Technical Appendix 6.1: Scoping Response Table

Table 1 - Scoping Response Table

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
General Comments			
Energy Consents Unit (ECU) Scoping 14th September 2023	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Proposed mitigation measures have been presented as a conclusion to each chapter. A consolidated schedule of mitigation has also been provided as Chapter 17 of the EIA Report.	**Chapters 7-16;** and **Chapter 17: Schedule of Commitments.**
The Highland Council (THC) Scoping 14th September 2023	An EIAR must include: – a description of the physical characteristics of the whole development and the full landuse requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e., connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied; – a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; – the risk of accidents, having regard in particular to substances or technologies used; – an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and, – the estimated cumulative impact of the project with other consented or operational developments.	A description of the physical characteristics of the whole development and land use requirements during operational, construction and decommissioning phases has been included within Chapter 3 and other technical chapters as relevant. A site layout plan has also been provided. The risk of accidents, if relevant, have been addressed within the relevant technical chapters. Estimates of expected residues and emissions have been included within relevant chapters where applicable. The cumulative impact of the project with other consented and operational developments has been assessed.	**Chapter 3: Description of the Development.** **Chapters 7-16.**
	A statement is required that outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following: – the design chapter should clearly set out the design evolution of the scheme including constraints to the delivery of that scheme; – the range of technologies that may have been considered – we note that the 'Project Background' statement within the Scoping Report advises that one turbine company has discontinued turbine models as justification for new applications however does not appear to advise that the applicant has attempted to source turbines of approved dimensions from any other source. – locational criteria and economic parameters used in the initial site selection; – options for access; – design and locational options for all elements of the proposed development (including grid connection); and,	The main development alternatives are described within Chapter 2 of the EIA Report. This includes the design evolution of the Proposed Development, range of technologies considered, the site selection process, options for access, design and locational options for the Proposed Development and the environmental effects of different options examined. The grid connection will form a separate application under Section 37 of the Electricity Act. A summary of the Carbon Calculator is included in Chapter 16: Other Environmental Considerations.	**Chapter 2: Site Description and Design Evolution** **Chapter 16: Other Environmental Considerations.**

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	– the environmental effects of the different options examined. The assessment should also highlight sustainable development attributes including, for example, an assessment of carbon emissions / carbon savings.		
	The current Development Plan comprises the: – Fourth National Planning Framework (NPF4) adopted in 2023 – Highland-wide Local Development Plan (HwLDP) adopted 2012 – Inner Moray Firth Local Development Plan (IMFLDP) adopted 2015 – Associated Supplementary Guidance (SG), with particular regard to the Onshore Wind Energy Supplementary Guidance (OWESG) (2016) and Part 2b (2017) ... ...The scope of the EIA should, however, address all the relevant issues covered within NPF4, HwLDP, IMFLDP, IMFpLDP2 and the Council Supplementary Guidance.	Noted – the scope of the EIA addresses all relevant issues in the mentioned policy documents and guidance.	**Chapter 4: Policy Framework; and** **Chapters 7-16.**
Landscape and Visual			
Energy Consents Unit (ECU) Scoping 14 September 2023	Ministers note further viewpoints have been requested by consultees. As the tip height exceeds 150 m, LVIA to include robust Night Time Assessment with agreed viewpoints to consider aviation lighting, and how chosen lighting mitigates the potential effects.	The final viewpoint list takes account of consultation responses and has been agreed with THC and NatureScot. The LVIA includes a robust Night Time Assessment in accordance with best practice guidance (NatureScot 2024).	**Chapter 7: Landscape and Visual Impact Assessment**
The Highland Council (THC)	LVIA should refer to the criteria set out in THC Onshore Wind Energy Supplementary Guidance (OWESG).	These criteria are considered a planning matter and are discussed in the planning statement rather than the LVIA.	**Planning Statement**
	The EIA Report should consider the landscape and visual impact, conforming with the GLVIA3. THC makes a distinction between the two, they require separate assessment and presentation of visual material differently. These images should form part of the EIA Report and not be separate from it.	The LVIA conforms with GLVIA3 and provides two separate sets of visualisations, one in accordance with NatureScot guidance and the other with THC guidance. Both form part of the EIA Report.	**Chapter 7: Landscape and Visual Impact Assessment**
	Photomontages should follow THC Visualisation Standards. Separate hard copy volumes of visualisations to be prepared to THC Standards and NS guidance. THC's volume preferred in A3 ring bound folder. Monochrome for specific viewpoints useful to illustrate wind farms in the view. All existing turbines to be re-rendered even if they appear to be facing the viewer to ensure consistency. The visual impact of the tracks, substations, battery storage and on-site borrow pits to be considered and with own site layout/ elevation plans.	The LVIA takes account of applicable NatureScot and THC guidance. Monochrome images have not been requested by THC. The visual impact of the tracks, substation and on-site borrow pit search areas is considered along with other infrastructure. Operational turbines have not been removed and rendered back into the photomontages. This is because where they are visible, they are seen at considerable distance and are not material to the effect of the Proposed Development on the view. Site layout/elevation plans are included in Figures associated with Chapter 3 of the EIA Report.	**Chapter 7: Landscape and Visual Impact Assessment;**

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	Cumulative study area should be as for LVIA, minimum 45 km. Updated interactive Wind Turbine map to identify other schemes in Study Area. Viewpoints to correspond with those used for existing wind farms in area. Cumulative impact will be a significant material consideration. The applicant to present images in the Panoramic Digital Viewer deployed by THC.	The cumulative study area starts at 60 km and is then reduced to 45 km for the detailed assessment. The cumulative sites included have been agreed with THC, as have the LVIA viewpoints (all viewpoints are assessed in cumulative terms). Panoramic Digital Viewer images have not been requested by THC.	**Chapter 7: Landscape and Visual Impact Assessment**
	Viewpoints to be informed by site survey, mapping and predicted ZTVs to avoid abortive work and delays. Viewpoints requests from Community Councils and any pre-app discussions with community to be taken into account. The Landscape Officer is satisfied with methodology/scope of LVIA, and requests that consideration is given to the following viewpoints: – On the Great Glen Way, near Ladycairn – In the area of the Fodderty Cemetery/A834 – On the A835 in the vicinity of Garbat – On the A832 between Achanalt and Knockban Around Heights of Fodderty/Heights of Keppoch.	Viewpoints have been informed by site visits and include locations suggested by THC, NatureScot, various community councils, Mountaineering Scotland, and people who visited the first round of exhibitions in November 2023. The final viewpoint list has been agreed with THC and NatureScot and includes the suggestions of THC or nearby locations where relevant.	**Chapter 7: Landscape and Visual Impact Assessment**
	LVIA to consider effects on combinations/ interactions of LCTs and features that give rise to local sense of place as well as individual LCTs.	The LVIA considers these interactions, often in the visual assessment where the relationship between LCTs is apparent in views.	**Chapter 7: Landscape and Visual Impact Assessment**
	Some viewpoints to be 'Specific Viewpoints', addressing key and promoted views others to be 'representative viewpoints' showing effects applicable to similar areas, as well as some 'illustrative views' chosen to demonstrate a particular effect. These categories to be confirmed in the visual impact assessment and effects on specific view and general amenity assessed. THC generally prefers the term 'Hours of Darkness' over 'Night-Time' in recognition of how extensive hours of darkness can be in the Highlands. Hours of darkness effects will be visible during the working day for a significant part of the year and sensitivities of receptors must take account.	The purpose of each viewpoint is stated in the assessment. The hours of darkness assessment takes into account the sensitivities of receptors, with reference to best practice guidance.	**Chapter 7: Landscape and Visual Impact Assessment**
	GDLs aspects relating to landscape setting, or relationship to the wider landscape to be considered in the LVIA chapter, in addition to the Archaeology and Cultural Heritage Chapter.	Where relevant, the setting and relationship of Garden and Designed Landscape (GDLs) to the wider landscape is considered in the LVIA.	**Chapter 7: Landscape and Visual Impact Assessment**
	THC notes potential micrositing of viewpoints to avoid intervening screening etc.	Noted.	**Chapter 7: Landscape and Visual Impact Assessment**
	Forestry is not considered a permanent fixture and LVIAs to assume bare earth, along with 'permanent' physical infrastructure.	It is acknowledged that forestry is not a permanent fixture in the landscape. However, it is not considered possible to assess a 'bare earth' scenario for receptors where forestry wholly or partially screens views. This is	**Chapter 7: Landscape and Visual Impact Assessment**

