d Fig 6.29 Viewpoint 9 Carn Sgulain
 - Vol 2d Fig 6.33 Geal Carn
 - Vol 2d Fig 6.39 Viewpoint 19 Ptarmigan Restaurant, Cairngorm
 - Vol 2c Fig 6.42 WLA3 Carn Ban
 - Vol 2c Fig 6.43 WLA5 Càrn an Fhreiceadain
 - Vol 2c Fig 6.44 WLA7 A'Chailleach

RELEVANT PLANNING HISTORY

10. **PRE/2020/0012** CNPA responded to scoping and gatecheck consultations by ECDU in March and July 2020.

PLANNING POLICY CONTEXT

11. The proposed development is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan policies do not apply. However, an assessment of the proposal must have regard to Scottish Planning Policy (SPP) and the National Park Partnership Plan (NPPP).

National Policy

12. **Scottish Planning Policy** (revised December 2020) sets out national planning policies that reflect Scottish Ministers priorities for the development and use of land, as well as for operation of the planning system. The content of SPP is a material consideration in planning decisions that carries significant weight.
13. Policy relating specifically to National Parks and development management can be found in paragraphs 84 and 85 of SPP. These re-state the four aims of the National Parks as set out in the National Parks (Scotland) Act 2000, as well as the need to pursue these collectively. SPP highlights that if there is a conflict between the first aim (conserving and enhancing the natural and cultural heritage of the area) and any of the others, then

greater weight must be given to the first aim. Planning decisions are expected to reflect this weighting and be consistent with the four aims.

14. Paragraph 85 of SPP also clarifies that the aims and requirements of paragraphs 84 and 85 apply to development outwith a National Park that affects the Park.
15. Paragraph 212 of SPP states that “where development affects a National Park... it should only be permitted where:
 - a) the objectives of the designation and the overall integrity of the area will not be compromised; or
 - b) any significant adverse impacts on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance”.

Strategic Policy

16. The **Cairngorms National Park Partnership Plan (NPPP)** 2017 – 2022 is required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park approved by Scottish Ministers. The NPPP sets out how all those with a responsibility for the National Park will coordinate their work to tackle the most important issues. There is a duty for decision makers to have regard to the NPPP, a requirement set out in Section 14 of the Act. As such, the NPPP is a material consideration in planning decisions.
17. The NPPP identifies that the landscapes of the National Park are valued by many and underpin the area’s economy. It contains policies to safeguard landscape interests. Of relevance to wind farm development proposals are policies 1.3 and 3.3.
18. Policy 1.3 seeks to conserve and enhance the SLQs as a general policy objective for management of the National Park.
19. Policy 3.3a seeks to support development of a low carbon economy and increase renewable energy generation where this is compatible with conserving the SLQs. In relation to wind farm development, the policy states that “large scale wind turbines are not compatible with the landscape character or special qualities of the National Park. They are inappropriate within the National Park, or where outside the Park they significantly adversely affect its landscape character or special landscape qualities”.

CONSULTATIONS

NatureScot advice

20. In accordance with the NatureScot/CNPA casework agreement, NatureScot have provided CNPA with advice in relation to the effects on the National Park, of the proposed wind farm both alone and cumulatively with other existing and consented wind farms in the surrounding area.

21. NatureScot advise that there will be no significant adverse effects on the landscape character of the National Park.
22. In relation to the SLQs, NatureScot advise that there would be a moderate and significant adverse effect on one SLQ, 'vastness of space, scale and height', when experienced from a small number of hill summits on the north western edge of National Park at a distance of 10 – 15km from the proposed wind farm.
23. The area is already influenced by a number of existing and consented wind farms. The proposed wind farm would increase prominence of turbines due to the combination of the greater turbine size and higher elevations that they would be located on (compared to the existing Corriegarth wind farm), as well as adding to visual complexity due to different turbine heights and increased overlapping. There would be a slight extension to the horizontal extent occupied by wind turbines, however it would not significantly change the visual separation between existing wind farm and the proposed wind farm.
24. Overall, the magnitude of change would be medium. The effects on the 'vastness of space, scale and height' SLQ would be moderate, being localised and limited to a small number of hill tops on the boundary of the National Park at a distance of 10 - 15km, in an area already influenced by wind farm development.
25. Follow up discussions with NatureScot confirm that nature and significance of the effects on the affected SLQ are such that the integrity and objectives of the National Park would not be compromised.

APPRAISAL

26. The policies of the NPPP and SPP set out how proposals outwith the boundary of the National Park should be considered in terms of effects on the National Park.
27. Policy 3.3a of the NPPP sets out a test for considering effects on the landscapes of the National Park, in that large scale wind turbines are inappropriate outside the Park where they 'significantly adversely affect its landscape character or special landscape qualities'. If a proposal fails policy 3.3a, it would also be in conflict with policy 1.3, which seeks to conserve and enhance the SLQs.
28. Paragraph 212 of SPP sets out that "development that affects a National Park... should only be permitted where:
 - a) the objectives of designation and the overall integrity of the area will not be compromised; or
 - b) 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."
29. In the policy context of the NPPP and SPP, consideration is required of the effects of the proposed development, on landscape character and the SLQs, both alone and cumulatively with other wind farms in the surrounding area.

30. There are a number of existing and consented wind farms in the area surrounding the proposed wind farm, as shown on page 2 of this report. Adding the proposed Corriegarth 2 wind farm to the baseline would not significantly add to the existing level of effects, either alone or in combination with other existing or consented wind farms.
31. Only one SLQ is moderately affected, with the effects being limited and localised to areas that already have visibility of existing and consented wind farms. The nature and significance of the effects are such that the proposal is therefore considered to comply with National Park Partnership Plan policy 3.3a.
32. Because the proposal is considered to comply with policy 3.3a, and is also considered to comply with policy 1.3.
33. When considering the localised and limited nature and significance of the effects, in an area already affected by other wind farm developments, the proposal is not considered to compromise the integrity or objectives of the National Park. The proposal is therefore also considered to be in accordance with Scottish Planning Policy paragraph 212.
34. For these reasons, it is recommended that CNPA should **not** object to the proposed wind farm development.

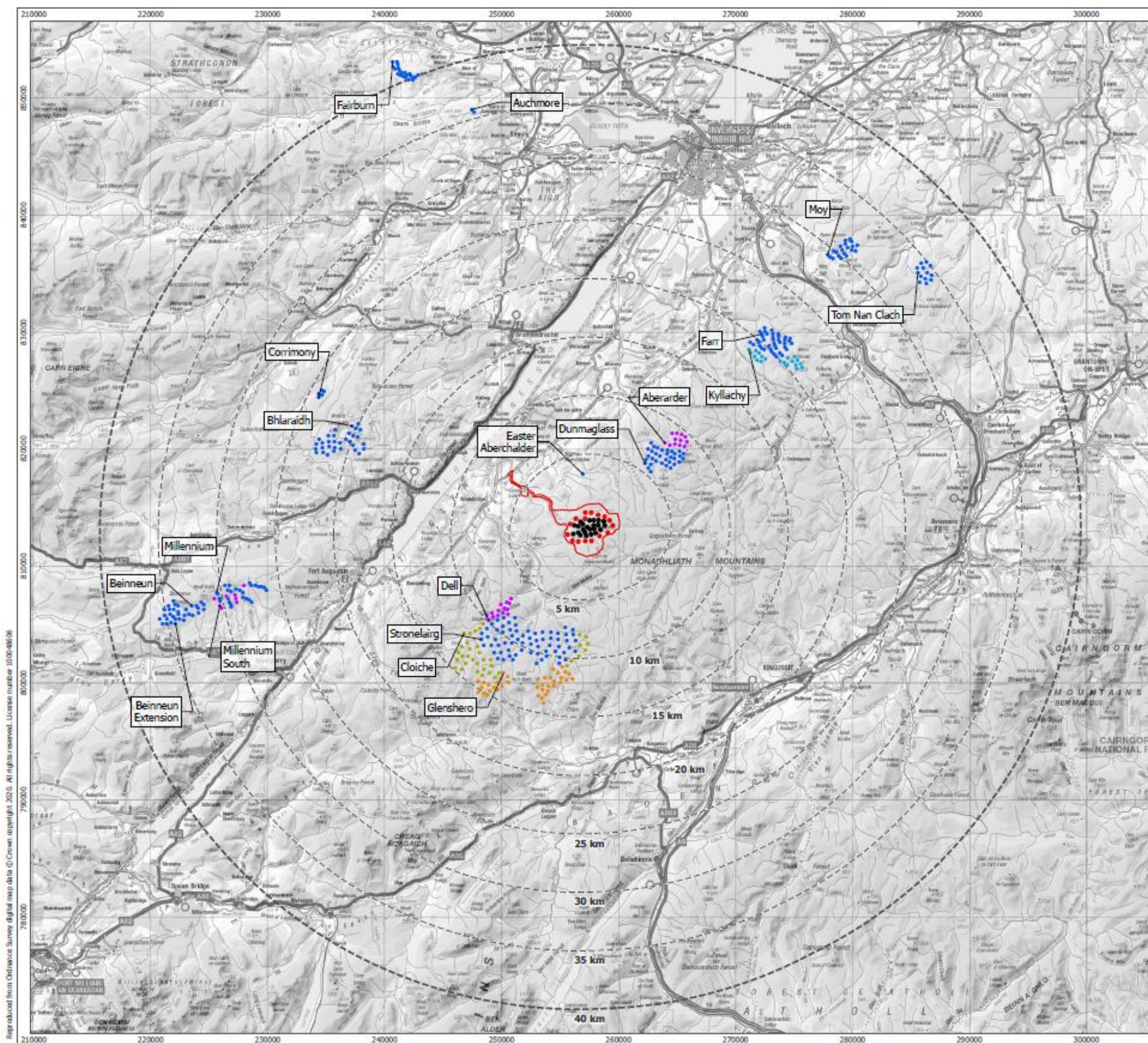
RECOMMENDATION

That Members of the Committee confirm:

- That the CNPA has **NO OBJECTION** to the application for the proposed Corriegarth 2 wind farm.

