

Technical Appendix 4.1: Scoping Response Table

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Summary of Consultation Actions and Responses..... 1

Summary of Consultation Actions and Responses

Table 1 below provides a summary of the Environmental Impact Assessment (EIA) Scoping Responses received and the actions taken by the Applicant in response.

Table 1 – Scoping Response Table

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
Statutory Consultees			
Argyll and Bute Council (4th April 2024)	<p>The EIA Report must include:</p> <ul style="list-style-type: none"> – A description of the physical characteristics of the whole development and the full land use requirements during the operational, construction and decommissioning phases; – A description of the main characteristics of the production processes, for instance, nature and the 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 <p>The estimated cumulative impact of the project with other consented or operation development.</p>	<p>Noted for EIA. Chapter 4 – Approach to EIA sets out the EIA Requirements as identified in Regulation 4 and 5 of EIA Regulations 2017. Tables 4.1 and 4.2 identify the requirements under the EIA Regulations and what chapters of the EIA Report the information can be found. It also confirms those issues that were scoped out of the EIA Report.</p> <p>Chapter 3 – Description of Proposed Development provides the description of the physical characteristics of the Proposed Development from construction through operation and decommissioning phases.</p>	<p>Chapter 3 – Description of Proposed Development and Chapter 4 – Approach to EIA.</p>
Argyll and Bute Council (4th April 2024)	<p>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:</p> <ul style="list-style-type: none"> – The range of technologies that may have been considered; – Locational criteria and economic parameters used in the initial site selection; – Options for access; – Design and locational options for all elements of the Proposed Development (including grid connection); and – The environmental effects of the different options examined. <p>The assessment should also highlight sustainable development attributes including, for example, assessment of carbon emissions / carbon savings.</p>	<p>Noted for the EIA. The discussion of alternatives and the main reasoning for the final project design will be highlighted within Chapter 2 – Site Description and Design Evolution.</p> <p>Carbon emissions and carbon savings are covered in the Carbon Balance section of Chapter 14.</p>	<p>Chapter 2 – Site Description and Design Evolution and Chapter 14 – Other Considerations.</p>

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
Argyll and Bute Council (4th April 2024) LVIA	<p>The EIA Scoping Report sets out that the following operational windfarms are considered:</p> <ul style="list-style-type: none"> – Cruach Mhor Wind Farm consists of twenty-four turbines with a tip height of 71 m, located approximately 11.7 km to the north-west of the Proposed Development along the northern face of Cruach Mhor mountain. – Inverclyde Wind Farm is a ten turbine development with a tip height of 110 m and is located approximately 15.3 km from the site, across the River Clyde estuary. <p>There is a high level of commercial scale wind energy development within Argyll and Bute. This development will further extend the number of proposals of this type in the surrounding area, necessitating appropriate and full assessments of cumulative impacts.</p>	<p>Noted for the EIA. All potential wind and energy infrastructure developments within 30km have been taken into account.</p> <p>Consultation with the NatureScot has been undertaken to inform the selection of viewpoints.</p>	Chapter 5 – Landscape and Visual Impact Assessment (LVIA).
Argyll and Bute Council (4th April 2024) LVIA – Third Party Applications	<p>The applicant should also be aware of the recent refusal by Scottish Ministers of Narachan Wind Farm due to the proposed use of a suspensive planning condition for Aviation Detection Lighting Systems to mitigate the landscape impact of that development on the National Scenic Area of North Arran.</p> <p>Several other proposed wind farms in this locality have been refused:</p> <ul style="list-style-type: none"> – Other proposed wind farms in this locality have been refused, including Corlarach Hill Wind Farm which was refused in 2007 due to the potential significant adverse impacts on nationally important landscapes. <p>The Strone Saul Hill Wind Farm was primarily refused in 2009 on the grounds that there was insufficient assessment regarding potential impact on golden eagle and black grouse populations.</p>	Noted for EIA. No action required.	Chapter 5 – LVIA.
Argyll and Bute Council (4th April 2024) LVIA – Landscape Character Types	<p>Separate volumes of visualisations should be prepared to NatureScot guidance. Argyll and Bute Landscape Wind Energy Capacity Study (ABLWECS) 2017 remains part of the development plan.</p> <p>The Capacity Study is a material and relevant consideration in the determination of wind farm proposals and it is recommended that it is considered fully in the LVIA process, taking into account adjacent Landscape Character Types (LCTs) impacted by the proposal as well as the receiving LCT. The proposed turbines in the scoping layout lie within the boundary of the ABLWECS</p>	<p>Noted for EIA. Visualisations presented in the EIA Report have been prepared to NatureScot guidance on the assessment of Special Landscape Qualities (2024).</p> <p>The ABLWECS was consulted to consider the landscape and visual sensitivity and a range of environmental and other factors to the Proposed Development. The LVIA Report has also considered the North Ayrshire Landscape Wind Capacity Study (NALWCS), 2018 and ClydePlan</p>	Chapter 5 – LVIA.