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		because it is not possible to predict what other screening features may lie behind the forestry (e.g. deciduous woodland, which is likely to be retained when coniferous forestry is felled) and the level of visibility and impact of the Proposed Development can therefore not be accurately predicted. Moreover, forestry is generally planted and felled in coupes, ensuring that a whole area of forestry is unlikely to be felled at one time without some areas having been replanted.	
	The purpose of VPs should be stated i.e. landscape, visual impact, cumulative, sequential, or representative, or for assessment of impact on designated sites, communities, or individual properties.	The LVIA states the relevance/representation of each viewpoint.	**Chapter 7: Landscape and Visual Impact Assessment**
	Content with a study area of 45 km; detailed assessment of effects to be undertaken for the whole study area.	A detailed assessment has been carried out for those landscape and visual receptors that have potential for a significant effect to arise, throughout the study area.	**Chapter 7: Landscape and Visual Impact Assessment**
	The LVIA should clearly set out the methodology including: – Definitions of each point on the scale of magnitude of change – Definitions of each point on the scale of sensitivity – The threshold to which the applicant considers a significant effect is reached. The Council consider that Moderate impacts can be significant. A clear matrix approach supported by descriptive text setting out the conclusion of effects	The full LVIA methodology is set out in Appendix 7.1. Moderate effects can be either significant or not significant in the methodology used.	**Technical Appendix 7.1 – LVIA Methodology**
	Assess all paths and long-distance trails, including sequential assessment in relation to existing and consented wind farms.	Effects (including cumulative effects) on views from long-distance trails are considered in the LVIA. The effects on views from core paths are not assessed individually due to the number of such routes, but viewpoints located on core paths are included in the viewpoint list and broad conclusions are drawn as to the level of visibility and effect that the Proposed Development will have on views from core paths.	**Chapter 7: Landscape and Visual Impact Assessment**
	Assess impacts on landscapes designated at a national and local scale, SLAs and WLAs. SLAs to be assessed using SLA citations.	Designated landscapes are considered in the LVIA, and the SLA citations are referenced. WLAs are also considered.	**Chapter 7: Landscape and Visual Impact Assessment**
	Assess impacts of aviation lighting, including on WLAs, SLAs and dark skies.	The assessment of visible turbine lighting is carried out in accordance with best practice guidance (NatureScot 2024).	**Chapter 7: Landscape and Visual Impact Assessment**
	RVAA to be assessed for all properties, settlements, and housing groups within 2 km of turbines in LVIA.	A Residential Visual Amenity Assessment (RVAA) has been undertaken for all properties within 2 km of turbines and is presented in Technical Appendix 7.2.	**Technical Appendix 7.2 – Residential Visual Amenity Assessment**

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	THC request that their four-point scale is used advising any effect to be either strong positive, positive, negative, or strong negative.	A full LVIA methodology is provided in Appendix 7.1. THC's four-point scale does not conform with GLVIA3 and has therefore not been referenced.	**Technical Appendix 7.1 – LVIA Methodology**
NatureScot Scoping Opinion July 2023	Should this proposal significantly affect the qualities of the Rhiddoroch - Beinn Dearg - Ben Wyvis WLA and the mitigation proposed to reduce impacts on this WLA is deemed insufficient, this may lead NatureScot to object. The Applicant should consult NatureScot on the proposed scope of the Wild Land Assessment, including WLA qualities to be assessed and proposed assessment/ viewpoints.	A full assessment of effects on the Rhiddoroch - Beinn Dearg - Ben Wyvis WLA is included in the LVIA. The wild land qualities considered in the assessment and the provision of additional wirelines within the WLA have been agreed with NatureScot.	**Chapter 7: Landscape and Visual Impact Assessment**
	Paragraph 6.3.12 states that night-time visualisations from three viewpoints will be included and that these are agreed with us in advance. It should also be noted that the cumulative effects of lighting will also be required.	Hours of darkness visualisations have been produced for five viewpoints, in agreement with THC and NatureScot. The hours of darkness assessment considers cumulative effects.	**Chapter 7: Landscape and Visual Impact Assessment**
	The Wild Land assessment should set out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of this WLA.	The mitigation of effects on the WLA is described in the Design Statement.	**Design Statement**
	We recommend the EIAR considers the potential for the wind farm to affect people's enjoyment of the Ben Wyvis NNR and thus upon the objectives of NNR designation and its overall integrity. While there is no 'standard' method of assessment for NNRs, NatureScot suggested that it would seem reasonable for an assessment to follow LVIA methods, using visuals taken from key viewpoints within the NNR and that potential impacts to the NNR should be scoped in.	Matters pertaining to NNRs are not relevant to LVIA, and the LVIA is not considered to be an appropriate vehicle for the assessment of the effect of the Proposed Development on people's enjoyment of the Ben Wyvis NNR. The LVIA does include one viewpoint within the NNR (Viewpoint 5) and one on the edge of the NNR (Viewpoint 6), and the assessment of the effects at these viewpojnts provides a description of the effect that the Proposed Development will have on views from these locations within/on the edge of the NNR.	**N/A**
Mountaineering Scotland Scoping Opinion July 2023	Mountaineering Scotland propose that Am Faochagach be used instead of Ben Dearg since both are Munros but the former is closer to the proposal. This list omits any viewpoint in the Fannichs - a very popular range of hills to the west. We suggest the Munro An Coileachan be included to assess cumulative impact with the Lochluichart/Corriemoillie cluster. We request that any new application show how it has addressed the specific reasons for the Carn Gorm refusal in 2014.	As suggested, Am Faochagach (Viewpoint 32) has replaced Ben Dearg in the final viewpoint list, and An Coileachan (Viewpoint 31) has been included in the viewpoint list. The Planning Statement should be referred to for policy matters in relation to previous applications.	**Figures 7.46 and 7.47; and Planning Statement**
Contin Community Council Scoping Opinion	ZTV maps need to include zoomed-in and zoomed-out versions, such that visibility can be assessed in nearby settlements. We ask for the inclusion of a map calculated for hub height, since this indicates substantial visibility.	The ZTVs in the LVIA figures include various scales/sizes of mapping (Figures 7.7a-d and 7.8a-d). Hub height ZTVs are included.	**Figures 7.7a-d and 7.8a-d**
	Viewpoints should be consistent with Tarvie wind farm and all views should include both developments. Viewpoint 6 (Contin) should be selected to be an accessible point in the village giving the clearest view of the proposed development. CCC request that a viewpoint is added for View Rock.	The Proposed Development is at a more advanced stage than Tarvie Wind Farm (scoping stage) and a final viewpoint list has not yet been confirmed for Tarvie. An additional set of wirelines that show Tarvie has been included as Appendix 7.4 to the LVIA.	**Technical Appendix 7.4: Additional Cumulative Wirelines;** **Figure 7.22; and**

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		The LVIA viewpoint in Contin (Viewpoint 23) is located on the footpath of the A835 as it passes through the village and gives a clear, open and easily accessible view of the Proposed Development. A viewpoint at View Rock is included in the LVIA (Viewpoint 7).	**Figure 7.38.**
	It is important the generated views include zoomed-in views, equivalent to that perceived by the eye without moving the head, as well as wider views. We consider the Ben Wyvis massif to be an area of high landscape sensitivity. We would point out that Ben Wyvis is the nearest Munro to the large population centre of Inverness.	The visualisations include a variety of fields of view, including single frame and wider views, in accordance with THC and NatureScot guidance. The sensitivity of the Ben Wyvis massif has been considered in the LVIA.	**Chapter 7: Landscape and Visual Impact Assessment**
	There are a number of wind farms already operating in the area, and proposals for 3 others immediately adjacent. We need a ZTV map that combines all visible tips, both built and currently proposed. Both wide-area and zoomed-in so that we can see the detailed effect around settlements.	The operational and proposed wind farms within a 60 km and 45 km radius of the Proposed Development are shown in Figures 7.14a and b. Cumulative ZTVs that show the Proposed Development in conjunction with each of the operational, consented and application stage cumulative wind farms are included in the LVIA (Figures 7.15a-b).	**Figures 7.14a-b, and 7.15a-b**
	ZTV maps should be calculated for the height of a first floor window; this is what you see when you get up or go to bed – a daily reminder.	ZTVs are calculated at a viewer height of 2 m, in accordance with NatureScot guidance (SNH 2017c)).	**Figures 7.14a-b**
	Given that other electricity infrastructure is an integral part of the policies that might permit this development, the possible Spittal-Beauly link should be scoped-in to these assessments.	The Spittal – Loch Buidhe – Beauly 400kV Connection does not yet have a defined route and it is therefore not possible to include it in the assessment, as agreed with THC.	**N/A**
Ferintosh Community Council Scoping Opinion	The viewpoint from Culbokie needs to be identified and added to the viewpoint list. Viewpoints from other communities also need to be identified and clarified.	Viewpoint 14 is located in Culbokie and is considered to represent visibility that will be gained from the settlement. Viewpoints in other settlements that will gain visibility of the Proposed Development have also been included in the LVIA.	**Chapter 7: Landscape and Visual Impact Assessment**
Ecology			
Ferintosh Community Council 20 July 2023 *Scoping*	Proper environmental study should be conducted assessing the impact of the collective windfarms, existing and proposed projects, and not just individual studies.	Potential effects of the Proposed Development (alone) are considered in **Chapter 8, Sections 8.8 and 8.9**, and cumulatively in **Sections 8.12.**	**Chapter 8: Ecology**
RSPB Scotland 20 July 2023 *Scoping*	New NatureScot guidance (NatureScot, 2023) is now available on development on priority peatland and outlines recommendations for compensation and enhancement in line with Policy 3 of NPF4. This should be taken account in the Habitat Management Plan (HMP). We strongly support the production of an outline HMP, including an indication of size of any areas to be restored. We would recommend consideration of	Measures for compensation and enhancement in line with Policy 3 of NPF4 of priority peatland are detailed in **Chapter 8, Section 8.10.** Enhancement measures to be investigated and adopted are accordingly provided in the ONEMP (**Technical Appendix 8.5**). The ONEMP includes details of the extent of peatland to be enhanced and restored.	**Chapter 8: Ecology; and Technical Appendix 8.5: ONEMP.**