CAIRNGORMS NATIONAL PARK AUTHORITY

DEVELOPMENT PROPOSED: Corriegarth 2 wind farm	
Consultation from Scottish Government Energy Consents & Deployment Unit	
REFERENCE:	2021/0050/PAC (ECU00002175)
APPLICANT:	Corriegarth 2 Wind farm Ltd
DATE CONSULTED:	10 February 2021
RECOMMENDATION:	No objection
CASE OFFICER:	Nina Caudrey, Planning Officer



Reproduced from Ordnance Survey digital map data © Crown copyright 2020. All rights reserved. License number 1030-88206
T:\107\10792_Corriegarth\WFE\Ext\VA\GIS\PROJ\Corriegarth2_LVIA_EIA_202008\1\UC_Corriegarth2_LVIA_EIA_A3\1\UC_Corriegarth2_LVIA_EIA_A3\1\prn\FIG6-8b_10792_r1_LVIA_CML_WF_40km_A3\



- Development boundary
- Existing Corriegarth turbine location
- Corriegarth 2 turbine location
- 5 km intervals from outermost turbines
- 40 km from outermost turbines
- Wind farms (by status)**
- Operational
- Under Construction
- Consented
- Application Submitted
- Appeal/Public Inquiry
- Design/Scoping

1:315,000 Scale @ A3
0 5 10 km

Produced By: JN	Ref: 10792-6.8b
Checked By: DW	Date: 11/09/2020

**Other Wind Farm
Developments - 40km**
Figure 6.8b

**Corriegarth 2 Wind Farm
EIA Report**

PURPOSE OF REPORT

1. The purpose of this report is to inform the committee decision and subsequent consultation response to the Scottish Government Energy Consents & Deployment Unit (ECDU) on an application submitted under Section 36 of the Electricity Act 1989 for a proposed wind farm located to the south west of the Cairngorms National Park. The Scottish Government are the determining Authority for this application as the output is more than 50 MW. The application is accompanied by an Environmental Report (ER), which presents the findings of the applicant's Environmental Impact Assessment (EIA).
2. The planning issues to be considered are confined to the effects of the proposed wind farm on the landscape character and Special Landscape Qualities (SLQs) of the National Park. All other matters, such as ecology, noise, general amenity, etc, are assessed by the decision maker (Scottish Ministers) with advice from statutory consultees.
3. Under the current working agreement on roles in landscape casework between NatureScot and the Park Authority, NatureScot lead on the provision of advice on the effects on the SLQs caused by proposals outwith the Cairngorms National Park. Their advice has been used to inform this report.

SITE DESCRIPTION AND PROPOSED DEVELOPMENT

4. The proposed wind farm will encircle the existing Corriegarth wind farm in the Monadhliaths, approximately 15 kilometres (km) north-east of Fort Augustus and 10 km south-east of Foyers by Loch Ness, as shown in the applicant's ER figure 8.6b on page 2 of this report. The existing Corriegarth wind farm has 26 turbines at a blade tip height of 120m. As also shown in the figure, in the surrounding area there are numerous other existing and consented wind farms, plus several proposed wind farms in the planning system.
5. The proposed development would comprise 16 turbines with a maximum height of 149.9m to the tip of the blade in an upright position, approximately 13km of upgraded existing track plus 10km of new track, as well as other infrastructure and works (such as substation, underground cabling, borrow pits, etc). It is expected that the proposed wind farm would have an estimated total installed capacity of around 76.8MW, dependent on the turbine specification used.
6. The nearest turbine would be approximately 10 km to the north of the closest part of the boundary of the Cairngorms National Park, with the other turbines, tracks and associated infrastructure located further from the National Park boundary.
7. Theoretical visibility of the proposed wind farm from within the National Park is shown by the applicant's ER figure 6.3a (**Appendix I**). However, when considering the cumulative visual effects, figure 6.10b of the applicant's ER (**Appendix II**) demonstrates that the area is already influenced by a number of other existing and consented wind farm. The proposed wind farm does not create visibility of a wind farm in areas that do not or would not already see existing wind farms.

8. Visualisations from three viewpoints, VP9 Carn Sgulain and VPI3 Geal Charn (both in the Monadhliaths near the boundary of the National Park) and VPI9 Ptarmigan restaurant (Cairngorm mountain), have been provided in the applicant's ER to demonstrate the level of visibility that would be had from within/on the boundary of the National Park, at distances of approximately 12, 13 and 42 km respectively to the nearest proposed turbine. In addition, visualisations were produced to support the wild land assessment, including three viewpoints looking from within the National Park towards the proposed wind farm, which are also of use when considering the effects on the SLQs of the National Park: VP 6.42 (Carn Ban), 6.43 (Càrn an Fhreiceadain) and 6.44 (A'Chailleach).
9. The visualisations associated with each view point are available to the public by searching the application documents on the ECDU website <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002175> for:
 - Vol 2d Fig 6.29 Viewpoint 9 Carn Sgulain
 - Vol 2d Fig 6.33 Geal Carn
 - Vol 2d Fig 6.39 Viewpoint 19 Ptarmigan Restaurant, Cairngorm
 - Vol 2c Fig 6.42 WLA3 Carn Ban
 - Vol 2c Fig 6.43 WLA5 Càrn an Fhreiceadain
 - Vol 2c Fig 6.44 WLA7 A'Chailleach

RELEVANT PLANNING HISTORY

10. **PRE/2020/0012** CNPA responded to scoping and gatecheck consultations by ECDU in March and July 2020.

PLANNING POLICY CONTEXT

11. The proposed development is located wholly outwith the National Park, therefore the Cairngorms National Park Local Development Plan policies do not apply. However, an assessment of the proposal must have regard to Scottish Planning Policy (SPP) and the National Park Partnership Plan (NPPP).

National Policy

12. **Scottish Planning Policy** (revised December 2020) sets out national planning policies that reflect Scottish Ministers priorities for the development and use of land, as well as for operation of the planning system. The content of SPP is a material consideration in planning decisions that carries significant weight.
13. Policy relating specifically to National Parks and development management can be found in paragraphs 84 and 85 of SPP. These re-state the four aims of the National Parks as set out in the National Parks (Scotland) Act 2000, as well as the need to pursue these collectively. SPP highlights that if there is a conflict between the first aim (conserving and enhancing the natural and cultural heritage of the area) and any of the others, then

greater weight must be given to the first aim. Planning decisions are expected to reflect this weighting and be consistent with the four aims.

14. Paragraph 85 of SPP also clarifies that the aims and requirements of paragraphs 84 and 85 apply to development outwith a National Park that affects the Park.
15. Paragraph 212 of SPP states that “where development affects a National Park... it should only be permitted where:
 - a) the objectives of the designation and the overall integrity of the area will not be compromised; or
 - b) any significant adverse impacts on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance”.

Strategic Policy

16. The **Cairngorms National Park Partnership Plan (NPPP)** 2017 – 2022 is required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park approved by Scottish Ministers. The NPPP sets out how all those with a responsibility for the National Park will coordinate their work to tackle the most important issues. There is a duty for decision makers to have regard to the NPPP, a requirement set out in Section 14 of the Act. As such, the NPPP is a material consideration in planning decisions.
17. The NPPP identifies that the landscapes of the National Park are valued by many and underpin the area’s economy. It contains policies to safeguard landscape interests. Of relevance to wind farm development proposals are policies 1.3 and 3.3.
18. Policy 1.3 seeks to conserve and enhance the SLQs as a general policy objective for management of the National Park.
19. Policy 3.3a seeks to support development of a low carbon economy and increase renewable energy generation where this is compatible with conserving the SLQs. In relation to wind farm development, the policy states that “large scale wind turbines are not compatible with the landscape character or special qualities of the National Park. They are inappropriate within the National Park, or where outside the Park they significantly adversely affect its landscape character or special landscape qualities”.

CONSULTATIONS

NatureScot advice

20. In accordance with the NatureScot/CNPA casework agreement, NatureScot have provided CNPA with advice in relation to the effects on the National Park, of the proposed wind farm both alone and cumulatively with other existing and consented wind farms in the surrounding area.

21. NatureScot advise that there will be no significant adverse effects on the landscape character of the National Park.
22. In relation to the SLQs, NatureScot advise that there would be a moderate and significant adverse effect on one SLQ, 'vastness of space, scale and height', when experienced from a small number of hill summits on the north western edge of National Park at a distance of 10 – 15km from the proposed wind farm.
23. The area is already influenced by a number of existing and consented wind farms. The proposed wind farm would increase prominence of turbines due to the combination of the greater turbine size and higher elevations that they would be located on (compared to the existing Corriegarth wind farm), as well as adding to visual complexity due to different turbine heights and increased overlapping. There would be a slight extension to the horizontal extent occupied by wind turbines, however it would not significantly change the visual separation between existing wind farm and the proposed wind farm.
24. Overall, the magnitude of change would be medium. The effects on the 'vastness of space, scale and height' SLQ would be moderate, being localised and limited to a small number of hill tops on the boundary of the National Park at a distance of 10 - 15km, in an area already influenced by wind farm development.
25. Follow up discussions with NatureScot confirm that nature and significance of the effects on the affected SLQ are such that the integrity and objectives of the National Park would not be compromised.

APPRAISAL

26. The policies of the NPPP and SPP set out how proposals outwith the boundary of the National Park should be considered in terms of effects on the National Park.
27. Policy 3.3a of the NPPP sets out a test for considering effects on the landscapes of the National Park, in that large scale wind turbines are inappropriate outside the Park where they 'significantly adversely affect its landscape character or special landscape qualities'. If a proposal fails policy 3.3a, it would also be in conflict with policy 1.3, which seeks to conserve and enhance the SLQs.
28. Paragraph 212 of SPP sets out that "development that affects a National Park... should only be permitted where:
 - a) the objectives of designation and the overall integrity of the area will not be compromised; or
 - b) 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."
29. In the policy context of the NPPP and SPP, consideration is required of the effects of the proposed development, on landscape character and the SLQs, both alone and cumulatively with other wind farms in the surrounding area.