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	<p>LCT 1: Steep Ridgeland and Mountains Landscape Character Type (LCT), which forms the upland areas between Loch Fyne and the Firth of Clyde.</p> <p>Nearby character types include an area of the 4 Mountain Glens LCT around the shores of Holy Loch. The EIA Scoping Report notes that proximity to the Clyde and sea lochs has a strong influence over the visual character of views in the area, with lochs, sea lochs, and islands often featuring in views which are contained and channelled along and across the water from lower lying settled coastal areas and transport routes.</p> <p>Uplands, moorlands and forestry provide backdrops and skylines to these coastal locations. The site lies within an open upland area which is surrounded by forest to the south and east and smaller areas of woodland to the north and west. Inland transport routes typically follow valleys and are often vegetated with limited outward visibility. Views from accessible areas of higher ground often offer extensive panoramic outlooks.</p>	<p>Landscape Capacity Study for Wind Turbine Development in Glasgow and the Clyde Valley, 2018 (LCSGCV) to inform the assessment.</p>	
Argyll and Bute Council (4th April 2024) LVIA – Affiliated Infrastructure	<p>The LVIA assessment must include the expected landscape and visual impact of: BESS, on-site borrow pits, and access roads.</p>	<p>Noted for EIA. All elements of the Proposed Development are considered and will be included in all visualisations.</p>	Chapter 5 – LVIA.
Argyll and Bute Council (4th April 2024) LVIA – Cumulative/Recreation	<p>It is recommended that viewpoint selection for other wind farms in Cowal informs the final viewpoint selection.</p> <p>Water based viewpoints should also be considered/included as important receptors in this landscape e.g. water based recreation.</p>	<p>Noted for EIA. Locations of certain viewpoints along the Cowal Peninsula have been slightly adjusted to consider these attributes. Further, consultation was undertaken with NatureScot (who also coordinated input from Loch Lomond and the Trossachs National Park Authority (LLTNPA)) to agree viewpoints.</p> <p>Common viewpoints and sensitive receptors have been identified and assessed where feasible; however, previous applications predate current guidance and relate to smaller turbines. As such, viewpoints are selected according to best practice and based on the Zone of Theoretical Visibility Study.</p> <p>In discussions with NatureScot, illustrative views (photowires) have been included to represent views on ferry routes.</p>	Chapter 5 – LVIA.

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Argyll and Bute Council (4th April 2024) LVIA – Aviation Lighting	Due to the proposed height of the turbines, aviation lighting will be required, it is recommended that this, as well as any potential cumulative effects with other wind farms are fully assessed in accordance with the requirements of NatureScot. The potential impact of aviation lighting at night should be fully considered.	Aviation lighting as a means of mitigation will be considered and proposed within the EIA Report. A total of four night time visualisations will be provided as part of the LVIA. Further, a Night Time Assessment of agreed viewpoints undertaken as part of the LVIA. An Aviation Lighting and Mitigation Technical Report has also been included as part of this application in Technical Appendix 13.1 – Giant's Burn Aviation Lighting and Mitigation Report.	Chapter 5 – LVIA and Chapter 13 – Aviation.
Argyll and Bute Council (4th April 2024) Biodiversity	At time of writing advice from the Council's Local Biodiversity Officer (LBO) has not been obtained. It is therefore not possible to provide comment on the scope of these assessments.	Noted for EIA. In absence of comments, all ecology and ornithology survey and assessment work has been undertaken in line with relevant legislation, policy and guidance, as well as industry best practice. Further, a Biodiversity Enhancement Strategy has been included as part of the submission to meet current industry policy and guidance.	Chapter 6- Ecology and Chapter 7 – Ornithology.
Argyll and Bute Council (4th April 2024) Watercourses	The Hydrological Context Map displays 50 m buffer zones surrounding watercourses and the proposed locations of the wind turbines. There is a small overlap of the buffer zones with two of the proposed turbine locations (turbine numbers 4 and 5). It is advised that these are relocated outwith the 50 m buffer zone, so that they are located at a stand-off distance of at least 50 m from the watercourse.	Noted. Scoping responses were taken into consideration and the final design has been designed to avoid watercourse buffers, in addition to a number of additional constraints. T4 and T5 have been relocated to ensure they are outside the 50 m watercourse buffer.	Chapter 8 – Hydrology, Geology and Peat.
Argyll and Bute Council (4th April 2024) Hydrology	Consent granted for this application providing the following conditions are adhered to: <ul style="list-style-type: none">– Any proposed watercourse crossings should not reduce the existing capacity of the channel and ideally be designed to convey the 1 in 200 year plus climate change (56% allowance) flood event.– Surface water drainage should be designed in accordance with CIRIA C753 and ensure that post development surface water runoff does not exceed the predevelopment surface water runoff. The surface	Twelve watercourse crossings are required as part of the Proposed Development. The proposed water crossings will be constructed as feasibly close to right-angles with the watercourse as possible, in accordance with standard practice set out in SEPA's Engineering in the water environment: Good Practice Guidance – River Crossings (2010). Bottomless arch culverts will be implemented where possible, with one	Chapter 8 – Hydrology, Geology and Peat.