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	actions such as maximising bog restoration to increase biodiversity and climate benefits, away from turbine locations. Any compensatory planting should be comprised of native species and be included within the HMP. The HMP must include a comprehensive monitoring programme for any habitat improvements.	Details of proposed native riparian tree planting is included in the ONEMP. The ONEMP includes details of a monitoring programme for proposed habitat improvement measures.	
NatureScot 21 July 2023 *Scoping*	Ben Wyvis SAC (SSSI) - there is potential for upland habitats (e.g., blanket bog) to be affected by deer that might be displaced from the development area. Bog restoration work is in progress within this nearby protected area. NatureScot would welcome that this issue is duly considered within the EIA Report and assessed within a shadow HRA.	The potential effects of deer displaced from the site as a result of the Porposed Development affecting Ben Wyvis SSSI/SAC have been scoped in (see Table 8.10 in **Chapter 8**) An assessment of potential effects of deer displaced from the site as a result of the Proposed Development affecting Ben Wyvis SAC are included in **Chapter 8, Section 8.15.**	**Chapter 8: Ecology**
	Ben Wyvis National Nature Reserve (NNR) - NNR status is applied to land and water of acknowledged conservation significance, with nature being managed to agreed high standards. NNRs are managed primarily for nature and for the public to enjoy them. For Ben Wyvis NNR, this includes visitors being exposed to a special upland experience and that also includes enjoyment and appreciation of impressive landscapes. NatureScot recommends the EIA Report considers the potential for the proposed wind farm to affect people's enjoyment of this NNR and thus upon the objectives of NNR designation and its overall integrity. NatureScot suggest an assessment follows Landscape and Visual Impact Assessment (LVIA) methods. For the avoidance of doubt, potential impacts to this NNR should be scoped in.	Ben Wyvis NNR is located 1.35 km north-east of the site, and although it does not have specific qualifying features, a mosaic of upland habitats are noted to be present, and mountain hare are listed as possible mammals to see. Effects on habitats and mountain hare are considered within **Chapter 8: Table 8.10.** Potential for the Proposed Development to affect people's enjoyment of this NNR, in terms of landscape and visual impacts, are considered in **Chapter 7.**	**Chapter 8: Ecology; and Chapter 7: Landscape and Visual Impact Assessment**
	NatureScot welcomes that an outline Habitat Management Plan (HMP) is going to be provided to help offset losses & impacts to peatland habitat from the development. Please note that NatureScot advise any area of peatland restoration should be at least 10x the scale of that impacted by the development.	An ONEMP is included as **Appendix 8.5.** Unavoidable impacts will be compensated. A proportion of the priority peatland on-site is likely to be required to be restored, to achieve a significant level of enhancement, and the specific amount will accord to the NatureScot guidance applicable at the time of consent (if the Proposed Development is consented).	**Technical Appendix 8.5: ONEMP**
	NatureScot welcomes that the developer has identified the Strathpeffer Wildcat Priority Area, reinforcing the requirement for dedicated survey work of this species in context to the wind farm and any associated access track works or upgrades.	Noted, baseline terrestrial mammal surveys included searching for the presence or likely presence of Scottish wildcat within the site (including recording any potential den sites), which included the proposed wind turbine locations and associated access tracks.	**Chapter 8: Ecology**
	NatureScot recommends that protected species surveys should be undertaken on pine marten, red squirrel and mountain hare.	Baseline terrestrial mammal surveys included searching for the presence or likely presence of pine marten (*Martes martes*) and red squirrel (*Sciurus vulgaris*). Baseline extended Phase 1 habitat survey also included searching for the presence or likely presence of these species, including mountain hare. Mountain hare (*Lepus*	**Chapter 8: Ecology**

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		timidus) droppings and pine marten scat were recorded within the site.	
	Question *addressed to NatureScot:* Do consultees agree with those ecology features which have been scoped out from the EIA? *NatureScot Response:* NatureScot recommend that the potential effects for deer to be displaced from the development boundary affecting Ben Wyvis SSSI / SAC should be scoped in. For Ben Wyvis SAC, assessment should be provided within the shadow HRA. Perhaps, the only exception where operational effects on mammals should be scoped-in, would be if a wildcat breeding den was found in proximity of wind farm infrastructure.	The potential effects of deer displaced from the site as a result of the Proposed Development affecting Ben Wyvis SSSI/SAC have been scoped in (see **Chapter 8: Table 8.10)**. An assessment of potential effects on deer displaced from the site as a result of the Proposed Development affecting Ben Wyvis SAC are included in **Chapter 8: Section 8.15.** Noted, no evidence of Scottish wildcat was recorded (including no potential den sites) during the baseline surveys, as such, Scottish wildcat have been scoped out.	**Chapter 8: Ecology**
The Highland Council 25 August 2023 *Scoping*	Final route selection should avoid areas of Carbon Rich Soils, Deep Peat and Priority Peatland Habitat (CPP). The developer should undertake a specific peat assessment to inform the siting, design, or other mitigation in order to at least substantially overcome significant effects on CPP.	The presence of CPP has been regarded in design evolution. An assessment of the potential impacts upon CPP is included in **Chapter 10.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
	The EIA Report should provide a baseline survey of the animals (mammals, reptiles, amphibians, etc.) interest on-site. It needs to be categorically established what species are present on the site, and where, before a future application is submitted.	Surveys for terrestrial mammals, bats and fisheries interest on-site have been undertaken, see **Chapter 8: Sections 8.5** and **8.6** for methodologies and results, respectively. The data search with Highland Biological Recording Group (HBRG) returned records of common toad, palmate newt, common frog, slow-worm, adder and common lizard from 2 km of the site. Common frog, palmate newt and common lizard were also recorded anecdotally within the site during the habitat survey. However, as per NatureScot guidance, there are some species that with standard mitigation are unlikely to experience significant effects as a result of the development of onshore wind farms (including amphibians), and as such, do not require surveys to inform an EIA. Standard mitigation, as detailed in **Chapter 8: Section 8.7**, to include the implementation of good practice construction measures, pollution prevention controls and the presence of an ECoW and licencing requirements (where applicable) (to be secured via the Outline CEMP (OCEMP), see **Appendix 3.1**), are considered appropriate to avoid any potentially significant adverse effects upon reptiles and amphibians. As such, baseline surveys for these species have not been undertaken. These species would also benefit from the habitat enhancement measures to be adopted as part of the	**Technical Appendix 3.1: Outline Construction Environmental Management Plan;** **Chapter 8: Ecology;** **Technical Appendix 8.5: ONEMP**

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		Proposed Development (see **Technical Appendix 8.5: ONEMP).**	
	The EIA Report should provide an account of the habitats present on the site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans.	Details of habitats present within the site are included in **Chapter 8: Section 8.6,** and this also identifies any rare and threatened habitats, and those protected by European or UK legislation, or identified on the SBL. Details of habitats that may be directly or indirectly impacted by the Proposed Development are detailed in **Chapter 8: Section 8.9.**	**Chapter 8: Ecology**
	Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide.	Details of proposed habitat mitigation measures in the context of biodiversity conservation are detailed within **Chapter 8 Section 8.10.** Details of proposed habitat enhancement measures in the context of biodiversity conservation are detailed within **Technical Appendix 8.5 ONEMP.** Inherent risk of peat slide is assessed within **Chapter 10 and Technical Appendix 10.1: Peat Landslide Hazard Risk Assessment (PLHRA).**	**Chapter 8: Ecology; Technical Appendix 8.5: ONEMP; and Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
	Details of any habitat enhancement programmes (such as native-tree planting, stock exclusion, etc.) for the proposed site should be provided. It is expected that the EIA Report will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.	Details of proposed habitat enhancement programmes are detailed within **Chapter 8: Section 8.10** and **Technical Appendix 8.5.** How measures to be adopted benefit BAPs are addressed in the **Technical Appendix 8.5**.	**Chapter 8: Ecology; Technical Appendix 8.5: ONEMP**
	The Highland Council expect an up-to-date National Vegetation Classification (NVC) survey and a commitment to undertake peatland restoration on an area of increased size to that of the application site. The EIA Report should provide details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site.	An NVC survey of the site was undertaken in August 2023, which is within the most recently available two-year survey window prior to submission, as per NatureScot guidance (2024). A commitment to undertake peatland restoration is detailed within **Chapter 8: Section 8.10** and **Technical Appendix 8.5.** Details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site is included in **Chapter 8: Section 8.9.**	**Chapter 8: Ecology; Technical Appendix 8.5: ONEMP**
	The EIA Report should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the Proposed Development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant.	The likely impacts on the nature conservation interests of designated sites with ecological qualifying interest are addressed in **Chapter 8** (see **Table 8.10** and **Section 8.9**). Standard mitigation measures to be implemented are detailed in **Chapter 8: Section 8.7,** and additional mitigation measures to be implemented are detailed in **Chapter 8: Section 8.15.**	**Chapter 8: Ecology**