30. There are a number of existing and consented wind farms in the area surrounding the proposed wind farm, as shown on page 2 of this report. Adding the proposed Corriegarth 2 wind farm to the baseline would not significantly add to the existing level of effects, either alone or in combination with other existing or consented wind farms.
31. Only one SLQ is moderately affected, with the effects being limited and localised to areas that already have visibility of existing and consented wind farms. The nature and significance of the effects are such that the proposal is therefore considered to comply with National Park Partnership Plan policy 3.3a.
32. Because the proposal is considered to comply with policy 3.3a, and is also considered to comply with policy 1.3.
33. When considering the localised and limited nature and significance of the effects, in an area already affected by other wind farm developments, the proposal is not considered to compromise the integrity or objectives of the National Park. The proposal is therefore also considered to be in accordance with Scottish Planning Policy paragraph 212.
34. For these reasons, it is recommended that CNPA should **not** object to the proposed wind farm development.

RECOMMENDATION

That Members of the Committee confirm:

- That the CNPA has **NO OBJECTION** to the application for the proposed Corriegarth 2 wind farm.

Melrose J (Joyce)

From: Joan McGrogan <joan.mcgrogan@crownestatescotland.com>
Sent: 02 February 2021 15:58
To: Flaherty D (Debbie)
Cc: Econsents Admin
Subject: 20210202 - Corriegarth 2 Windfarm - Energy Consent's Consultation request
Deadline: 3 March 2021 - CES interests not affected

Dear Debbie

Thank you for your email.

I write to confirm that the assets of Crown Estate Scotland are not affected by this proposal and we therefore have no comments to make.

Best regards

Joan.
Joan McGrogan
Portfolio Co-ordinator
Crown Estate Scotland

t: 0131 376 1569 / 07391 407753

Our team are currently working from home. Mail is occasionally being collected from our offices (addresses are at www.crownestatescotland.com/contact-us). Where possible, please email or call us rather than post mail.

! CAUTION ! This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.



Defence Infrastructure Organisation

Teena Oulaghan
Safeguarding Manager
Defence Infrastructure Organisation
Safeguarding Department
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Your Reference: **ECU00002175**

Tel: 07970 170 934

Our Reference: **DIO18604**

Email: Teena.oulaghan100@mod.gov.uk

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

22nd February 2021

By email only

Dear Debbie,

Application reference: **ECU00002175**
Site Name: **Corriegarth 2 Wind Farm**
Proposal: **THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017. ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM DEVELOPMENT IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL.**
Site address: **North East of Fort Augustus, Inverness.**

Thank you for consulting the Ministry of Defence (MOD) in relation to the Section 36 application through your communication dated 20th January 2021.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to tell you that, **subject to the conditions detailed in Appendix A**, the MOD has no objection to the proposed development.

The application concerns a development of 16 turbines with maximum blade tip heights of 149.90 metres above ground level. The development has been assessed using the location data (Grid References) below as provided by EIA report Chapter 4 Development Description.

Turbine no.	Easting	Northing
1	255650	812676
2	256065	812153
3	256563	812077

4	257157	812139
5	257690	812131
6	258376	812555
7	259091	812839
8	259524	813455
9	259249	813893
10	258820	814213
11	258262	814348
12	257669	814560
13	257161	814559
14	257136	814013
15	256358	814038
16	255875	813556

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.

Physical Obstruction

In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

As a minimum the MOD would require that the cardinal turbines are fitted with Combi lighting emitting both 25cd visible and infra-red (IR) light, the remainder of the perimeter turbines are marked by either 25cd visible or IR lights.

Summary

Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of any alterations or other submissions relating to this proposal in order that amendments can be checked for any additional impact on defence interests. Even the slightest change to the form and layout of the scheme may have significant impacts.

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,

REDACTED

Teena Oulaghan
Safeguarding Manager

Appendix A

Condition - Aviation Lighting

Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Scottish Government in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

- a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
- b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason for condition.

To maintain aviation safety.

Condition - Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of wind turbine generators;
- b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
- c) the date any wind turbine generators are brought into use;
- d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.

To maintain aviation safety.



Defence Infrastructure Organisation

Teena Oulaghan
Safeguarding Manager
Defence Infrastructure Organisation
Safeguarding Department
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Your Reference: **ECU00002175**

Tel: 07970 170 934

Our Reference: **DIO18604**

Email: Teena.oulaghan100@mod.gov.uk

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

19th April 2021

By email only

Dear Debbie,

Application reference: **ECU00002175**
Site Name: **Corriegarth 2 Wind Farm**
Proposal: **THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017. ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM DEVELOPMENT IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL.**
Site address: **North East of Fort Augustus, Inverness.**

I write further to my response letter of 22nd February 2021, to update the safeguarding position of the Ministry of Defence (MOD) in relation to the above Section 36 application to construct and operate the Corriegarth 2 Wind Farm consisting of 16 wind turbines up to 149.9 metres in height to blade tip.

The principal safeguarding concern of the MOD in relation to this development concerns the potential for the wind turbines to cause an obstruction hazard to military aircraft engaged in low flying training activities in this area.

The application site occupies Low Flying Area 14 (LFA14) which, when activated, can be used by military fixed wing aircraft, including fast jets, are permitted to fly down to 250 feet (76.2 metres) above terrain features. to conduct low-level flight training.

To address this impact, given the location and scale of the development, the MOD recommends that cardinal turbines are fitted with MOD accredited combination 25 candela omni-directional red lighting and infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration to be attached at the highest practicable point. The remaining perimeter turbines should be fitted with 25 candela or infrared lighting of the same specification. This would provide

the optimal safety address making the windfarm conspicuous to military aircrew engaged in low flying training in the area particularly in low visibility conditions during daylight hours.

However, the MOD is aware that lighting the wind farm as recommended above may be problematic for the applicant so, having further reviewed this development proposal, I can confirm that to suitably address military low flying safety considerations the turbines of the proposed wind farm should at minimum be fitted with MOD accredited 25 candela omni-directional red lighting or equivalent infrared beacons with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration to be attached at the highest practicable point.

Therefore, I can confirm that the MOD maintains no safeguarding objection to this application subject to the inclusion of the following conditions in any consent that may be granted:

Summary

Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of any alterations or other submissions relating to this proposal in order that amendments can be checked for any additional impact on defence interests. Even the slightest change to the form and layout of the scheme may have significant impacts.

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,



Teena Oulaghan
Safeguarding Manager

Appendix A

Condition - Aviation Lighting

Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Scottish Government in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

- a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
- b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason for condition.

To maintain aviation safety.

Condition - Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of wind turbine generators;
- b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
- c) the date any wind turbine generators are brought into use;
- d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.

To maintain aviation safety.

Melrose J (Joyce)

From: Safeguarding <Safeguarding@hial.co.uk>
Sent: 01 March 2021 14:56
To: Flaherty D (Debbie); Econsents Admin
Subject: RE: Corriegarth 2 Windfarm - Energy Consent's Consultation request

Your Ref: ECU00002175
HIAL Ref: 2021/0030/INV

Dear Sir/Madam,

PROPOSAL: ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED CORRIEGARTH 2 WINDFARM DEVELOPMENT

LOCATION: 15 KM north east of Fort Augustus and 10km south east of Foyers

This development impacts the safeguarding criteria for Inverness Airport.

No wind turbine forming part of the Development shall operate, other than for testing and evaluation as agreed with the operator of Inverness Airport, unless and until a Radar Mitigation Scheme has been submitted to and approved in writing by the local planning authority, after consultation with the operator of Inverness Airport and the Civil Aviation Authority. No wind turbine(s) forming part of the Development shall be operational until and unless all measures required by the approved Radar Mitigation Scheme have been fully implemented. The Development shall thereafter be operated fully in accordance with the approved Radar Mitigation Scheme.

In this condition "Radar Mitigation Scheme" means a scheme setting out measures to address and mitigate the impact of the wind turbines forming part of the development upon the operation and performance of the Primary Surveillance Radar at Inverness Airport. The scheme will include the appropriate measures to be implemented and that are to be in place for the operational life of the development provided the Radar remains in operation. It will also include provision for future and alternate agreement of the mitigation solution with the operator of Inverness Airport.

Reason: To secure mitigation of impacts and ensure the development does not affect the safe operation of Inverness Airport through interference with the Primary Surveillance Radar.

Provided that this condition is met, Highlands and Islands Airports would not object to the proposal.

Regards,

Safeguarding Team
Highlands and Islands Airports Limited
Head Office, Inverness Airport, Inverness IV2 7JB
✉ safeguarding@hial.co.uk 🌐 www.hial.co.uk

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: debbie.flaherty@gov.scot;
Econsents_Admin@gov.scot

Debbie Flaherty
Case Officer, Energy Consents Unit
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: ECU00002175
01 March 2021

Dear Debbie Flaherty

The Electricity Act 1989 Section 36
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Corriegarth 2 Windfarm development, located on Corriegarth Estate, 15 KM north east of
Fort Augustus and 10km south east of Foyers
EIA Report

Thank you for your consultation which we received on 20 January 2021. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations and for our historic environment remit. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

You should also seek advice from the Highland Council's archaeology and conservation advisors for matters including unscheduled archaeology and category B and C-listed buildings.

The Proposed Development

We understand that the proposed development consists of 16 wind turbines (max height 149.9m) and associated infrastructure. The proposed wind turbines are to be located adjacent to the operational Corriegarth Wind Farm, within the Corriegarth Estate, approximately 15 km north-east of Fort Augustus and 10 km south-east of Foyers.