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	<p>water drainage should be in operation prior to the start of construction.</p> <p>All turbines to be situated at a minimum 50 m stand-off distance from the nearest watercourse (i.e. proposed turbines 4 and 5 to be relocated so that they are outside of the 50 m buffer zone, as shown on the provided Hydrological Context Map).</p>	<p>flush crossing proposed where a clear water channel is not present.</p> <p>Drainage for the Proposed Development has been designed in accordance with CIRIA C753 and SuDS guidance. The Proposed Development drainage design is illustrated in Figures 3.8-3.16.</p>	
Argyll and Bute Council (4th April 2024)	West of Scotland Archaeology Service (WoSAS), is content with the proposed assessment subject to the views of Historic Environment Scotland (HES) and welcomes the intention include walk over and LiDAR surveys.	Noted for EIA.	Chapter 4 – Approach to EIA and Chapter 9 – Cultural Heritage
Argyll and Bute Council (4th April 2024) Traffic and Transport	At time of writing advice from the Area Roads Engineer has not been obtained. It is therefore not possible to provide comment on the scope of these assessments.	Noted for EIA. In absence of comments, the traffic and transport assessment has been undertaken in line with relevant legislation, policy and guidance, as well as industry best practice.	Chapter 10 – Traffic and Transport
Argyll and Bute Council (4th April 2024) Noise	<p>The Council and Consultees agree:</p> <ul style="list-style-type: none"> – That construction noise can be constrained to recommended limits via a suitable planning condition; and therefore, scoped out; – With the proposed methodology to determine ETSU-R-97 limits and look forward to discussions on Background Noise assessment and; – With the cumulative search area of 3 km from the Proposed Development to confirm whether cumulative wind farm noise should be scoped in or not; and <p>That the provision of information regarding tonality can be requested via a Tonality and Impulsivity date.</p>	<p>Noted for EIA. A construction noise assessment at the nearest receptors has been conducted in accordance with BS 5228-1. Operational noise impact assessment has been conducted following ETSU-R-97 and the IoA good practice guidance.</p> <p>An updated review of the surrounding area was conducted. No operational, consented, or in planning wind turbines were identified within 3 km of the Proposed Development. As such, a cumulative assessment has been scoped out of this study.</p>	Chapter 11 – Noise.
Argyll and Bute Council (4th April 2024) Shadow Flicker	<p>The Council and Consultees agree:</p> <ul style="list-style-type: none"> – With the proposed methodology to conduct the shadow flicker impact assessment; – That the recycling centre to the north of Turbine is not sensitive to shadow flicker effects; and – That 30 hours of flicker is a suitable threshold below which no mitigation is required. 	Noted for EIA. Assessments will be undertaken as specified in the Scoping Report.	Chapter 14 – Other Considerations.