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests.	Potential impacts of the Proposed Development on deer have been considered in **Chapter 8**; measures outlined within **Section 8.7**, to include pre-construction surveys and having an ECoW on-site at appropriate stages of the Proposed Development, would ensure the welfare of deer through construction. Potential impacts on habitats within Ben Wyvis SAC/SSSI resulting from deer displacement are considered within **Chapter 8: Section 8.9** and **8.15** (SAC only).	**Chapter 8: Ecology**
	The EIA Report needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk/incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIA Report should evidence consultation input from the local fishery board(s) where relevant.	The aquatic interest within local watercourses have been addressed through a fish habitat survey of all watercourses on and within 100 m of the site (see **Chapter 8: Section 8.5**). Potential impacts to aquatic interests within local watercourses, including downstream, are considered within **Chapter 8: Table 8.10.** Design measures include a minimum 50 m buffer around all mapped watercourses for turbine hardstanding and sensitive design of proposed watercourse crossings. It is considered that embedded mitigation and good practice to be implemented during construction and operational phases, will prevent significant impacts on aquatic interests of local watercourses, including those downstream. A Fish Monitoring Plan (FMP), including pre-, during- and post-construction fish monitoring would be produced (see **Chapter 8: Section 8.7**). Cromarty Firth Fishery Board and Fisheries Management Scotland were consulted during the scoping stage, however did not provide a response (see **Chapter 6**).	**Chapter 8: Ecology;** **Chapter 6: Scoping and Consultation**
	The EIA Report should include a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers, these habitats are easily damaged by insensitive drainage.	The NVC survey (see **Technical Appendix 8.1 and Figure 8.3**) identified habitats which were potentially GWDTE and, an assessment of the potential impacts upon these habitats is included in **Chapter 10.**	**Technical Appendix 8.1: Habitats and Vegetation;** **Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
	A draft or outline HMP and Species Protection Plan (SPP) should be produced as part of the EIA Report, including any proposals for mitigation and enhancement in relation to important habitats and species. Any compensatory planting plans should be carefully considered and included in the HMP. The HMP should include a comprehensive monitoring programme for all habitat improvements.	Details of proposed mitigation in relation to important habitats are detailed in **Chapter 8: Section 8.10**. An ONEMP is included as **Technical Appendix 8.5,** which includes details of proposals for enhancement in relation to important habitats and species. The ONEMP includes details of a monitoring programme for proposed habitat improvement measures, as well as measures including broad-leaved riparian tree planting.	**Technical Appendix 3.1: Outline Construction Environmental Management Plan;** **Chapter 8: Ecology;** **Technical Appendix 8.5: ONEMP; and**

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
		The CEMP would include SPPs post consent, which would be secured through a suitably worded planning condition. Requirements for compensatory planting are considered in **Chapter 3: Description of the Development.**	**Chapter 3: Description of the Development.**
	Non-wind-farm proposals are scoped out of these assessments. Given that other electricity infrastructure is an integral part of the policies that might permit this development, the possible Spittal-Beauly link should be scoped-in to these assessments.	The approach to scoping was set out in scoping, which did not include the possible Spittal-Beauly link (located approximately 1.5 km south of the Proposed Development); we consider NatureScot to have been satisfied with approach to scoping, given there was no response on the contrary. As such, the possible Spittal-Beauly link has not been considered at scoping. It was also agreed with THC that the proposed SSEN 400kV OHL between Spittal and Beauly will not be included in the cumulative assessment as the route has not yet been finalised.	**Chapter 6: Scoping and Consultation**
Ornithology			
The Highland Council (THC) 25 August 2023 Scoping	Presence of Schedule 1 species and qualifying species of SPAs and other listed bird species of designated areas must be included and considered as part of the application process. Assessment of impacts to birds through collision, disturbance, and displacement from foraging, breeding and/or roosting habitat for the Proposed Development (and cumulatively) will be required. The EIA Report should be clear on the survey methods and any deviations from guidance on ornithology matters.	These species have been considered in **Chapter 9** (see **Sections 9.8** and **9.9**). Potential effects are considered in **Chapter 9: Sections 9.8** and **9.9**, and **Section 9.14** for cumulative assessment. Detail of the survey methods is provided in **Technical Appendix 9.1** and are summarised in **Chapter 9: Section 9.5**.	**Chapter 9: Ornithology; and Technical Appendix 9.1: Ornithology Methodology and Results.**
NatureScot 21 July 2023 *Scoping*	Potential effects on the Glen Affric to Strathconon SPA, for which breeding golden eagle is a qualifying species, will need considered. This should consider the SPA's 'Conservation Objectives' especially with regards to 'population'. This will include an HRA being required to consider these impacts from the Proposed Development and cumulatively. Welcome that Cromarty Firth SPA and Inner Moray Firth SPA are to be scoped into the EIA process, with respect to (non-breeding) greylag goose. Collision risk is the key consideration. The greylag goose number reported in the SPA citations should be used in the assessment, with respect to a shadow HRA. Effects on the Ben Wyvis SPA (and its qualifying species, breeding dotterel) should be scoped in to assessment, so it is clear that such effects have been fully considered. Effects on the Ben Wyvis NNR should be considered in the assessment.	Potential effects on the SPA are considered in **Chapter 9: Sections 9.8**, **9.9** and **9.12**. An information to inform HRA is provided in **Section 9.14**. Potential effects on the SPAs are considered in **Chapter 9: Section 9.8**. An information to inform HRA is provided in **Section 9.14**. Noted, and population numbers from SPA citations have been considered, see **Chapter 9: Section 9.14**. Potential effects on the SPA is considered in **Chapter 9: Section 9.8**. An information to inform HRA is provided in **Section 9.14**. Effects on the NNR with respect to ornithological interest of the NNR are provided in **Chapter 9: Section 9.8**. Both species are considered in **Chapter 9: Section 9.8**.	**Chapter 9: Ornithology**

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	Slavonian grebe and capercaillie should be duly considered in the assessment.		
Ferintosh Community Council 20 July 2023 *Scoping*	Proper environmental study should be conducted at the impact of the collective windfarms, existing and proposed projects, and not just individual studies.	Potential effects of the Proposed Development (alone) are considered in **Chapter 9: Sections 9.8**, **9.9** and **9.14**, and cumulatively in **Sections 9.12** and **9.14**.	**Chapter 9: Ornithology**
RSPB Scotland 20 July 2023 *Scoping*	Generally satisfied with the content of the scoping report and the proposed scope of EIA. Effects on golden eagle in terms of potential loss of foraging habitat, displacement, and collision risk should be considered. Welcome the use of the GET model. Important to ascertain distances of operations to golden eagle nest sites (and line-of-sight) so that appropirate constraints can be adopted to prevent disturbance. Recommend the HRSG are contacted for the latest information on golden eagle, including location of nest sites.	Noted. These potential effects on golden eagle have been considered in **Chapter 9: Sections 9.8** and **9.9**. Noted. The GET model is provided in **Confidential Technical Appendix 9.4**. Such potential effects to nesting eagles has been considered (see **Chapter 9: Section 9.9**). Such information has been gathered from the HRSG (see **Confidential Technical Appendix 9.2**).	**Chapter 9: Ornithology; Confidential Technical Appendix 9.2; and Confidential Technical Appendix 9.4.**
	The Ben Wyvis SPA should be scoped in to the assessment. Assessment should make it clear whether any suitable breeding habitat for dotterel on the site. Potential for dotterel to traverse the site should also be considered. Welcome the inclusion of the Cromarty Firth SPA and Ramsar site, and Inner Moray Firth SPA and Ramsar site within the assessment, with regards to non-breeding greylag goose. Effort should be made to minimise collision risk to red kite (*Milvus milvus*), for example by turbines avoiding main areas of red kite activity. EIA must include an assessment of the disturbance, displacement and collision risk for black grouse. Potential for black grouse to collide with the turbine base should also be considered. Black grouse are sensitive to disturbance during lekking, and the Proposed Development should be designed to avoid potential displacement ensuring a 750 m buffer is in place around leks. Works should also avoid disturbance during the lekking season (March to May, inclusive). Habitat enhancement measures should be considered to benefit black grouse and could include promotion of heather and other dwarf shrubs, low density native woodland planting by commercial forestry and bog restoration.	Potential effects on the Ben Wyvis SPA (breeding dotterel) is considered in **Chapter 9: Sections 9.8** and **9.14**. Potential effects on the SPAs and Ramsar sites are considered in **Chapter 9: Section 9.8**. An information to inform HRA is provided in **Chapter 9: Section 9.14**. Noted. Those areas of the site with the highest red kite activity has been considered during design evolution (see **Chapter 9: Sections 9.7** and **9.9**). Effects on black grouse are considered in **Chapter 9: Sections 9.8** and **9.9**. This mitigation measure is being adopted as confirmed in **Chapter 9: Section 9.10**. Enhancement measures to be adopted are provided in **Section 9.10**, and are discussed within the ONEMP (see **Technical Appendix 8.5**). These include measures aimed to benefit black grouse.	**Chapter 9: Ornithology; Technical Appendix 8.5: ONEMP**
	Content, in general, with the range, survey areas/buffers and approach to bird surveys undertaken, it would be prudent to include dotterel in the surveys. Raptor and eagle surveys were carried out April to August 2020 and 2021, even though NatureScot (SNH, 2017) states the eagle surveys should commence from February.	Noted. Dotterel was included as a target species during the two years of surveys. Raptor surveys were undertaken between February and August 2021 (and April to August 2020), and thus Year 2 at least captured the early eagle breeding season. Note, VP flight activity surveys would have captured eagle	**Chapter 9: Ornithology;** **Technical Appendix 9.1: Ornithology Methodology and Results;** **Technical Appendix 9.3: Collision Risk Model Analysis;**