Our Position

We are content that sufficient information has been provided in the EIA report to come to a view on the proposal.

We note that EIA report concludes that there will be no significant impacts for heritage assets within our remit as a result of the proposal. We agree with this conclusion and do not wish to object to the proposed development.



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

Our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further Information

This response applies to the application currently proposed. An amended scheme may require another consultation with us.

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.englished.org.

Please contact us if you have any questions about this response. The officer managing this case is Urszula Szupczynska who can be contacted by phone on 0131 668 8653 or by email on Urszula.Szupczynska@hes.scot.

Yours sincerely

Historic Environment Scotland

PEAT LANDSLIDE HAZARD RISK ASSESSMENT

CORRIEGARTH 2 WIND FARM

STAGE 1 CHECKING REPORT



Scottish Government
Riaghaltas na h-Alba
gov.scot

ENERGY CONSENTS UNIT

IronsideFarrar
Environmental Consultants

50782 | 21.04.21

Contents

1.0	INTRODUCTION	1
1.1	Context to Report	1
1.2	Audit Methodology	1
1.3	Documents Reviews	1
2.0	REVIEW OF DATA SUPPORTING PLHRA	2
2.1	Background to The Proposed Development	2
2.2	Is a PLHRA Necessary?	2
2.3	Team Competencies and Spatial Scope of Study	2
2.4	Structure of PLHRA Reporting	2
2.5	Review of Desk Study	2
2.6	Review of Field Surveys	3
2.7	Integration of Desk Study and Field Surveys	4
3.0	REVIEW OF HAZARD & RISK ASSESSMENT AND PROPOSED MITIGATION	5
3.1	Assessment of Likelihood	5
3.2	Assessment of Consequence	5
3.3	Calculation of Risk	6
3.4	Proposed Mitigation	6
4.0	SUMMARY AND RECOMMENDATIONS	8
4.1	Summary of Developers PLHRA	8
4.2	Summary Outcome of Checking Report	9
4.3	Recommendations	9

History/ Stage

This document has been prepared to audit Peat Landslide and Hazard Risk Assessments on behalf of the Scottish Government Energy Consents Units.

The Stage of the Checking Point and history of the document is as follows:

Stage	Date	Description	Author	Checked/ Approved
1	21.04.21	Stage 1 Checking Report	Blair Kilpatrick BSc, MSc, FGS, Project Geologist	Mark Chapman, BSc, MSc, CEng, MICE, Director

1.0 INTRODUCTION

1.1 Context to Report

The Scottish Government Energy Consents Unit is responsible for processing applications under sections 36 and 37 of the Electricity Act 1989 to develop electricity generation projects and overhead electric lines. In addition, under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, Scottish Ministers are required to consider the environmental impacts of the proposal. EIA Development applications are therefore required to be supported by EIA Reports, which include site-specific information and survey details in respect of the risk of peat landslide events for elements of the proposal and its infrastructure (i.e., construction of roads, access, tracks, wind turbine foundations etc).

The Energy Consents Unit commissioned Ironside Farrar Ltd to technically assess the Peat Landslide Hazard and Risk Assessment(s) (PLHRAs) submitted by developers. This checking report will consider whether or not adequate and appropriate field survey, peat sampling and analytical methods have been employed to provide a sound basis for assessing peat stability and the risk from peat landslides within the development envelope. The checking report will provide a summary of findings and recommendations and the Energy Consents Unit will issue a copy to the developer in accordance with the requirements of the Best Practice Guide (Scottish Government, 2017).

1.2 Audit Methodology

This audit primarily reviews the information submitted by the developer against the guidance provided in:

- Peat Landslide Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments, Energy Consents Unit Scottish Government, Second Edition, April 2017.

1.3 Documents Reviews

The documents reviewed as part of this audit were:

Stage 1 Audit:

- Corriegarth 2 Wind Farm, EIAR Volume 3, Technical Appendix 13.1, Peat Landslide Risk Assessment, ARCUS, September 2020.
- Corriegarth 2 Wind Farm, EIAR Volume 3, Technical Appendix 13.2, Outline Peat Management Plan, ARCUS, September 2020.
- Corriegarth 2 Wind Farm, EIAR Volume 1, Chapter 13 Geology and Peat, ARCUS, September 2020.

2.0 REVIEW OF DATA SUPPORTING PLHRA

2.1 Background to The Proposed Development

The Site 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). The Site incorporates the boundaries of the operational Corriegarth Wind Farm in its entirety. The proposed development includes:

- Up to 16 three-bladed turbines with a maximum tip height of 149.9 m and rotor diameters of up to 133 m including external transformers (if required).
- Associated foundations, blade laydown areas and crane hardstandings at each wind turbine location.
- Access tracks linking the turbine locations.
- Substation compound incorporating electrical switchgear and wind farm control elements.
- Temporary construction compound.
- Underground cabling running adjacent to the access tracks where possible.
- Up to two onsite borrow pits.

2.2 Is a PLHRA Necessary?

The initial assessment of baseline data available for the site confirms the need for a PLHRA. Parts of the site are shown to comprise peat (BGS data) and Class 1 (Nationally Important) peat (Carbon & Peatland Map 2016). This means that there is potential for peat to be present at >0.5m depth, and the site has slopes in excess of 2 degrees. Site characteristics therefore meet the criteria contained within the ECUBPG for when a PLHRA is required.

2.3 Team Competencies and Spatial Scope of Study

Details of the team undertaking the assessment are not provided in the report. Competencies, qualifications and experience of the team should be included in the PLHRA reporting in order to establish the robustness of the assessment.

2.4 Structure of PLHRA Reporting

The PLHRA forms a part of a wider for Corriegarth 2 Wind Farm however the document can be treated as a stand-alone. Significant quantities of background data on geology, site layout etc is summarised from other EIAR chapters within the document and provided a robust backbone to the assessment.

2.5 Review of Desk Study

Generally, the desk study provides a robust and relatively concise backbone to the assessment and is considered suitable for purpose. However, information is lacking in some areas that should be including in the reporting.

Topographical information is discussed in section 2.1. The information is presented well, and an image of the site and its topography is easily grasped from this. The location of the site / site description is appreciated, especially the grid reference for the site as mapping

produced does not provide much insight into the exact location of the windfarm due to its remoteness. A site layout plan is included as Figure 13.1.1.

Section 2.2 discusses the existing physical nature of the site including geology, geomorphology, hydrology and hydrogeology. These sections are considered robust and provide the essential information for the site while remaining easily digestible, more detailed information on each of these subjects can be found within the wider EIAR but for the purposes of this assessment it is not considered necessary.

Geological mapping (superficial and bedrock) is included within the reporting as figures 13.1.2 and 13.1.3 respectively. They show the site resides within a metamorphic regime with the superficial deposits described as peatland across the majority of the site. Carbon and Peatland (2016) Scotland mapping has not been considered for the site and this should be included within reporting.

Section 3 of the reporting provides background to the guidance and information on preparatory and triggering factors as well as information typical peat slide conditions etc. Generally, this section of the reporting is robust and provides a good background to the reporting.

While the desk study is generally considered consistent with a level required to satisfy the guidance some potential sources of information have potentially been overlooked. These sources include but are not limited to; local knowledge from landowners / land managers, historical mapping, newspaper articles etc. A key piece of desk study information for this site would be an issues identified during construction/operational phases of the existing windfarm. Please provide comment on whether these resources have been considered and update the desk study to reflect their findings where necessary.

2.6 Review of Field Surveys

Generally probing for the site has been completed to a standard that is considered acceptable to satisfy the guidance. No mention of a site walkover is provided in the reporting however due to the location of the windfarm within the existing footprint of Corriegarth Wind Farm it is expected the areas has been well explored prior to the design of this windfarm.

Probing on the site has been carried out across two phases, an initial site wide survey supplemented by information for the existing Corriegarth Wind Farm and a secondary detailed survey as per the guidance. Information regarding the density of probing on the site is given in section 3.3 of the reporting document.

Probing consisted of a 100m centred initial site wide survey, followed by a infrastructure specific probing consisting of a 10m grid over the proposed turbine footprints and 50m centres with 25m offsets along the tracks. Probing is not fully in line (some gaps in probing are present along sections of track and on the periphery of the development) with the guidance (2017 SNH SEPA Developments of Peatland) it provides a suitably robust coverage and is considered acceptable.

Where probing does fall short of the guidance is in regard to ancillary infrastructure. Probing of borrow pits, construction compounds, substations etc should have been undertaken in detail during the investigation. Probing for the track section between T8 and T9 appears not to be directly on the track itself but offset to the south. Please provide details of the probing beneath such infrastructure or justification for the lack of probing in such areas.

Where peat is present generally its depth exceeds 1m, the deepest peat on the site was located in the south east, 5.3m deep. A total of 3,380 probes were sunk. Of these, 13.4% recorded no peat or peat less than 0.5 m.

Phase two of the investigation also included the extraction of peat cores from across the site for laboratory analysis, and Von Post classification. This is detailed within section 4.4 of the report.

An analysis of substrate material was also undertaken during the probing survey via probe feel. This methodology is considered acceptable and the results of the survey feed into the assessment of peat slide likelihood and therefore risk on the site.

2.7 Integration of Desk Study and Field Surveys

Several figures have been produced to supplement the information provided in the PLHRA report. These include interpolated peat depth (interpolation method is unknown), slope maps constructed using a 5m DTM, and a geomorphological map. These figures provide a suitably robust link between desk study information and the conditions encountered on the site during the walkovers and physical investigation.

Geomorphological mapping for the site is provided as Figure 13.1.4 and includes features such as peatland erosion (areas of minor and intense haggling), water courses and breaks in slope. The areas of possible historic slide reported in 2.2.3 south of T3, T4 and T5 are not shown. Evidence of historical slide activity should be highlighted in the geomorphological mapping for the site. No receptors other than wind farm infrastructure and watercourse are identified on aerial photography or OS mapping. The site is not forested. The geomorphological mapping for the site is considered robust.