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Argyll and Bute Council (4th April 2024) Recreation	<p>Section 11 of the Report Socio-Economics, Tourism and Recreation has not acknowledged that the public have a legal right of access to all of the land within the site boundary at present under the Land Reform Scotland Act 2003. The public can and do exercise their legal rights of access in this area which they can do to walk, cycle or ride a horse. The Strava Heat Map for the area demonstrates that the public visit the hills in the area including Bishop's Seat, Eilligan with some continuing north to Leacann nan Gall and others descending SA37 the Public Right of Way which links Balagown with Inverchaolain. The EIA will need to consider the visual impacts of the proposed wind farm on people using the Public Right of Way, Bishop's Seat and other hills in the immediate area.</p> <p>The forestry tracks in the area are well used by walkers, runners, cyclists and presumably horse riders. They should, as far as possible, continue to be able to exercise their legal rights of access along the tracks throughout the construction period.</p>	<p>Noted for EIA. Chapter 5 – LIVA includes an assessment of the Proposed Development on residential amenity, including core paths within the Site and surrounding area.</p> <p>Any potential impacts on recreation are included in Technical Appendix 10.2 – OAMP. This outlines mitigation measures that should be implemented during the different phases of the Proposed Development. A final OAMP will be written in conjunction with Argyll and Bute Council's ('the Council') Principal Contractor, Transport Officers and Access Officers.</p> <p>Further, it is anticipated that access tracks will be upgraded for recreational use when the Proposed Development is operational. Technical Appendix 10.2 – Outdoor Access Management Plan details information about safeguarding these upgraded access tracks when the Proposed Development is operational.</p>	Chapter 5 – LVIA and Chapter 10 – Traffic and Transport.
Argyll and Bute Council (4th April 2024) Socio-Economics	<p>There is an opportunity with the construction of new tracks to serve the wind farm to improve public access to the summit of the hill.</p> <p>There may be a further opportunity to create a circular route depending up on the layout of the tracks to create a circular route by connecting adjacent spurs with a short length of path, this could be a simple quad bike track and could utilise the stone removed from temporary tracks or hard standings.</p> <p>Where access controls are installed they should be designed such that they do not obstruct the public's legal rights of access along the tracks.</p>	<p>Noted for EIA. It is anticipated that access tracks will be upgraded for recreational use when the Proposed Development is operational. Technical Appendix 10.2 – Outdoor Access Management Plan details information about safeguarding these upgraded access tracks when the Proposed Development is operational.</p>	Chapter 10 – Traffic and Transport
Argyll and Bute Council (4th April 2024) Aviation	<p>The Council understands that advice from relevant consultees with expertise in this field will be sought in this regard.</p>	<p>Noted for EIA. Consultations with relevant bodies have been sought and the aviation assessment has been undertaken by an appropriately qualified consultant.</p>	Chapter 13 – Aviation .

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Argyll and Bute Council (4th April 2024) Telecommunications and Electronic Interference	The Council understands that advice from relevant consultees with expertise in this field will be sought in this regard. The Council is satisfied with the intended approach as detailed in the Scoping Report.	Noted for EIA. Consultations with relevant bodies has been sought.	Chapter 14 – Other Considerations
Argyll and Bute Council (4th April 2024) Climate Change	The Council is satisfied with the intended approach as detailed in the Scoping Report.	Noted for EIA. No action required.	Chapter 4 – Approach to EIA and Chapter 14 – Other Considerations.
Argyll and Bute Council (4th April 2024) Dust and Air Quality	At time of writing, it has not been possible to obtain advice from the Council's Environmental Health Officer (EHO). It is therefore not possible to provide comment on air quality.	Noted for EIA. In absence of comments, all assessment work has been undertaken in line with relevant legislation, policy and guidance, as well as industry best practice. Further information of dust and air quality control can be found in Technical Appendix 3.1 – Construction Environmental Management plan (CEMP).	Chapter 3 – Description of Proposed Development
Argyll and Bute Council (4th April 2024) Population and Human Health	The Council is satisfied with the intended approach as detailed in the Scoping Report.	Noted for EIA. No action required.	Chapter 4 – Approach to EIA and Chapter 14 – Other Considerations.
Argyll and Bute Council (4th April 2024) Major Accidents and/or Disaster	The Council is satisfied with the intended approach as detailed in the Scoping Report. However should the proposed BESS be incorporated and consented, an Emergency Response Plan and Decommissioning Bond would be required in line with emerging guidance from Scottish Fire and Rescue and Heads of Planning Scotland	Noted for EIA. The Applicant will comply with all relevant laws and regulations concerning fire safety and safety measures would be incorporated within the proposed BESS.	Chapter 4 – Approach to EIA and Chapter 14 – Other Considerations
NatureScot (29th March 2024)	Our initial advice, based on our current understanding of the Proposal, is that it is located in a highly sensitive and prominent location which may give rise to natural heritage concerns of national interest which could prove difficult to overcome. As such, there is a possibility that we may object to an application for permission to build a wind farm in this location. The key issues NatureScot require to be addressed in detail as part of the EIA process include: – Potential individual, and cumulative landscape and visual effects; – Potential construction and operational effects on sensitive bird species; and – Potential impacts on peat and peatland habitats of national importance.	Noted for EIA. It is understood that the Proposed Development is location in a sensitive location; however, embedded mitigation through the design process has been undertaken to inform the final design. Further, industry best practice has been followed in relevant sections of the EIA Report to reduce the potential for significant effects.	Chapter 5 – LVIA, Chapter 6 – Ecology, and Chapter 7 – Ornithology.