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	Information should be provided in the EIA Report to demonstrate that the survey data is adequate, robust and accurate, and should included: full information of VP work undertaken, including dates, times and weather conditions, maps showing VP locations and visible viewsheds, maps showing any goose, swan, wader, grouse, crossbill and raptor breeding, foraging and roosting areas, worked examples of CRM calculations, and raw data in order for independent verification of CRM results.	activity in February and March 2020, and the desk study carried out provided recent raptor (including eagle) records. As such, a true reflection of the eagle activity on, and adjacent to, the site has determined. Information on survey methods and conditions are provided in **Technical Appendix 9.1**. Study areas used during surveys are depicted in **Figures 9.2** and **9.3**. CRM models undertaken, including the worked examples are provided in **Technical Appendix 9.3.**	
	EIA Report should consider all aspects of the Proposed Development including turbines, borrow pits, access roads, substation and storage compounds, etc. And at all phases including site selection, design, construction, operation and maintenance. Disturbance, displacement, loss of suitable habitat (breeding, wintering and foraging) and collision risk should be assessed for all scoped in species, both during construction and operation, for all aspects of the Proposed Development. The potential barrier effects of the Proposed Development should be addressed in the EIA, particularly with regards to raptors and geese. The turbines should be located within the VP visible viewsheds. The turbine which is located by VP1 (based on a previous design iteration) should be moved to avoid the surveyor's presence potentially affecting bird behaviour.	All aspects of the Proposed Development have been considered in the assessment and at all suggested phases (see **Chapter 9: Section 9.9**). These potential effects have been assessed for those scoped-in species (see **Chapter 9: Section 9.9**). The potential for barrier effects are considered in **Chapter 9: Sections 9.8** and **9.9**. The turbines are located within the VP visible viewsheds, as shown in **Figure 9.2**. The nearest turbine has been accordingly moved away from VP1 (see **Figure 9.2**), in the final layout for the Proposed Development.	**Chapter 9: Ornithology**
	Although welcomed the use of GET model, this should not take precedence over observational data. If significant numbers of collisions are predicted, then population models are likely to be required, to provide Counterfactual of Population Size (CPS) outputs. Cumulative impacts on species should be considered across both NHZ7 and NHZ21, and in relation to any designated site with connectivity to the site, including SPAs.	Noted. The results of the GET model have been considered, as well as observational field survey data (and desk study records), in this assessment (see **Chapter 9: Section 9.9**). Significant numbers of collisions are not predicted, and CPS is accordingly not considered. Cumulative impacts on species has been considered at the NHZ7 level, and SPA level, for relevant species. This approach was recommended by THC, and has been followed (see **Chapter 9: Sections 9.9** and **9.14**), and was the approach set out at scoping (so consider NatureScot to have been satisfied with approach too, given there was no response on the contrary). Impacts are not assessed at the NHZ21 population level. NHZ21 is greater than 6 km from the site and thus is on the upper foraging limit of target species including golden eagle and red kite. The documented NHZ21 golden eagle population is reported as '0' so it is considered	**Chapter 9: Ornithology**

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		inappropriate to consider effects also on the NHZ21 population, given the apparent lack of eagles in that NHZ. The red kite population in NHZ21 (50 pairs) is notably higher than within NHZ7 (nine pairs), so assessing impacts against the NHZ7 population (which is where the site is located) is considered most appropriate and provides a worst-case scenario.	
	In addition to wind farm developments, in combination effects of other relevant projects like overhead power lines and new woodland planting should be considered, and grid connections to wind farms like Lochluichart Wind Farm II. Strongly support the production of an outline Habitat Management Plan (HMP) and Breeding Bird Protection Plan (BBPP). Encourage measures to benefit black grouse, away from turbines. The HMP must include a monitoring programme for any habitat improvements, breeding birds on the site, and SPA species, including golden eagle. The HMP (or other document) should include a protocol for reporting collisions to NatureScot	Scoping (including consultation with NatureScot) did not reveal any specific non-wind farm developments that are required to be considered, so cumulative assessment is limited to other relevant wind farm developments (see **Chapter 9: Section 9.12**). An ONEMP which provides habitat enhancement measures to be adopted is provided in **Technical Appendix 8.5**. This includes measures aimed to benefit black grouse. The ONEMP summarises the monitoring to be undertaken if the Proposed Development is consented (see **Technical Appendix 8.5**). The summary of ornithological monitoring in the ONEMP includes a protocol for reporting collisions to NatureScot	**Chapter 9: Ornithology;** **Technical Appendix 8.5: ONEMP**
Geology, Hydrology, Hydrogeology and Peat			
Energy Consents Unit (ECU) Scoping 14 September 2023	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. The Scottish Ministers request that the Company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquiries to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	Refer to Scottish Water response below. No further consultation was required with Scottish Water to complete the assessment.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
	The Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	Potential impacts to private water supplies are discussed in full in **Technical Appendix 10.4** and summarised in **Chapter 10**. Private water supply sources have been confirmed by site investigation and have informed this assessment.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; and** **Technical Appendix 10.4**
	The Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment ("PLHRA"), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second	A comprehensive programme of peat depth probing and condition assessment has been completed. Potential impacts on peat and proposed mitigation measures are summarised in **Chapter 10** and discussed in full in **Technical Appendix 10.1** and **Technical Appendix 10.2.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ;** **Technical Appendix 10.1; and** **Technical Appendix 10.2.**

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	Edition), published at Proposed electricity generation developments: peat landslide hazard best practice guide - gov.scot (www.gov.scot), should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.		
	Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	A borrow pit assessment is presented in **Technical Appendix 3.2.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat; and Technical Appendix 3.2.**
The Highland Council (THC) Scoping 25 August 2023	The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features including bog pools surrounding the proposed infrastructure, and sensitive receptors such as water supplies, need to be assessed and it demonstrated will not be degraded by site drainage and excavations. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall that will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. The applicant is strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), however it is likely that a map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment, and details of any related CAR applications will be required to be included with the EIAR –SEPA will identify whether a CAR license is necessary and the extent of information required they will require to assess any license application.	**Chapter 10** assesses the potential effects of the Proposed Development on the water environment. Required mitigation measures and best practice that would be adopted are also presented in the chapter.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
	If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be	A schedule of watercourse crossings is included in **Technical Appendix 10.3** which includes photographs and dimensions of the proposed watercourse crossings.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat; and Technical Appendix 10.3**

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	designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.		
	The Council's Flood Risk Management Team had no comments to make at this stage. However, there are a number of watercourses on the site therefore the following applies: – A minimum of a 50 m buffer of all watercourses / bodies and turbines/crane hardstandings, which should be shown on a suitably scaled drawing; – All tracks should be kept a minimum 10 m away from any waterbody except water crossings; – Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; – Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; – Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change; – Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and, – The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment SG.	It is confirmed that a 50 m buffer to all watercourses / water bodies has been applied and is shown on **Figure 10.1b-c.** It is confirmed that watercourse crossings would be sized to pass the 1 in 200 year flood event plus an allowance for climate change. Principles, design standards and best practice measures for the management and control of drainage that would be adopted by the Principal Contractor are included within **Chapter 10**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat; and Figure 10.1.**
	The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	Good practice regarding any future water abstractions is provided in **Section 10.7** of **Chapter 10.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**

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	The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. This information should be in the form of a map and assessment of impacts upon groundwater abstractions and buffers. Highland Council has some information on known supplies, but it is not definitive. An on-site survey will be required.	Noted. The fieldwork completed as part of this assessment included a survey of private water supplies, details of which are included in **Technical Appendix 10.4** and summarised in **Chapter 10**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat; and Technical Appendix 10.4**
	The EIAR must consider the risks of engineering instability relating to presence to peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.	Potential impacts on peat and proposed mitigation measures are summarised in **Chapter 10** and discussed in full in **Technical Appendix 10.1** and **Technical Appendix 10.2.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; Technical Appendix 10.1; and Technical Appendix 10.2**
	As previously noted, the EIAR should include a full assessment on the impact of the development on peat. Policy 55 Peat and Soils, of the Highland Wide LDP, states that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils. As such, the site-wide peat depth survey as proposed in the Scoping Report is welcomed in order to ensure that the final infrastructure design avoids deep peat over 50cm and any sensitive habitats. The mitigation hierarchy must be followed, with impacts avoided and minimised where possible. SEPA can provide detailed advice on methodology for peat probing and the peat assessment. The peat depth survey should be presented as a table detailing re-use proposals.	The results of the site-specific peat depth probing are presented in **Technical Appendix 10.1** and **Technical Appendix 10.2** and summarised in **Chapter 10**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; Technical Appendix 10.1; and Technical Appendix 10.2**
	Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.	Carbon balance calculations are presented in **Chapter 16 – Other Environmental Considerations**.	**Chapter 16 – Other Environmental Considerations.**
	The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these	A borrow pit assessment is presented in **Technical Appendix 3.2**.	**Technical Appendix 3.2.**

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	borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile, Site Management Plan and pollution prevention measures. Borrow pits should be located in an area demonstrating the least environmental impact, while any aggregate sourced from offsite should not impact on the chemistry of the existing groundwater and must be of a high enough quality not to cause siltation to waterbodies or wetlands. Including this information can avoid the need for further applications.		
NatureScot Scoping 21 July 2023	Our Peatland Guidance has been updated to reflect NPF4. Therefore, please look through this to gauge what needs to be provided within the EIA Report to help gauge 'condition' & 'quality' of peatland habitats that may be affected, see: https://www.nature.scot/general-pre-application-and-scoping-advice-onshore-wind-farms. We welcome that an outline HMP is going to be provided to help offset losses & impacts to peatland habitat from the development. Please note that we advise any area of peatland restoration should be at least 10x the scale of that impacted by the development. Our reasoning for this is outlined within our updated guidance.	Noted. An ONEMP is presented as **Technical Appendix 8.5**.	**Technical Appendix 8.5: ONEMP.**
Scottish Environmental Protection Agency (SEPA) Scoping Response 26 July 2023	To avoid delay and potential objection the EIA submission must contain a scaled plan of sensitivities, for example peat, GWDTE, proximity to watercourses, overlain with proposed development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, and then reduce then mitigate significant impacts on the environment. We consider that the issues covered in Appendix 1 below must be addressed to our satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted.	Refer to **Figures 10.1** to **10.8** and **Technical Appendix 10.1** and **Technical Appendix 10.2**.	**Figures 10.1 to 10.8 and Technical Appendix 10.1 and Technical Appendix 10.2.**
	Significant parts of the site are on peat and carbon rich soils, in accordance with NPF4 Policy 5 (Soils) the Environmental Report will need to be supported by a comprehensive site specific Peat Management Plan that is underpinned by the mitigation hierarchy and the principle of avoidance. Several of the proposed turbine locations look problematic in this regard, most notably Turbine 5.	Noted. Details of the site description and design evolution are presented in **Chapter 2**. Potential impacts on peat and proposed mitigation measures are summarised in Chapter 10 and discussed in full in **Technical Appendix 10.1** and **Technical Appendix 10.2.**	**Chapter 2: Site Description and Design Evolution; Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; Technical Appendix 10.1; and Technical Appendix 10.2**