A slope model constructed from a 5m DTM has been provided as figure 13.1.7, and peat depth across the site is shown in figure 13.1.6. Both of these maps are considered suitable for the purposes of the PLHRA.

3.0 REVIEW OF HAZARD & RISK ASSESSMENT AND PROPOSED MITIGATION

3.1 Assessment of Likelihood

The assessment is considered to be in line with the ECUBPG. A factor-based system with appropriate weighting has been used to calculate likelihood across the site. Clarification is sought as to selection of the factors for assessing the likelihood of a peat slide.

Section 4.7 of the PLHRA lists six contributory factors that would typically be considered: peat depth, slope angle, historical instability, substrate material, vegetation cover and hydrology. Please provide some clarification as to why only 3 factors from the identified six were carried forward to the assessment.

Slope analysis is undertaken using data from the 5m DTM. The approach to scoring looks at slope in an isolated system (does not take into account peat growth on slopes) whereby increasing likelihood comes with increasing slope, this methodology is considered acceptable. Slope is scored from 1-8 with slopes of 0-<2 degrees receiving a score of 1, slopes of 2-<4 degrees receiving a score of 2, slopes of 4-<8 degrees receiving a score of 4, slopes of 8-<15 degrees receiving a score of 6 and slope of greater than 15 degrees receiving a score of 8 (Table 3 of the PLHRA).

Scoring of Peat depth is provided in table 4 of the PLHRA reporting and is considered appropriate. Peat depth is scored between 1 and 8 with scores increasing with increasing depth of peat. This approach is considered typical and acceptable under the ECUBPG.

Scoring of substrate generally follows information laid out in the ECUBPG regarding slip surfaces / materials below the peat and scores assigned to the various substrate conditions are considered acceptable, although clarity is required as to what a 'slip material' is and how that differs from a clay. If this is material that has already slipped then why has this not been included in the calculations for the areas to the south of T3, T4 and T5. Given that slips are mentioned in the text.

A factor of safety assessment is also carried out for the site, the assessment has used effective cohesion, friction angles, and unit weights from literature sources and these appear to be within normal limits for peatland. The assessment is broadly similar to that described in the ECUBPG and therefore considered credible. A figure showing the factor of safety outcomes for the site is provided as Figure: 13.1.8.

No likelihood mapping is provided for the site. In future reporting it might be beneficial to have mapping displaying peat slide likelihood across the site.

3.2 Assessment of Consequence

Similarly, to the likelihood assessment a factor based approach has been used to define consequence across the site. Three factors have been selected for the calculation, these are receptor type, distance from the receptor and relative elevation compared to the receptor. These three factors are considered appropriate for the assessment of consequence / exposure.

Receptors on the site are identified as existing windfarm infrastructure and watercourses. Following a review of aerial photography / satellite imagery for the site this is considered acceptable.

The scoring for receptor type is consistent with the scoring pattern in the likelihood assessment with factors being scored between 2 and a maximum score of 8. The maximum

score of 8 is given to: Residential Properties/Community, Watercourses/Lochs, important habitat. The scoring for this factor is considered acceptable.

Distance from receptor and relative elevation from receptor are both scored 1-4, with increasing relative elevation and reducing distance from the receptor receiving the highest scores. Scoring for both of the factors appears to be rational and therefore acceptable under the ECUBPG.

3.3 Calculation of Risk

Risk was calculated for the site by normalising the likelihood and consequence scores and then multiplying the normalised scores to produce a maximum score of 25, this was divided into 4 categories from negligible risk (scores of 1-4) to high risk (scores of 17-25). This methodology is considered acceptable.

Table 11 describes the appropriate levels of mitigation / actions suggested for the calculated risk across the site. This table is similar to that in the ECUBPG and therefore provides a suitable platform from which the assessment and associated mitigation can be concluded.

Risk across the site is shown in figure 13.1.9. The majority of the wider site is described in Section 6.1 as being of low risk with areas of moderate risk across the most southern track and at T1, T2, T3, T4, T5 and T6 and locally north of T7. It appears that the description of risk in Section 6.1 is slightly misleading as the site area includes the existing WF. Of the new infrastructure, 7 of 16 turbines/associated tracks are in moderate (medium) risk areas including T16, which is not mentioned in the description. No areas of high risk are identified on the site. Figure 13.1.9 splits the site into 10 zones that are carried forward into the mitigation section of the reporting.

It is noted within table 9 of the PLHRA document that areas of medium risk will require specific mitigation or avoidance in order that construction may proceed. Due to the scale of the medium risk locations (identified as sections 2, 7, 8 and 9 on figure 13.1.9) in proximity to large portions of the proposed infrastructure it is unlikely that micro-siting will be appropriate and therefore detailed mitigation for the above medium risk areas will be required.

3.4 Proposed Mitigation

Mitigation provided for the site is considered relatively generic and not targeted to specific problems identified in the risk assessment particularly turbines located in medium risk areas. No site wide best practice / mitigation is provided in the document either, nor is there consideration given to peat movement around the site.

As previously discussed in this checking report, robust mitigation will be required to satisfy the guidance in areas of medium risk which are significant on this site. Mitigation for the site is described in section 6.0 of the reporting.

It is noted in section 6.2 of the reporting that embedded mitigation measures have been applied in the design of the windfarm, these include, where possible, siting infrastructure on flatter ground away from deeper peat identified in the phase 1 probing survey.

Location specific mitigation is provided in Table 13 of the PLHRA. Mitigation is provided for each risk zone identified in Figure 13.1.9. The mitigation provided in this table is considered relatively generic and not specifically targeted to the risks identified in the risk assessment. Further detail / clarification of practices is required particularly in the case of medium risk zones in order to satisfy the ECUBPG. Most mitigation for Turbines includes micro siting to avoid areas of deeper peat but given the depths of peat shown on Figure 13.1.6, this does

not appear to be credible for Turbines T6,T4 and potentially T1,T2 and T16. Peat depths directly below turbines are not clear on the figure and all turbines are required to be checked for potential microsites issues.

More generic / best practice mitigation is provided in section 6.3 of the PLHRA reporting. These measures include further ground investigation to refine the assessment of risk, detailed drainage design, identification of suitable stockpiling locations etc. This information is considered appropriate.

4.0 SUMMARY AND RECOMMENDATIONS

4.1 Summary of Developers PLHRA

The following provides a summary of the developer's PLHRA making reference to whether or not adequate and appropriate field survey, peat sampling and analytical methods have been employed to assess peat stability and associated landslide risks including mitigation.

Desk Study

Generally, the desk study provides a robust backbone to the assessment and is considered suitable for purpose. However, information is lacking in some areas that should be including in the reporting, these include experience gained from the existing windfarm, local information, historical review etc.

Field Surveys

Field surveys for the site are generally considered acceptable, departures from the guidance are not significant and do not reduce the validity of the assessment. A site wide (phase 1) and detailed, infrastructure specific (phase 2) probing survey along with coring has taken place. Clarification as to probing regime around ancillary infrastructure such as borrow pits and construction compounds is required. Appropriate mapping showing the findings is provided.

Integration of Desk Study and Field Surveys

Mapping has been produced to display the findings of the field and desk based surveys for the site. These include peat depth, slope angle and geomorphology. Mapping is complete to a standard consistent of that required to satisfy the ECUBPG. Although, historical slip activity noted within the text should be included in mapping.

Hazard Assessment – Likelihood

A weighted factor based approach has been used to characterise peat slide likelihood on the site. This approach combines scores for 3 factors to produce an overall likelihood. This methodology is considered acceptable under the ECUBPG. The scoring rationale for each of the 3 factors is explained within the reporting, and a workflow for the assessment is provided. Some further clarification regarding the selection of factors is required.

Hazard Assessment – Consequence

Consequence assessment on the site has been undertaken by looking at the distance and topographical variance between proposed construction on the site and identified receptors. The receptors on the site are predominantly water courses and the proposed / existing wind farm infrastructure itself. The assessment is generally complete to a standard that satisfies the guidance.

Calculation of Risk

Risk is calculated by multiplying the normalised scores for likelihood and consequence together to produce a maximum score of 25. This is evenly split into 4 risk categories, negligible to high. The methodology for the calculation of risk is considered acceptable and consistent with the ECUBPG. Risk on the site as a whole is predominantly low to medium.

Proposed Mitigation

The risk identified in areas surrounding infrastructure in the south of the site was predominantly medium and therefore specific (targeted) mitigation was required for large sections of the site. The PLHRA document provides good general mitigation and best practice however, it lacks specific / targeted mitigation for medium risk locations on the site.

4.2 Summary Outcome of Checking Report

The following comprises the summary outcome of the checking report:

- The PLHRA **requires minor revisions**: although much of the PLHRA is sound, one or two key elements are considered to be insufficiently robust to support the PLHRA conclusions and minor revisions are required; areas for attention will be advised in the review findings and may be progressed by the developer through either an appendix to the original submission or by clarification letter.
- It is considered that the key issue to address is that there is a significant proportion of the development proposed to be located in medium risk areas, including 7 of the 16 turbines and associated infrastructure. ECUBPG, as stated, in the PLHRA itself records the project should not proceed unless the hazard can be avoided or mitigated in these locations. It is considered that the mitigation proposed is not detailed/specific and credible enough at this stage to demonstrate that the hazard ranking can be reduced to low or less. A detailed response to this point is requested in order to allow sign off of the issue.

