



Debbie Flaherty
Consents Manager
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU
By Email Only: Debbie.flaherty@gov.scot

01 April 2021

Dear Ms Flaherty,

Proposed Corriegarth 2 Wind Farm: Response to ScotWays Consultation

Overview

I am writing with regards to the consultation response that the Scottish Rights of Way and Access Society (ScotWays) submitted to the Scottish Government on 03 March 2021, in relation to the proposed Corriegarth 2 Wind farm (the Development).

In its response, ScotWays highlighted some perceived gaps in the baseline of the Environmental Impact Assessment Report (EIA Report). Specifically, ScotWays stated, *"Although there are core paths and some long distance recreational routes noted, the applicant has not considered all the public recreational routes within this wider area: the recreational baseline for this application is therefore incomplete."*

From the map attached to the ScotWays consultation response, and from references within the response itself, ScotWays notes the following Public Rights of Way (PRoW) and routes are not identified within the baseline of the EIA Report:

- HI/HI111/1 (PRoW);
- HI/HI98/1 (PRoW);
- HI/HI112/2 (PRoW);
- HI/HI106/1 (PRoW);
- Old Road to Coignafearn (Heritage Trail);
- Glen Markie Track (Heritage Trail); and
- Scottish Hill Tracks.

This letter highlights where each of the aforementioned routes and, where appropriate, users are considered within the EIA Report.

Pre-submission Consultation

The baseline information included within the EIA Report was collected via a desk-based study, presenting information from consultation responses and available online resources.

A Scoping Report for the Development was submitted in February 2020; this Scoping Report sought the views of consultees on the proposed scope of assessment for the EIA Report. Following the

agreed consultation period, the Energy Consents Unit (ECU) issued a Scoping Opinion based on consultee responses. There was no ScotWays response received in reply to the Scoping Report.

The baseline information was therefore informed by the following:

- Highland Council scoping response, online data, and information sources;
- ScotWays online data and information sources;
- Sustrans online data and information sources; and
- British Horse Society consultation response.

Clarifications

The environmental impact of all recreational receptors is considered in full within the EIA Report, including all routes referred to by ScotWays in its March consultation response. ScotWays acknowledges that HI/HI111/1, whilst not shown on Figure 14.1, follows other recreational routes that are identified and assessed within the EIA Report. Table 1 below has been produced to detail where this is the case.

In addition to Chapter 14: Socio-Economics, Recreation and Tourism of the EIA Report, effects on views and visual amenity experienced by recreational receptors (people) are assessed in Chapter 6: Landscape and Visual Amenity and its supporting appendices. It is important that the EIA Report is read as a whole, with chapters covering a broad range of receptors; reading both Chapter 14 and Chapter 6 in conjunction is particularly important as the chapters share baseline information and fundamental elements of assessment due to the similar nature of both topics' receptors.

The following table outlines that aforementioned routes identified by ScotWays are assessed in the EIA Report, where appropriate, and provides a summary of how the EIA Report addressed the relevant receptors.

Table 1: Assessment Summary

ScotWays Identified Route	Route Type	EIA Report Assessment Summary
HI/HI111/1	PRoW	This PRoW follows the route of both Core Path IN25.02 and Trail of the Seven Lochs – both of which are assessed in full in Chapter 14 of the EIA Report. As per Chapter 14, Core Path IN25.02 will be subject to negligible, short-term and not significant construction tourism and recreation effects. Operational tourism and recreation effects were not considered due to a lack of visibility of the Development from the receptor. As per Chapter 14, the Trail of the Seven Lochs will be subject to no construction tourism and recreation effects, and negligible and not significant operational tourism and recreation effects. Chapter 6 scoped out the effects on views from the Trail of the Seven Lochs, and the core paths which form sections of the Trail of the Seven Lochs, along with the section of HI/HI111/1 PRoW. This was due to a lack of actual visibility as a result of intervening forestry and woodland screening limited blade tip views, as per ZTV figures 6.3b and 6.4b of the EIA Report. Therefore, the HI/HI111/1 PRoW is fully considered and assessed within the EIA Report, where appropriate, with no significant effects anticipated in terms of visual effects, and tourism and recreation effects.