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	The peat probing data shown on Figure 9.2 (Peat Probing Plan) dates from 2013 is thought to be from the previous Carn Gorm Wind Farm proposal that was refused permission on appeal in 2015 (ref: PPA-270-2177). The only information provided to date relating to the proposed layout of this proposal relates to the location of the turbines. Once there is greater certainty as to the proposed location of all other aspects (access tracks, crane pads, hard standing areas, borrow pits, etc.) supplementary peat probing will need to be undertaken at an appropriate resolution to inform the site layout.	It is confirmed that additional peat probing has been undertaken as part of this assessment, details of which are included **in Technical Appendix 10.1** and **Technical Appendix 10.2** and summarised in Section 10.6 of **Chapter 10**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; Technical Appendix 10.1; and Technical Appendix 10.2**
	Given the presence of an existing access track from the A835 we would wish to see this used. There are also tracks on-site that should be utilised, notably for Turbines 2, 4, 7 and 10.	Noted. It is confirmed that where technically feasible, the existing track will be used.	
	Based on the information provided at this stage it seems unlikely that any development will take place within 250 m of a groundwater supply source; if this is the case it would be helpful if the EIA Report provides evidence to confirm this.	Details of private water supplies are summarised in **Chapter 10** and discussed in full in **Technical Appendix 10.4**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; and Technical Appendix 10.4**
	Provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses we do not foresee from current information a need for detailed information on flood risk.	It is confirmed that watercourse crossings would be sized to pass the 1 in 200 year flood event plus an allowance for climate change. A screening assessment of flood risk is included in **Section 10.6** of **Chapter 10.**	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
Contin Community Council Scoping Not dated.	There needs to be an awareness of the possible effects of introducing Ca-rich highly alkaline water associated with concrete, into a Ca-poor acidic environment. Given the known occurrence of sub-economic pegmatite bodies in the Carn Gorm area, there is the possibility that the proposed works will discover other pegmatites that may be of economic interest. The development should not sterilise these.	Noted. At detailed design stage of the wind farm, the turbine foundations will be designed with the ground conditions in mind to ensure that the concrete used will not degrade and therefore leach into the soil / water environment.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat**
RSPB Scotland Scoping 20 July 2023	The site contains significant areas of Class 1 and 2 deep peat, according to the NatureScot Carbon and Peatland Map 2016. Class 5 peat is also recorded over the site. Policy 55 Peat and Soils, of the Highland Wide LDP, state that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils.	The results of the site-specific peat depth probing and potential effects on peat are presented in **Technical Appendix 10.1** and **Technical Appendix 10.2** and summarised in **Chapter 10**.	**Chapter 10: Geology, Hydrology, Hydrogeology and Peat ; Technical Appendix 10.1: Peat Landslide Hazard Risk Assessment; Technical Appendix 10.2: Peat Management Plan; and**

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	Results of the site-wide peat-depth survey should inform the final infrastructure design and ensure it avoids deep peat (over 50cm deep) and any sensitive habitats. The mitigation hierarchy must be followed, with impacts avoided and minimised where possible. New NatureScot guidance is now available on development on priority peatland and outlines recommendations for compensation and enhancement in line with Policy 3 of NPF4. This should be taken account in the Habitat Management Plan, as discussed below.	An Outline NEMP is presented as **Technical Appendix 8.5.**	**Technical Appendix 8.5: ONEMP.**
Scottish Water Scoping 10 July 2023	Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced	Noted.	
	A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.	Noted.	
	For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	Noted.	
Archaeology and Cultural Heritage			
The Highland Council (THC) Scoping 25th August 2023	The EIAR needs to identify all designated sites which may be effected by the development, including those susceptible to setting effects. Where significant impacts are likely, appropriate visualisations such as photomontages and wireframes illustrating views both from the asset toward the development and toward the asset with the development in the background	A blanket walkover survey was conducted to survey all known and potentially unrecorded remains, as well as the proposed turbine locations. Visualisations have been produced for all of the assets scoped into further setting assessments in agreement with Historic Environment Scotland (HES). All	**Chapter 11 – Archaeology and Cultural Heritage**

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	would be helpful. Visualisations should be produced in accordance with the Highland Council's Visualisation standards for Wind Energy Developments. The Council's Archaeologist advises that they are largely satisfied with the information presented in the scoping report. A blanket walkover, rather than a targeted survey, should be carried out to survey any potentially unrecorded remains.	visualisation locations have been agreed with HES, and demonstrate key views from the assets or their approaches, to assess setting impacts.	
Historic Environment Scotland (HES) Scoping 29th August 2023	Largely content with the proposed approach for the assessment of potential cumulative impact, but recommended that the type of development to be considered should not be limited to wind farm projects at this stage. Highlighted that the Spittal – Loch Buidhe – Beauly 400kV Overhead Line should be considered in the cumulative impact assessment. Disagrees with the assessment of setting impacts being considered an indirect impact, and advises that setting impacts are direct impacts as a result from the proposal causing change within the setting of the heritage asset that affects its cultural significance. Considers that a 10 km study area is not sufficient and that a 20 km study area from the proposed turbines is recommended. It is expected that the setting assessments outline the basis of judgements to avoid underestimating of impacts, and does not only use the Level of Effect Matrix. Reiterates that mitigation for setting can include alteration of the proposed turbine layout, reducing turbine height and changing the colour of turbines. Detailed assessment may demonstrate that deletion of turbines may be required. New strategy for Scotland's historic environment "Our Past, Our Future" June 2023 has replaced "Our Place in Time" 2014. "Cultural Heritage" is quoted in The Burra Charter 2013 rather than HEPS 2019. Disagrees with scoping out of Little Garve, bridge over Black Water (SM2720) from further assessment due to the visibility of turbines from the bridge. Requests to assess one asset each from two clusters of scheduled monuments outwith the 10 km study buffer, between Conon Bridge and Muir of Ord and along the Cromarty Firth. Disagree with scoping out Castle Leod (LB7826) and associated Garden and Designed Landscape (GDL0094).	Cumulative effects have included wind farms and other proposals which are of a similar size (EIA projects). Consideration was given to the proposed Spittal – Loch Buidhe – Beauly 400kV Overhead Line, however as it is still in the scoping stage its potential for cumulative effects cannot be ascertained and therefore it has been excluded from consideration in the cumulative assessment. Effects within the EIA have been assessed as direct, indirect, setting and cumulative effects. The study area for the assessment of setting effects is not considered to be required to extend beyond 10 km. While we agree that assets outwith 10 km may have visibility of the turbines, these assets setting would not extend beyond 10 km toward the site, or to views of the site (see Technical Appendix 11.2). Little Garve, bridge over Black Water (SM2720) and Castle Leod (GDL0094) have been scoped into further assessment. The Castle Leod (LB7826) was assessed as part of the GDL. The reasoning for the clusters of assets to be assessed was requested, as the assets shared no associations or aspects of setting, and therefore scoping out one asset would not scope out the rest of them. Comments regarding the methodology of the EIA assessments, including the Level of Effect Matrix, suitable mitigation measures, shall be included Agree to produce wirelines and photomontages where appropriate to facilitate the assessment of potential impacts of the proposed turbines upon their setting.	**Chapter 11 – Archaeology and Cultural Heritage;** **Technical Appendix 11.2: Designated Cultural Heritage Settings Appraisal**
Noise and Vibration			
The Highland Council (THC) 22 September 2023	THC email dated 15 February 2024 advises of Tarvie Wind Farm which is in Scoping at this time, and agreed on the other points raised in the consultation letter.	Tarvie Wind Farm has been considered in the assessment. Section 12.12 of Chapter 12 discusses this further.	**Chapter 12: Noise and Vibration**