4.3 Recommendations

The following recommendations are made:

Recommendations requiring response from Developer:

- While the desk study is generally considered consistent with a level required to satisfy the guidance some potential sources of information have potentially been overlooked. These sources include but are not limited to; information obtained during the construction and operational phase of the existing windfarm, local knowledge from landowners / land managers, historical mapping, newspaper articles etc. Please provide comment on whether these resources have been considered and update the desk study to reflect their findings where necessary.
- Probing of borrow pits, construction compounds, substations etc should have been undertaken in detail during the investigation. Please provide details of the probing beneath such infrastructure or justification for the lack of probing in such areas. Includes the section of track between T8 and T9 where probing is not on the track itself.
- Section 4.7 of the PLHRA lists six contributory factors that would typically be considered: peat depth, slope angle, historical instability, substrate material, vegetation cover and hydrology. Please provide some clarification as to why only 3 factors from the identified six were carried forward to the assessment.
- The mitigation provided in Table 13 is considered generic and not specifically targeted to the risks identified in the risk assessment. Further detail / clarification of practices is required particularly in the case of medium risk zones in order to satisfy the ECUBPG.
-

Recommendations made for information only – no response required:

- No likelihood mapping is provided for the site. In future reporting it might be beneficial to have mapping displaying peat slide likelihood across the site.
-

PEAT LANDSLIDE HAZARD RISK ASSESSMENT

CORRIEGARTH II WIND FARM

STAGE 2 CHECKING REPORT



Scottish Government
Riaghaltas na h-Alba
gov.scot

ENERGY CONSENTS UNIT

IronsideFarrar
Environmental Consultants
50782 | Oct 2021

Contents

1.0	INTRODUCTION	1
1.1	Context to Report	1
1.2	Audit Methodology	1
1.3	Documents Reviews	1
2.0	STAGE 2 CHECKING REPORT	2
3.0	SUMMARY AND RECOMMENDATIONS	6
3.1	Summary Outcome of Checking Report	6
3.2	Recommendations	6

History/ Stage

This document has been prepared to audit Peat Landslide and Hazard Risk Assessments on behalf of the Scottish Government Energy Consents Units.

The Stage of the Checking Point and history of the document is as follows:

Stage	Date	Description	Author	Checked/ Approved
1	21.04.21	Stage 1 Checking report for Developer's PLHRA	Blair Kilpatrick BSc, MSc, FGS, Project Geologist	Mark Chapman, BSc, MSc, CEng, MICE
2	06.10.21	Stage 2 Audit of Developer's Response	Blair Kilpatrick BSc, MSc, FGS, Project Geologist	Nick Matheson, BSc, CGeol, FGS

1.0 INTRODUCTION

1.1 Context to Report

The Scottish Government Energy Consents Unit is responsible for processing applications under sections 36 and 37 of the Electricity Act 1989 to develop electricity generation projects and overhead electric lines. In addition, under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, Scottish Ministers are required to consider the environmental impacts of the proposal. EIA Development applications are therefore required to be supported by EIA Reports, which include site-specific information and survey details in respect of the risk of peat landslide events for elements of the proposal and its infrastructure (i.e. construction of roads, access, tracks, wind turbine foundations etc).

The Energy Consents Unit commissioned Ironside Farrar Ltd to technically assess the Peat Landslide Hazard and Risk Assessment(s) (PLHRAs) submitted by developers.

This Stage 2 Checking Report will consider whether or not responses received from Developers to Stage 1 Check Report Recommendations adequately address the issues raised.

The checking report will provide a summary of findings and recommendations and the Energy Consents Unit will issue a copy to the development in accordance with the requirements of the Best Practice Guide (Scottish Government, 2017).

1.2 Audit Methodology

This audit primarily reviews the information submitted by the developer against the guidance provided in:

- Peat Landslide Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments, Energy Consents Unit Scottish Government, Second Edition, April 2017.

1.3 Documents Reviews

The documents reviewed as part of this audit were:

Stage 1 Audit:

- Corriegarth 2 Wind Farm, EIAR Volume 3, Technical Appendix 13.1, Peat Landslide Risk Assessment, ARCUS, September 2020.
- Corriegarth 2 Wind Farm, EIAR Volume 3, Technical Appendix 13.2, Outline Peat Management Plan, ARCUS, September 2020.
- Corriegarth 2 Wind Farm, EIAR Volume 1, Chapter 13 Geology and Peat, ARCUS, September 2020.

Stage 2 Audit:

- Proposed Corriegarth 2 Wind Farm: Response to IFL Stage 1 Checking Report, 23/06/21, Arcus

2.0 STAGE 2 CHECKING REPORT

The following table comprises the Stage 2 Checking Report:

No.	Stage 1 Checking Report Comment	Developer Response	Stage 2 Checking Report Comment	Recommendations
i)	While the desk study is generally considered consistent with a level required to satisfy the guidance some potential sources of information have potentially been overlooked. These sources include but are not limited to; information obtained during the construction and operational phase of the existing windfarm, local knowledge from landowners / land managers, historical mapping, newspaper articles etc. Please provide comment on whether these resources have been considered and update the desk study to reflect their findings where necessary.	The information sources listed in Section 2.3 of the PSRA also highlights that BGS Online GeoIndex was consulted, which has provided historical landslide context. Section 2.2.3 Geomorphology of the PSRA describes historic failures noted following a review of aerial photography and site visits. In addition, the developer provided local information regarding the operational site (provided by the operators of Corriegarth 1 Windfarm), which informed our assessment. Several site visits completed by a variety of Arcus staff, including joint visits between our technical advisers and estate representatives to review site conditions, and 'lessons learned' from the initial development. All of the information informed the assessment and overall design of the Development. We consider adequate sources were reviewed, discussed and assessed with regard to the submitted PSRA.	The response provided is considered acceptable. Please note in future reporting that this information should be included in the PLHRA to support the desk study assessment.	No further response is considered necessary.
ii)	Probing of borrow pits, construction compounds, substations etc should have been undertaken in detail during the investigation. Please provide details of the probing beneath such infrastructure or justification	The main proposed borrow pit is located adjacent to an existing borrow pit for the operational site which was likely chosen (amongst other reasons) due to the low to zero peat presence. Several site visits were undertaken where it was confirmed, through professional judgement and analysis of site conditions, that the proposed borrow pit	The response provided is considered acceptable. Please note in future reporting that this information should be included in the original PLHRA.	No further response is considered necessary.

No.	Stage 1 Checking Report Comment	Developer Response	Stage 2 Checking Report Comment	Recommendations
	for the lack of probing in such areas. Includes the section of track between T8 and T9 where probing is not on the track itself.	location was suitable due to the rocky outcrop nature of the location. Photos of the proposed borrow pit areas are included in Section 3.2.1.1 of Technical Appendix 4.1: Borrow Pit Assessment BPA, which show no key indicators of peat at this location with evidence of rock outcrops and also a profile where the cut in the track is showing, thin soils cover onto weathered rock. Given the conditions encountered, Arcus concluded that additional peat probing was not required. The second borrow pit was included for flexibility and would only be used in the event that the initial borrow pit was fully utilised. Phase 1 probing has been undertaken in this location, with peat shown to be < 1 m. The proposed substation is located within the proposed borrow pit, and therefore requires no peat consideration in light of the above. The proposed construction compound is largely the same location as that used for the built scheme and located on existing or former hardstanding associated with the operational site infrastructure and therefore requires no further probing. Peat probes are not present on the proposed track between T8 & T9; this is due to the track layout altering late in the project programme. It is however clear from the peat interpolation that this section of track will be located in deep peat therefore additional peat probing would only confirm this known fact. Due to the deep peat, floating track, as per the EIA Report, is proposed at this location which will reduce the disruption of peat. Other stated mitigation will		

No.	Stage 1 Checking Report Comment	Developer Response	Stage 2 Checking Report Comment	Recommendations
		be applied in order to minimise peat slide risk. Peat probing, confirming that deep peat is present, would not alter the findings of the assessment. This area will be subject to more detailed exploration as part of the pre-construction geotechnical ground investigations. As the design and PSRA assumes deep peat is present in this location, we concluded that further probing would not be required at this stage of the development.		
iii)	Section 4.7 of the PLHRA lists six contributory factors that would typically be considered: peat depth, slope angle, historical instability, substrate material, vegetation cover and hydrology. Please provide some clarification as to why only 3 factors from the identified six were carried forward to the assessment.	Section 4.7 of the PRSA notes all considerations and states that the principal factors are peat depth and slope gradient; however, this statement does not mean that the other factors were excluded from consideration. All factors were considered in the assessment with vegetation noted in section 4.4, Appendix D of the PSRA and in full detail in Chapter 7 Ecology of the EIA Report. Furthermore substrate, habitat and hydrology are explicitly referenced within Appendix C Hazard Rank Assessment Records of the PSRA, and demonstrate that they clearly form part of the assessment. This demonstrates that all factors were considered.	The response provided is considered acceptable. Please note in future reporting that the information referenced within this response should be highlighted within the PLHRA document in order that the assessment is understood correctly.	No further response is considered necessary.
iv)	The mitigation provided in Table 13 is considered generic and not specifically targeted to the risks identified	The submitted PSRA details mitigation required at each Hazard Area; this, combined with the Embedded Mitigation in section 6.2 and section 6.3 Peat Slide Mitigation	While it is noted that detailed ground investigation will be undertaken and that this will improve the understanding of ground conditions relating to peat land slide risk and the potential movement of proposed infrastructure it is	Further response from the consultant is required in regard to the mitigation of

No.	Stage 1 Checking Report Comment	Developer Response	Stage 2 Checking Report Comment	Recommendations
	in the risk assessment. Further detail / clarification of practices is required particularly in the case of medium risk zones in order to satisfy the ECUBPG.	Recommendations, provides, in our view, sufficient mitigation at this stage of the development process to form a basis for any detailed mitigation which follows. Further mitigation would be informed by intrusive ground investigations. It is anticipated that a detailed ground investigation of the final layout could form part of a planning condition including the requirement for a Construction Environmental Management Plan (CEMP) to include updates to the Peat Management Plan (Technical Appendix 13.2) detailing peat mitigation. The developer would accept an appropriately worded condition to ensure the ground investigation work is included as part of the CEMP preparation.	not considered an appropriate substitute for robust / detailed infrastructure specific mitigation at this time. The mitigation provided in table 13 appears to be the same whether the area is in low or medium risk, further clarity is sought on what further best practice methods will be employed for medium risk areas and where micro-siting is considered whether this is for a turbine base or other infrastructure. The floating of roads is considered acceptable mitigation. Section 5.6.1 of the ECUBPG states that areas of medium risk should be avoided, and where not possible the proposed design should be modified to incorporate engineering measures to reduce or eliminate the assessed risk. The risk mapping proved in the PLHRA indicates that a significant proportion of the development footprint is in a medium risk area. We would like to seek clarification on whether figure 13.1.9 accurately depicts the risk on the site or is it the case that smaller pockets of medium risk been extrapolated to give a worst case scenario for the larger areas? It is difficult to know this without likelihood and consequence discussion/ supporting mapping, both of which are not presented in the PLHRA. Are there more specific areas of medium risk that can be appropriately targeted in terms of specific mitigation? Targeted mitigation may involve a micro-siting plan overlayed on peat depth (following the embedded mitigation discussed in the PLHRA) or infrastructure specific descriptions defining mitigation procedures. Other mitigation for the medium risk areas might include development of specific of geotechnical risk registers, attendance of geotechnical specialist during the works, tool box talks, sediment control, slope and excavation support,	medium risk locations.

