



Debbie Flaherty
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Energy Consents Unit
The Scottish Government
By Email Only: Debbie.flaherty@gov.scot

23rd June 2021

Dear Ms Flaherty,

ECU00002175: Proposed Corriegarth 2 Wind Farm: Response to Ironside Farrar Stage 1 Checking Report

In reference to the above project, Arcus Consultancy Services Ltd (Arcus) has prepared this clarification letter in response to the Ironside Farrar Ltd Stage 1 Checking Report (the Checking Report) dated 21st April 2021.

The Checking Report was submitted in response to the Section 36 application for Corriegarth 2 Wind Farm ('the Development') submitted to the Energy Consents Unit (ECU) in January 2021. The Checking Report provided comment on the Peat Slide Risk Assessment (PSRA) included as Technical Appendix 13.1 within the EIA. The Ironside Farrar recommendations and subsequent Arcus clarifications are summarised in the table below.

IF Recommendation (requiring response)	Arcus Response
<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.</i>	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.

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.

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 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 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.

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 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.

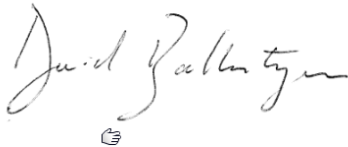
The submitted PSRA details mitigation required at each Hazard Area; this, combined with the Embedded Mitigation in section 6.2 and section 6.3 Peat Slide Mitigation Recommendations, provides, in our view, sufficient mitigation at this stage of the development process to form a basis for any detailed 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.

I trust this clarification addresses Ironside Farrar's comments within the Checking Report, however, if you have any further queries, please do not hesitate to contact the undersigned.

Yours sincerely,



David Ballentyne
Principal Engineer