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		The assessment summarised in Chapter 12 of the EIA Report reflects the agreed methodology. Section 12.5 of Chapter 12 details this method.	
THC 16 April 2024	THC email dated 1 May 2024, agreed with the proposed monitoring locations and that they would be subject to access.	Background noise survey was carried out and included measurement locations in all the agreed areas. Chapter 12 details the background survey locations.	**Chapter 12: Noise and Vibration**
Site Access, Traffic and Transport			
The Highland Council (THC) Transport	"Highland Council's Transport Planning Teams interests will relate largely to the impact of development traffic on the Council maintained road network and its users during the construction phase of the project. Transport Scotland's interest will relate to the impact of development on the trunk road network.	As mentioned in Chapter 3, the Proposed Development will be accessed from the A835, which is a trunk road and under the control of TS.	**Chapter 3: Description of the Development** and **Chapter 13: Site Access, Traffic and Transport.**
	Recommend that reference is made to the following documents: – Roads and Transport Guidelines for New Developments – Guidance on the Preparation of Transport Assessments	These documents have been referred to.	**Chapter 13: Site Access, Traffic and Transport.**
	Recommend that the route assessment process includes early consultation with the Highland Council Structures Team for implications to structures along Council maintained roads. The assessment process should also consider the implications to vulnerable road users that could be impacted by the proposed works.	The assessment of the route for the AILVs will include consultation with THC's Structures Team at the appropriate time. Vulnerable road users have been considered as appropriate in Chapter 13.	**Chapter 13: Site Access, Traffic and Transport.**
	For the construction stage, any submission should provide a breakdown of the anticipated vehicle movement profiles through the predicted 12-month construction programme. This should again be broken down by at least AIL's, standard large commercial goods vehicles (HGV's) and other construction-related traffic.	Vehicle movements for each month during the construction programme are provided in Chapter 13.	**Chapter 13: Site Access, Traffic and Transport.**
	When compiling data on predicted traffic movements serving this development, the assessment should set out and justify all assumptions made in support of the trip levels used. This includes for example any assumptions made about the amounts of material that could be obtained from borrow pits within or close to the site. However, if insufficient information has been gathered to determine the appropriateness of any material within the site for use in the works, we'll expect the assessment process to have reviewed the worst- case scenario of no such suitable materials being found within the site.	The number of vehicles has been estimated based on estimates of material quantities and assumes all necessary material is imported to the site.	**Chapter 13: Site Access, Traffic and Transport.**
	We note and welcome that the submitted report refers to identifying and determining the implications of other committed developments in the area. This should include other committed developments that have the potential to influence traffic levels on the proposed construction access route(s), including other energy generation and distribution schemes proposed in the area. Highland Council Planning Service should be able to review and comment on any committed developments that the assessment may need to take account	Cumulative effects are considered in Chapter 13. The construction of the Proposed Development is expected to last 23 months. Hence some construction related vehicles will be present on the road network during the busier summer season but will also be present during quieter periods. Baseline traffic data has been averaged over a year where available which reflects the fact that the	**Chapter 13: Site Access, Traffic and Transport.**

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	of. It is important to recognise that the public roads serving this site are heavily influenced by tourist traffic during the busier summer season. Any submission should recognise this and clearly set out how this has been recognised in the assessment process. Also, the predicted traffic generated by any timber extraction required in connection with this development should be recognised in the assessment	construction related vehicles would not be confined to any one season. Traffic expected to be generated by timber extraction has been included.	
	A Construction Traffic Management Plan (CTMP) may need to be provided as a form of mitigation for the predicted impacts of construction traffic.	A CTMP is proposed to be prepared for the Proposed Development, the satisfactory submission of which could be a matter covered by a condition of any consent. The matters that could be covered in a CTMP are listed in Chapter 13.	**Chapter 13: Site Access, Traffic and Transport.**
	Expect any submission to clarify the willingness to enter into a formal 'Wear & Tear' Agreement (Section 96 of the Roads (Scotland) Act 1984) with Highland Council. This is to protect The Council from any extraordinary expenses in having to repair the local public roads from any damage inflicted by the construction traffic activities of this development.	The Proposed Development will be accessed from the A835 trunk road, which is under the control of TS. A 'Wear and Tear' agreement with THC would therefore likely be limited to the roads under THC's control which would be used by AILVs.	**Chapter 13: Site Access, Traffic and Transport.**
	Any submission should set out the intended arrangements for surveying and recording the existing condition of the local public roads impacted by the proposed construction access route(s) prior to any works commencing at this site. It should then clarify how the condition of those roads will be reviewed during and at the end of the proposed development, along with how any repairs deemed necessary will be undertaken. Depending on the construction routes settled on, The Council is likely to require some form of financial security / road bond that they'd be able to call on in the event of the Developer not being able to repair damage inflicted to the roads by their construction activities to the satisfaction of The Council as the Local Roads Authority. Again, any submission should clarify the Promoters willingness to consider some form of road bond or other financial security linked to a 'Wear and Tear' agreement. When undertaking pre-works condition surveys, the Promoter may want to use that data to consider whether any works are required to repair or stabilise the existing roads forming the proposed construction access route(s) before their construction traffic starts to make use of them. It could be of benefit to the Promoter to work with Highland Council on such up-front repairs, as this could limit or remove the need for temporary restrictions to their proposed construction access arrangements during their works whilst emergency road repairs are undertaken.	The Proposed Development will be accessed from the A835 trunk road, which is under the control of TS. The matters referred to in this comment would therefore likely be limited to the roads under THC's control which would be used by AILVs.	**Chapter 13: Site Access, Traffic and Transport.**
	Transport Assessment Methodology: 1. Identify all public roads affected by the development, including routes from any ports used to receive and/or store turbine component parts. It is expected that the developer will submit preferred access route(s) for the development, both for abnormal loads and for	The route proposed to be used by AILVs delivering the turbine components is identified and assessed in Appendix 13.1. General construction traffic will use the A835 trunk road, which is under the control of TS.	**Technical Appendix 13.1: Route Access Survey**

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	general construction traffic, staff and suppliers. All other possible access route options should be identified, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process for arriving at the preferred route(s). The size of the proposed turbines may require an assessment for getting out of the preferred port, when chosen, as ports in the area may not have accommodated such large components before.		
	2. Set out the existing nature and condition of the public roads, including: • The road name and number, where applicable. • Road widths, including any pinch points. • The nature of their horizontal and vertical alignments, including any known steep gradients. • An appraisal of the carriageway strength including, where necessary, construction depths and road formation where there is likely to be significant impacts. • The location of any structures either spanning or supporting the roads, including a description of their nature (eg bridge, culvert etc), any width, and height or weight restrictions and where necessary, an assessment of their load carrying capability. This work should be undertaken by a suitably capable and qualified consulting engineer acceptable to The Council. • The nature and quantum of properties and other development types serviced by the roads. In addition to the quantum of residential properties, specific recognition should be made of any sensitive facilities such as schools, businesses or other community facilities along the roads. • The nature and quantum of existing traffic flows on these roads. This should include reference to how often the roads are used by school or commercial bus services and whether the routes are used by pedestrians, cyclists and equestrians. Our Public Transport Team may be able to assist with info on school and scheduled bus services (public.transport@highland.gov.uk) The historic pattern of road safety collision data (minimum 5-years worth of data) along the access route(s), identifying any locations where clusters of incidents could warrant specific road safety mitigation to safely manage the impacts of development-related traffic.	The Proposed Development will be accessed from the A835 trunk road, which is under the control of TS. Nonetheless, the nature and pertinent characteristics of the A835 trunk road in the vicinity of the Proposed Development has been described in Chapter 13. The load carrying capacity of any structures on THC's network will be a matter considered closer to the movement of any AILVs to the Proposed Development.	**Chapter 13: Site Access, Traffic and Transport.**

	3. Identify the anticipated impacts from the proposed development, including any cumulative impacts from other developments that have the potential to be happening at the same time. These impacts should include:
	• The quantum of new traffic impacting on these roads throughout the construction, operation and decommissioning periods of this development. This should cover:
	  • numbers of light and heavy vehicles (differentiated)
	  • numbers of abnormal loads
		The Proposed Development will be accessed from the A835 trunk road, which is under the control of TS. Nonetheless, the impacts of the traffic estimated to be generated by the Proposed Development are considered in Chapter 13.
		
		Swept path assessments for the AILVs delivering the turbine components are contained in the report in Appendix 13.1.
			Chapter 3: Description of the Development;
			Chapter 13: Site Access, Traffic and Transport; and **Technical Appendix 13.1: Survey Information**

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	• profiles of anticipated new traffic movements throughout the duration of the works • Any impacts to existing carriageways, structures, verges or other aspects of these public roads. This should include information on swept paths and gradient analysis where it is envisaged that the passage of traffic could be problematic. • Trial Runs for abnormal loads to be carried out in order to prove the route is achievable and/or to establish the extent of works required to facilitate transportation. • The location of any new or changes to existing accesses off these public roads to be used for accessing this development. This should include the extent of existing visibility from each of the accesses onto the public roads. • Any impacts or restrictions needing to be imposed on existing road users. Any impacts or restrictions needing to be imposed on adjacent properties or local communities serviced by these public roads.	The requirement for a trial run of the AILVs delivering the turbine components to the Proposed Development could be a matter covered by a condition of any planning consent. Access to the Proposed Development will be from the A835 trunk road, which is under the control of TS. Details of the access to the Proposed Development are provided in Chapter 3.	
	4. Set out the proposed mitigation measures needed to tackle the anticipated impacts set out above. This should include: • The location and nature of any carriageway widening or strengthening. • Works to improve the visibility at proposed access points with public roads and at junctions along the proposed access routes. • The location and nature of any strengthening or widening needed to existing structures. • The provision of new or enhanced passing places on single track roads. • Road safety measures deemed necessary to effectively manage the impacts of any identified road safety issues. • Traffic management proposals deemed necessary to enhance compliance with the traffic management plan associated with the construction and ongoing operation of this development. It should be noted that any such mitigation may need to be specifically considered within the wider considerations of the EIA, depending on the form, scale and location of the works proposed and their potential impacts to any existing environmentally sensitive sites.	Mitigation measures are described in Chapter 13.	**Chapter 13: Site Access, Traffic and Transport**
	5. Details of any residual effects on the road network and its users following the implementation of the proposed mitigation outlined above and any actions proposed associated with those residual effects.”	Residual effects are considered in Chapter 13.	**Chapter 13: Site Access, Traffic and Transport**
Transport Scotland	<u>Traffic and Transport</u> The design of any new/modified access junction must be compliant with the DMRB and supported by a Stage 1 Road Safety Audit in accordance with DMRB GG119. An RSA Brief should be submitted to TS. Changes to trunk road network must be approved by the Area Manager for the A835(T), Marco Bardelli.	The proposed study area is agreed. New or modified access will be compliant with relevant standards and an RSA brief will be submitted to TS when approval for any new access is sought.	**Chapter 13: Site Access, Traffic and Transport;** and **Technical Appendix 13.1: Survey Information**