3.0 SUMMARY AND RECOMMENDATIONS

3.1 Summary Outcome of Checking Report

The following comprises the summary outcome of the Stage 2 checking report:

The Developer's response generally addresses the queries raised in the Stage 1 Checking report however one point still requires further clarification.

3.2 Recommendations

The following recommendations are made:

Recommendations requiring response from Developer:

Further clarity is sought in the definition of medium risk areas displayed in figure 13.1.9, are these medium risk areas extrapolated from smaller pockets of medium risk to display a worse case scenario? If so, more specific mitigation should be provided for infrastructure specific locations in order to satisfy the guidance (see table 5.4). Targeted mitigation may involve a microsite plan overlayed on peat depth or infrastructure specific descriptions defining mitigation procedures.

Recommendations made for information only – no response required:

Several pieces of information have been provided in the Arcus response to the IFL Stage 1 Checking Report. Such information could usefully be included in future Arcus PLHRA reports, potentially negating the need for a stage 2 checking process.

From: [JRC Windfarm Coordinations](#)
To: [Flaherty D \(Debbie\)](#)
Subject: Reminder- Corriegarth 2 Windfarm - Energy Consent's Consultation request [WF883620]
Date: 04 March 2021 15:15:05

Dear debbie,

A Windfarms Team member has replied to your co-ordination request, reference **WF883620** with the following response:

Dear Debbie

Name/Location: Corriegarth 2 Windfarm - Energy Consent's Consultation request

Site Centre/Turbine at NGR/IGR:

1 255650 812676
2 256065 812153
3 256563 812077
4 257157 812139
5 257690 812131
6 258376 812555
7 259091 812839
8 259524 813455
9 259249 813893
10 258820 814213
11 258262 814348
12 257669 814560
13 257161 814559
14 257136 814013
15 256358 814038
16 255875 813556

Development Radius: 0.1KM

Tip Height: 149.9m

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

The local Utility Company

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

*Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom*

Office: 02476 932 185

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 by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xdmcaaableaaa%2FrCMrwleDAugtA%3D%3D>

This email has been scanned by the Symantec Email Security.cloud service.

For more information please visit <http://www.symanteccloud.com>

By email to: Econsents_Admin@gov.scot

Energy Consents Unit
The Scottish Government
4th Floor
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

15 February 2021

Dear Sir/Madam

Corriegarth 2 Wind Farm - Installation of a wind farm comprising up to 16 wind turbines of up to 149.9 m to tip height and associated infrastructure, Corriegarth Estate, Highlands

ECU reference: ECU00002175

Introduction

1. Corriegarth 2 Windfarm Limited, a wholly owned subsidiary of BayWa r.e. UK Limited, has applied for S.36 consent to construct a wind farm with 16 turbines of 149.9m blade-tip height encircling the operational Corriegarth wind farm's 23 turbines of 120m BTH.
2. Mountaineering Scotland **objects** to turbines 8, 9 and 10 and to the height of turbines 7 and 11 on grounds of unacceptable adverse visual impact, with consequential adverse impact on mountaineering recreation.
3. We have no objection to the remainder of the proposed development.

Mountaineering Scotland

4. Mountaineering Scotland is an independent association of mountaineering clubs and individuals, with over 14,000 members who are hill walkers, climbers and snowports tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. It is recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.
5. It also acts in Scotland for the 80,000 members of the British Mountaineering Council, which fully supports Mountaineering Scotland's policy relating to wind farms and contributes financially to its policy work.
6. Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially most

damaging to Scotland's widely-valued mountain assets, consistent with its policy set out in *Respecting Scotland's Mountains*. This has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

Material considerations

a) Policy

7. Scottish Government policy strongly supports the development of renewable energy sources, including onshore wind. We do not question policy, though we interpret recent documents differently from the applicant (*cf* applicant's planning statement). We regard them as maintaining support for onshore wind while pivoting the future focus towards offshore wind, where deployment on the scale required can be achieved, and towards reorienting the economy, society and land use towards 'net zero', a much greater challenge than simply generating electricity. We do not think that onshore wind development gains greater weight from these documents than it already has in the planning balance, but even if the decision-maker disagrees, that does not mean that consent necessarily follows (as shown by the refusal of the Millenderdale appeal cited in the Planning Statement para 2.6.20 *et seq*; and more recently by the consenting of Paul's Hill 2 only with the deletion of one of the seven application turbines).
8. Policy is clear that expected economic and emissions benefits are to be balanced against potential harms in the determination of an individual planning application. *"The aim is to achieve the right development in the right place; it is not to allow development at any cost."* (Scottish Planning Policy 2014, Para 28). This has been maintained in the recent Position Statement on Scotland's Fourth National Planning Framework (Nov.2020). This states that the intention for NPF4 is that renewable energy developments should be *"appropriately located"* (p.9) and shown *"to be acceptable on the basis of site specific assessments"* (p.10). Each development needs to be judged objectively on its own merits and in its geographical context.

b) Landscape and visual impact

9. Our assessment of Corriegarth 2 is that most of the proposed turbines would have no adverse impact on mountaineering interests given the existing operational scheme but that a small number would. The proposed Corriegarth 2 turbines encircle the existing Corriegarth wind farm. Most are at base altitudes and, allowing for the higher turbines proposed, have blade-tip altitudes within the range of those of the operational turbines. Some turbines exceed this envelope and some of these would have an unacceptable visual impact on mountaineering interests.
10. The operational Corriegarth wind farm sits on a west-facing hillside with a degree of partial visual containment from the surrounding topography.¹ We do not accept the description of the site as a 'bowl' but if it is regarded as such then it is a very leaky bowl since turbines from the existing scheme are visible at hub height and lower across much of the elevated ground of the Monadhliath in the eastern half of the compass (where the main mountaineering interest affected is) with even more extensive visibility in the western half (where there are few significant Monadhliath summits and western hills are mostly distant). The proposed development would intensify this impact. In general, we do not find this unacceptable.

¹ We note an error in the EIAR Table 6.10. The second paragraph under 'Magnitude' refers to east when it means west and vice versa and to north-east when it means northwest. The error is repeated in the Planning Statement para 4.3.29.

11. The applicant appears rather desperate to promote the idea that not only is this site in a bowl but that the pattern of development in the western Monadhliath is "*of wind farm clusters generally situated within natural bowl landforms*" (EIAR p.3-10) How anyone can mischaracterise the sites of Farr (and Kyllachy) or Dunmaglass (and Aberarder) wind farms as bowls is beyond our comprehension.
12. Further evidence that the site is a very leaky bowl is evident in the ZTV. Contrary to the EIAR (para 6.6.2) visibility within 5km of the site extends across a large area to the northeast through southeast, at hub as well as blade-tip height. This is confirmed elsewhere in the EIAR at Table 6.11 para 2 under 'Magnitude'.
13. Corriegarth and the proposed Corriegarth 2 form part of a ribbon of high altitude wind farms spaced along the western Monadhliath. Its visual impact must be judged in the context of that baseline but also in the context of the gentle topography of the highest summits.
14. Seen from hills to the west and northwest (Viewpoints 11, 15, 18), the main effect of Corriegarth 2 would be an intensification of turbines in the development area. These hills are mostly fairly distant with the closest of note being Meall Fuar-mhonaidh (13 km; viewpoint 11). In clear non-hazy conditions, which the baseline photography does not reflect, there is a panoramic view of the western Monadhliath. In the north, Farr and (more strikingly) Dunmaglass turbines are the most prominent features in their vicinity, overshadowing – literally in Dunmaglass's case - the highest natural features. (This would be exacerbated if the proposed increase in turbine height is allowed at the consented but unconstructed Aberarder site, adjacent to Dunmaglass, potentially giving blade tip altitudes of 945m OD against the nearby hilltops of 802-807m.) To the south, the relative containment of Stronelairg and Corriegarth has thus far avoided such an effect. From viewpoint 11, however, individual Corriegarth 2 turbines are seen as having a particular prominence: turbines 8 to 11.
15. Seen from the southwest and south (Viewpoints 13, 14, 17) the proposed development intensifies the visual impact of Corriegarth within a landscape punctuated by multiple wind farms. From the south (Vp13), however, turbines 8-10 appear individually prominent because of their partial tower visibility (compared with other turbines showing only hubs or blades) but this is in the context of a wider landscape characterised by wind farms rather than topography.
16. Seen from the east, where there is visibility from the Munros and Corbetts of the eastern Monadhliath, the impression of Farr (and Kyllachy) and Dunmaglass (and Aberarder) is of turbines on the seemingly level hill tops, perceived collectively as a plateau since the dissecting glens are typically imagined by the viewer rather than observed. Corriegarth has thus far avoided this effect. Corriegarth 2 would undo some of this topographic mitigation, particularly where towers are visible: turbines 8 to 10 and sometimes 7. This can be observed at viewpoint 9 (a Munro) - where turbines 8-10 compete with Carn na Saobhaidhe (811m) for attention and, being kinetic, would win. It is also evident at Wild Land viewpoints 3, 5 and 7 (respectively a Munro Top (subsidiary summit), a Corbett and a Munro).
17. Wild Land viewpoint 3 is particularly useful since it offers a more southerly eastern viewpoint without operational turbines in the foreground (cf Vp 13 foregrounded by Stronelairg wind farm). This enables a clearer appreciation of the impact of Corriegarth 2 added to Corriegarth. It shows the general intensification of visual effect and the substantial contribution to this from the small number of turbines with visible towers and located at a high altitude (turbines 7 to 11). Corriegarth and Corriegarth 2, both alone and combined with Dunmaglass/Aberarder, change the viewer's perception of scale and distance. The turbines are not interpreted as the size they actually are and as a consequence the perceived extent of 'wild' land is diminished. The interruption in the view to the distant hills of Affric – thickets of turbine towers sometimes

appearing almost as fencing – also contributes to this diminution of perceived scale. The perceived expansive landscape has been shrunk. Some of the proposed Corriegarth 2 turbines would shrink it further.