ScotWays Identified Route	Route Type	EIA Report Assessment Summary
HI/HI98/1	PRoW	This PRoW follows the route of both Core Path IN25.01 and the South Loch Ness Trail – both of which are assessed in full in Chapter 14 of the EIA Report. As per Chapter 14, Core Path IN25.01 falls under the assessment of 'Offsite Recreation and Recreational Routes' and is therefore assessed to be subject to negligible and not significant construction tourism and recreation effects. Similarly, operational tourism and recreation effects were assessed to be negligible and not significant. As per Chapter 14, the South Loch Ness Trail will be subject to no construction tourism and recreation effects, and negligible and not significant operational tourism and recreation effects. Within Chapter 6, Viewpoint 4 is representative of views from the HI/HI98/1 PRoW; the assessment concluded moderate, significant visual effects. Therefore, the HI/HI98/1 PRoW is fully considered and assessed within the EIA Report, with no significant tourism and recreation effects anticipated; and a significant visual effect predicted.
HI/HI112/1	PRoW	This PRoW follows the route of the Trail of the Seven Lochs, which is assessed in full in Chapter 14 of the EIA Report. As per Chapter 14, the Trail of the Seven Lochs will be subject to no construction tourism and recreation effects, and negligible and not significant operational tourism and recreation effects. Chapter 6 scoped out the effects on views from the Trail of the Seven Lochs, and the core paths which form sections of the Trail of the Seven Lochs, along with the section of HI/HI112/1 PRoW. This was due to a lack of actual visibility as a result of intervening forestry and woodland screening limited blade tip views, as per ZTV figures 6.3b and 6.4b of the EIA Report. Therefore, the HI/HI112/1 PRoW is fully considered and assessed within the EIA Report, with no significant effects anticipated in terms of visual effects, and tourism and recreation effects.
HI/HI106/1	PRoW Scottish Hill Track	This PRoW and Hill Track is considered within Technical Appendix (TA) A6.4 Wild Land Impact Assessment found within Volume 3 of the EIA Report. The TA accompanies Chapter 6 and includes a number of assessment points agreed with NatureScot to support the assessment of effects on each wild land quality. In accordance with NatureScot Guidance¹, and unlike the representative viewpoints considered within the LVIA, views from these assessment points are not assessed within the wild land impact assessment, rather they are used as a means of understanding and illustrating the effects upon each of the wild land qualities. Wild land assessment point 1 (WLA1): River Eskin Estate Track is detailed in Table A6.4.3 and illustrated by the wireline visualisation presented as Figure 6.40 in Volume 2c of the EIA Report. WLA1 is located on River Eskin Estate Track, which forms part of the PRoW and hill track. Figure 6.40 illustrates the maximum case visual effects that will arise from the introduction of the Development from the HI/HI106/1 route. This is further illustrated by the limited extents of additional visibility which the Development will introduce to views from a short section of this hill track, as shown by the Zones of Theoretical Visibility (ZTVs) on Figures 6.17 to 6.20 of Volume 2b of the EIA Report.

¹ NatureScot (September 2020). Assessing Impacts on Wild Land Areas – Technical Guidance

ScotWays Identified Route	Route Type	EIA Report Assessment Summary
Old Road to Coignafearn	Heritage Path ²	This Heritage Path was also considered in the Technical Appendix (TA) A6.4 Wild Land Impact Assessment, and is shown on Figures 6.17 to 6.20 of Volume 2b of the EIA Report. Figure 6.17 shows clearly that the ZTV for the Development only extends to a very limited section of the Old Road to Coignafearn Heritage Path route, and no visibility is predicted from distances within 10 km of the Development. Similar views are predicted from nearby LVIA VP9: Carn Sgulain (also WLA4 in TA6.4) which is illustrated by Figure 6.29 of Volume 2c of the EIA Report. Minor and not significant visual effects are predicted to arise from this viewpoint approximately 2 km west of the heritage Path route. Similar views are also anticipated from WLA5: A'Chailleach illustrated by Figure 6.43 of Volume 2c of the EIA Report, which illustrates views experienced by recreational receptors from this Munro hill summit within the Cairngorms National Park and approximately 2 km east of the Heritage Path route. The vast majority of the route will not experience views of the Development as the heritage path largely follows valleys which dissect the interior plateau of the Monadhliath Mountains. Any visibility would occur beyond the 10 km study area of Chapter 14 of the EIA Report.
Glen Markie Track	Heritage Path ² Hill Track	This Heritage Path was also considered in the Technical Appendix (TA) A6.4 Wild Land Impact Assessment, and is shown on Figures 6.17 to 6.20 of Volume 2b of the EIA Report. Figure 6.17 shows clearly that the ZTV for the Development only extends to a very limited section of the Glen Markie Track. The vast majority of the route will not experience views of the Development as the heritage path largely follows valleys which dissect the interior plateau of the Monadhliath Mountains. Similar views are predicted from LVIA VP13: Geal Charn which is illustrated by Figure 6.33 of Volume 2c of the EIA Report. Given the influence of the existing Stronelairg Wind Farm on views from this location, minor and not significant visual effects are predicted to arise from this nearby viewpoint. The Heritage Path passes through the eastern extents of the Stronelairg Wind Farm for approximately 2.5 km, whilst extensive visibility of other operational and consented wind farms is possible from the route (as illustrated by Figure 6.19 to 6.20 Volume 2b of the EIA Report). Consequently, the introduction of the Development will not significantly alter the experience of recreational users (visual receptors) of the Heritage Path.

As demonstrated by Table 1, the EIA Report considers and, where appropriate, assesses the PRowS and other routes that ScotWays identify in its consultation response letter to the ECU.

² In the absence of spatial data, heritage paths, shown on EIA Report Figures, were digitised by Landscape Consultants based on known and publicly available information.

We trust that the clarification provided satisfactorily demonstrates that the potential environmental impact of all recreational receptors has been included within the EIA Report and that the decision-maker can have certainty that all receptors have been considered, where appropriate, throughout the EIA Report. We hope this clarification is sufficient for ScotWays to remove its objection.

Should any further clarification be required, or if ScotWays would be amenable to a meeting to discuss this response, please do not hesitate to contact the undersigned.

Yours sincerely,

Heather Kwiatkowski
Principal Environmental Consultant

Copied:

Jillian Adams – Jillian.Adams@baywa-re.co.uk;

Dan Walker – Dan.Walker@landuse.co.uk; and

ScotWays – info@scotways.com.