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	TS is satisfied with scope of study area and approach, but add that baseline traffic flows would be subject to Low National Road Traffic Growth factors to determine the future year baseline. A threshold assessment should be undertaken for the A9(T) and A835. The RSR, should be included in the application, and will require to identify any pinch points on the trunk road network. Swept path analysis should be undertaken. Details are required pertaining to changes to street furniture/structures along the route.	Baseline traffic flows have been subject to NRTF 'low' growth factors and a threshold assessment has been undertaken for the A9 and A835. Appendix 13.1 provides details of the route proposed to be used for AILVs delivering turbine components to the Proposed Development and identifies key pinch points and swept path analyses. Street furniture that requires to be removed will be identified in due course.	
Socio-economics, Recreation, Tourism and Land Use			
Contin Community Council – Received 14 September 2023	This development is likely to interact negatively with the informal but popular Round Ben Wyvis mountain bike route.	Construction impacts on Ben Wyvis hill trails and summits are detailed in **Chapter 14, Section 14.8.41**. Operational impacts on Ben Wyvis trails and summits are detailed in **Chapter 14, Section 14.8.57**.	**Chapter 14: Socio-economics, Recreation, Tourism and Land Use**
	We perceive negligible direct economic benefit from the construction of the proposed development. Net Benefit Retained is rather more important than Gross Value Added. We see an overall disadvantage from the general industrialisation of an area that is attractive to tourists because it is not industrialised. The very high visibility of the proposed development is significant in this regard – visitors to the area via the A835 will see a monumental wind farm at the same time as they first see Ben Wyvis.	Economic impacts from construction and operation of the Proposed Development are discussed in **Chapter 14, Section 14.8.** Statkraft's approach to wealth-building is discussed in **Technical Appendix 14.1: Socio-economic Benefits and Community Wealth Building.** Operational impacts on visibility from the A835/North Coast 500 (NC500) are detailed in **Chapter 14, Section 14.8.79** and **Chapter 7: Landscape and Visual**.	**Chapter 14: Socio-economics, Recreation, Tourism and Land Use;** **Technical Appendix 14.1: Socio-economic Benefits and Community Wealth Building;** **Chapter 7: Landscape and Visual**
	There is a potential benefit from payments. The value of these needs to reflect the value of the electricity proposed to be generated and the needs of the area. A substantial number of properties in the Contin area have very poor insulation, leading to EPC ratings of F or G. Householders are struggling with heating bills. Typical improvement costs are of the order of £20-30k/property. Will the developers be contributingsufficient money to fix these houses over the next 10 years? 1% revenue minimum contribution is suggested, which will allow us to improve 60-70 houses over 10 years.	Community benefit is discussed in **Chapter 14, Sections 14.9.7-14.9.9**. and in **Technical Appendix 14.1 Socio-economic Benefits Report**	**Chapter 14: Socio-economics, Recreation, Tourism and Land Use;** **Technical Appendix 14.1: Socio-economic Benefits and Community Wealth Building.**
Energy Consents Unit – Received 14 September 2023	**Recreational/fisheries** – MSS also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report.	Fish Assessment, mitigation and monitoring is detailed in **Chapter 8, Ecology**. Construction and operational impacts upon anglers are detailed in **Chapter 14, Sections 14.8.33 and 14.8.59.**	**Chapter 8, Ecology;** **Chapter 14: Socio-economics, Recreation, Tourism and Land Use**

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	Annexe B states: The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive**. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity Index and support valuable recreational fisheries.**	The completed Marine Science Scotland (MSS) checklist, (as provided in Annex 1 of the standing advice) will be submitted alongside the Section 36 application.	
	Socio-Economics, Recreation, Tourism and Land Use We consider that this should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. Estimations of who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. should be included. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.	The requested Socio-Economics, Recreation, Tourism and Land Use chapter is included as Chapter 14 within the EIAR. Community benefit is discussed in **Chapter 14, Sections 14.9.7-14.9.9**. and Statkraft's approach to wealth-building is discussed in **Technical Appendix 14.1: Socio-economic Benefits** Tourism and Recreation impacts are discussed in **Chapter 14,** Sections **14.8.15 to 14.8.38** (construction impacts); and Sections **14.8.50 to 14.8.79** (operational impacts). Economic and employment impacts are discussed in **Chapter 14, Sections 14.8.2 to 14.8.14** (construction impacts) ; and **Sections 14.8.43 to 14.8.49** (operational impacts).	**Chapter 14: Socio-economics, Recreation, Tourism and Land Use;** **Technical Appendix 14.1: Socio-economic Benefits.**
Aviation			
NATS En Route Ltd (NERL) Ref SG35671 dated 04 July 2023	No safeguarding objection.	N/A	**N/A**

Consultee and Date	Consultees Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
MOD DIO 10059306 dated 20 July 2023	Concerns raised over turbines creating a low flying obstruction.	An aviation lighting and mitigation report has been provided to the MOD	**Chapter 15: Aviation**
Highlands and Islands Airports Ltd (HIAL) 2023/206/INV dated 20 July 2023	'This development may impact the safeguarding criteria and operations of Inverness Airport'.	HIAL requested an Aviation Impact Feasibility Study (AIFS) of the Proposed Development. This is currently being provided and referred to in Chapter 15.	**Chapter 15: Aviation**
Other Environmental Considerations			
The Highland Council (THC) Scoping 25th August 2023	**Miscellaneous: Health and Safety and Shadow Flicker** The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation, and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the site. Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements. A number of the aforementioned matters should be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application as well as an outline Decommissioning and Reinstatement Plan. Given that the final layout for the turbines and the candidate turbine is yet to be selected, a shadow flicker assessment should be undertaken as part of the EIAR. That said, if there are no properties within 11 rotor diameters the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIAR.	The EIAR has addressed all relevant climatic factors, and consideration has been given to the potential health and safety risks – these have been addressed within the relevant technical chapters, with a summary included within **Chapter 16: Other Environmental Considerations**. An Outline Construction Environmental Management Plan is included as **Technical Appendix 3.1** of the EIA Report. An outline Decommissioning Restoration and Aftercare Strategy (DRAS) will be produced in agreement with relevant consultees prior to the commencement of construction, should the Proposed Development gain consent. It is anticipated that this would be secured via a suitably worded planning condition. A Shadow Flicker assessment has been undertaken for all properties within 11 rotor diameters of the Proposed turbine locations.	**Chapter 16: Other Environmental Considerations; and** **Technical Appendix 3.1: Outline CEMP.**
	Aviation, Radar and Telecoms The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained	The EIAR has identified the assets as requested, detailed in **Chapter 15: Aviation**, and **Chapter 16: Other Environmental Considerations.** Consultation with relevant Aviation consultees (HIAL, MOD, CAA and NATS) has been undertaken and is detailed in **Chapter 15: Aviation.**	

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	within the EIAR to determine whether any suspensive conditions are required in relation to such issues. There should be continued dialogue with HIAL over the impact on the radar at airports in the area, in particular Inverness Airport. The MOD will advise of aviation lighting requirements, and we suggest early talks with the MOD and CAA regarding acceptable methods to mitigate impacts from such lighting. As things stand, HIAL and NATS both advise that the development would be unlikely to infringe the safeguarding criteria of either organisation however any changes to the proposal may change their respective responses. The MOD advises that the development will be required to be fitted with aviation safety lighting and that you will be require to provide it with sufficient data to ensure that structures can be accurately charted in the interests of aircraft safety. If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.		
BT Group	Thank you for your email dated 04/07/2023. We have studied this Carn Fearna Wind Farm proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that the Turbine locations provided within the attached should not cause interference to BT's current and presently planned radio network.	Noted with thanks.	
Joint Radio Company Scoping 4th July 2023	**Fixed Links/Telecoms** Unfortunately, part (or all) of the proposed development breaches one or more of these limits. The affected links are 1GHz Microwave Point to Point, therefore JRC OBJECTS TO THE PROPOSED DEVELOPMENT. *** NB. JRC previously objected to this development directly to Statkraft, in WF271053 on 28/3/2022. *** Unfortunately, since these links form part of our critical national infrastructure, no details apart from the link identifiers can now be supplied, due to previous breaches in confidentiality. However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone.	Further design amendments and consultation with JRC outwith the Scoping exercise has resulted in the removal of their objection, and the Proposed Development has been cleared by JRC with respect to radio link infrastructure operated by the local energy networks. Details of Design Changes are available in **Chapter 2: Site Description and Design Evolution**, and Consultation is detailed in **Chapter 16: Other Environmental Considerations.**	**Chapter 2: Site Description and Design Evolution ; and Chapter 16: Other Environmental Considerations.**

Full references used in **Table 1** can be found within the relevant technical chapter of the EIA Report **(Chapters 7-16)**.