18. From the north, the viewpoint of Beinn Bhreac Mhor again suggests that specific turbines are unduly prominent: turbines 8 to 10. Although turbine 9 is obscured to hub height by Carn na Saobhaidhe (811m), it is striking that a full blade-length is visible on the wireline rising above Carn na Saobhaidhe in this almost level view between summits, while the summit is framed by the partly-visible towers of Turbines 8 and 10. Compare this with the almost complete lack of visibility of Corriegarth currently. Bringing turbines too far up the hill leads to the hills becoming subservient to the turbines, as is already evident with the Dunmaglass turbines visible in the baseline photography.
19. We find it remarkable that the LVIA has almost no regard to the impact on the Corbett Carn na Saobhaidhe (at 811m OD, not the 602m (603m on some maps) knoll of the same name within the development site). In the substantive assessment part of the LVIA chapter, there are three mentions of Carn na Saobhaidhe 602m and only one of Carn na Saobhaidhe 811m. The latter is the highest hill in the western Monadhliath and the closest 'listed' hill to the proposed development (<1 km from the nearest turbine), yet the applicant deliberately chose not to select it as a viewpoint and the LVIA clearly regards it as of no consequence.
20. One of the site-specific design objectives was

"Minimise additional effects by avoiding the highest ground and sensitive skylines formed by the surrounding hills and ridges which contain the interior of the Site, including Carn Ruighe na Gaoithe and Beinn Bhùraich (780 m AOD) to the north, and Carn a' Choire Sheilich (791 m AOD) and neighbouring summits to the south, south-east". (EIAR p.3-9)

It is odd that there is no mention here of Carn na Saobhaidhe (811m), the surrounding hill on the east side of the site, which the proposed design insensitively compromises.

21. The applicant claims for the final design, presumably based on the use of Carn Sgulain as one of the design viewpoints:

*"Additional effects on **WLA20** and **CNP** minimised by **avoiding the highest ground** formed by the surrounding hills and ridges which contain the interior of the Site" (Figure 3.8, emphasis in original)*

We do not agree that this has been achieved from the perspective of mountaineering interests. It is accepted that the effects are less than they would have been had turbines been placed on the very highest ground, but that does not mean they have been minimised. An improved design would reduce them further. (We have no position in relation to WLA20 or the CNP.)

22. Carn na Saobhaide (811m) barely maintains primacy over the existing turbines, with the highest having a blade-tip altitude of c.820m. However the proposed development would have several turbines exceeding this. Turbines 5 to 11 would have blade-tip altitudes of 840m or greater. However, turbines 5 and 6 (c.850m OD BT altitude) are substantially shielded by topography and do not have a significant impact. Turbines 7 (c.850m) and 11 (c.840m) gain prominence by their size compared with the existing turbines (exacerbated in the case of turbine 7 by its position in a col) but would be acceptable if the same dimensions as the existing turbines (120m BTH). The undue prominence of turbines 8 to 10, however, cannot be similarly mitigated. They would dominate the highest landform in the western Monadhliath with blade-tip altitudes around 880-890m OD and hub altitudes (c.810-820m) equalling or exceeding the Corbett summit (811m).
23. The transition from a landscape with wind farms to a wind farm landscape is not simply a question of the number of turbines in view and how they are clustered. It also depends on how

turbines relate to the topography and how that relationship is perceived by the viewer. The north of the western Monadhliath is becoming a landscape where turbines are the primary visual feature, driven by their overtopping of what is naturally a recessive landform with few natural landmarks or scale indicators. To the south this is not (yet) the case. Applications around Stronelaig and the Corriegarth 2 application could make it so. At Corriegarth, consenting the application scheme without modification would remove any semblance of containment within a 'bowl', even a leaky one. The relationship between landscape and turbines in the southwest Monadhliath is at a tipping point as to which will be dominant.

24. In the case of Corriegarth 2, the relationship would remain one of turbines being subservient to the landscape if the proposed scheme was amended to remove turbines 8 to 10 and to reduce the height of turbines 7 and 11. It may be possible to compensate for the generating capacity thus lost by installing more turbines further down the hill, though this would depend on other technical and environmental constraints.
25. In summary, the LVIA is rather more benign than is our assessment. Our assessment has repeatedly identified that most of the proposed turbines have no adverse impact but a small number do, usually attributable to the visibility of partial towers (when most turbines would be visible only as hubs or blades). This, their base altitude and their blade-tip height and altitude makes them prominent; and where they encroach upon the unassuming dome of Carn na Saobhaidh (811m) they become dominant over their setting. Turbines 8 to 10 are consistently identifiable from upland viewpoints as the turbines responsible for this adverse visual impact. From some angles of view turbines 7 and 11 have an adverse impact but in neither case to the same extent as turbines 8-10 and in both cases attributable to scale discordance – 149.9m rather than 120m turbines.

c) Tourism and recreation impact

26. The potential effect of windfarm developments on the tourism and recreation sector has been very poorly researched, and in the absence of robust research and with strong vested interests disinterested in undertaking such research, applicants and their consultants, politicians, planners and Reporters are misled into assuming that an absence of good evidence means there is no impact. We disagree and our analysis of all the relevant literature suggests that wind farms do have an effect but only in certain circumstances. In much of Scotland, and for most tourists, wind farms are no serious threat to tourism: good siting of wind farms mean they can co-exist. However, an impact is likely in areas where large built structures are dissonant with expectations of landscape quality and where a high proportion of visitors come from the 25% of tourists who are particularly drawn by the quality of Scotland's upland and natural landscapes. This includes mountaineering visitors.
27. Notwithstanding that general proposition, which is consistent with all the available evidence, assessment of the potential specific impact of Corriegarth 2 suggests that it would be limited. There is a substantial baseline of wind farms. The existing Corriegarth is not the most prominent or visually intrusive element of the baseline. Dunmaglass is, because it is perceived – especially from the east – as rising above the plateau landscape rather than being subservient to it – with towers clearly visible. We have suggested above how Corriegarth 2 could be modified to avoid repeating that mistake. Since any impact of wind farms on tourism and recreation activity and quality is a consequence of visual impact, if the proposed scheme is modified to ensure that its visual impact is not unacceptable, then any tourism and recreation impact would also be minimised.
28. The applicant's tourism and recreation assessment appears ill-informed. We cannot understand how the authors think that *"The Monadhliath Mountain Range lies approximately 260 m south-*

west of the nearest turbine location." (EIAR p.14-15). Was it where the name was placed on a map they were using? This lack of understanding leads to such inanities as *"The Site itself is not within the Monadhliath mountain range ..."* (p.14-26). Really? While the following statement in the assessment of tourism effects simply leaves us baffled at what 'the entire mountain range' is if it is not the Monadhliaths.

"The Monadhliath Mountain Range will not experience significant visual effects. Visibility of the Development will be limited to nearby locations within the Monadhliath Mountain Range which is only a small section of the entire mountain range." (EIAR p.14-31)

29. Our suspicion is that only a desk-top exercise was undertaken, uninformed by any direct knowledge, experience or understanding of the site and its context. Furthermore, the assessment only references accommodation on the west side of the Monadhliath but anyone with local knowledge would know that most of the hillwalking access is taken from the east, from Strathspey, with some via Strathdearn (cf TA 6.4, Section 4.1.5.3 for a more informed statement).

Conclusion

30. Mountaineering Scotland does not object to the principle of an extension to Corriegarth wind farm. However, it regards specific turbines in Corriegarth 2 – some of those at the highest altitudes – as creating unacceptable visual impacts, especially seen from the Munros and Corbetts to the south, east and north. It **objects** to turbines 8, 9 and 10 of the proposed development and to the height of turbines 7 and 11 on grounds of unacceptable visual impact, with consequential impact on mountaineering recreation. Mountaineering Scotland would have no objection to the proposed development if turbines 8-10 were deleted (nor any objection to replacement capacity at lower altitude if other constraints would allow this) and turbines 7 and 11 reduced to 120m BTH.

Yours sincerely

Redacted

Stuart Younie

CEO, Mountaineering Scotland



From: [NATS Safeguarding](#)
To: [Flaherty D \(Debbie\)](#)
Subject: RE: Corriegarth 2 Windfarm - Energy Consent's Consultation request [SG29451]
Date: 04 February 2021 09:56:22
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Our Ref: SG29451

Dear Debbie

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 sincerely



NATS Safeguarding

E: natssafeguarding@nats.co.uk

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



REDACTED