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NatureScot (29th March 2024) LVIA	<p>As noted within the Scoping Report, several wind farm developments have been previously refused on or near the site of the Proposal.</p> <p>The nearby Corlarach Wind Farm (2007, approximately 3.4 km to the south of the Proposal), and Black Craig wind farm applications (2007, within 1 km to the southwest), were objected to by NatureScot on the grounds of unacceptable adverse landscape and visual impacts. Corlarach and Black Craig were refused at PLI primarily on the basis of significant detrimental landscape and visual impacts (non-cumulative and cumulative). NatureScot also objected to the application for Eilligan wind farm (2009; located on the same site as the current Proposal, referred to as StroneSaul in the Scoping Report) on the basis of significant adverse landscape and visual impacts, with conditions recommended to mitigate or compensate for the loss of terrestrial habitat (blanket bog, wet heath) and to reduce impacts upon upland raptors including golden eagle. Section 2.2.Cumulative Context of the current Scoping Report is therefore inaccurate regarding the primary reason for refusal, as Eilligan (Strone Saul) was primarily refused due to landscape impacts. RSPB also raised concerns regarding the proposal's potential to impact on golden eagle.</p> <p>Proposals for Bachan Burn wind farm (2013), approximately 1.6 km to the southeast of the current Proposal, were withdrawn; NatureScot had also raised significant concerns over landscape impacts at scoping stage. The site has since been investigated by another developer (Allt Mhor, 2019) and NatureScot provided pre-application advice highlighting established landscape concerns and advised that we did not consider this to be an appropriate location for a wind development of this scale; no related planning applications were submitted subsequent to this.</p> <p>It is noted that previous applications were for turbines of 145 m height or less; the current application proposes a maximum height of 200 m which serves to further exacerbate known landscape and visual impacts.</p>	<p>Noted for EIA. It is understood that the Proposed Development is location in a sensitive location; however, embedded mitigation through design process has been undertaken to inform the final design. In addition to this, relevant capacity studies – ABLWECS, NALWCS and LCSGCV to inform the assessment.</p> <p>Previous applications have been reviewed and comments have been noted to inform the final design of the Proposed Development.</p>	Chapter 2 – Site Description and Design Evolution, Chapter 3 – Description of Proposed Development and Chapter 5 – LVIA.
NatureScot (29th March 2024) LVIA – Landscape/Seascape	This proposal has the potential to result in significant adverse effects on the Loch Lomond and Trossachs National Park which may raise issues of national interest. In addition, the effects could result in a significant and	Noted for EIA. Loch Lomond and the Trossachs National Park character Assessment (2010) and The Special Landscape Qualities of the Loch Lomond	Chapter 5 – LVIA.

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	substantial change to the Upper and Inner Clyde Landscape/Seascape. Both of these aspects could lead to a NatureScot objection.	and The Trossachs National Park, Scottish Natural Heritage, 2010 and related description under Outcome 2 of the Loch Lomond and the Trossachs 2018-2023 Partnership Plan have been included as part of the assessment. Further, consultation was undertaken with NatureScot (who also coordinated input from Loch Lomond and the Trossachs National Park Authority (LLTNPA)) to agree viewpoints. In discussions with NatureScot, illustrative views (photowires) have been included to represent views on ferry routes	
NatureScot (29th March 2024) LVIA – Special Landscape Qualities	Please note that we are currently preparing to consult on a revised draft guidance for assessing Special Landscape Qualities and request that once this is publicly available (expected to be April 2024) that this methodology be used instead of the 2017 version.	Noted. Updated guidance has been implemented for the EIA Report.	Chapter 4 – Approach to EIA and Chapter 5 – LVIA.
NatureScot (29th March 2024) LVIA – Landscape Character	The Proposed Development lies within the Steep Ridges and Mountains Landscape Character Type (LCT) which extends across the boundary of the National Park. Given the information provided, we consider there is potential for significant and adverse effects on the Special Landscape Qualities (SLQs) as appreciated from Loch Eck, Summits and Hills from the Cowal Peninsula extending toward the Arrochar Alps, and the Coastal Fringes facing the site including Kilmun and Strone Point.	Noted for EIA, A full landscape character assessment has been included as part of the LVIA.	Chapter 5 – LVIA.
NatureScot (29th March 2024) LVIA – Landscape/Seascape	The Seascape/Landscape assessment of the Firth of Clyde should also be referenced as one of the baseline assessments given the interplay of seascape and landscape in this area - https://marine.gov.scot/information/clyde-landscape-seascape-assessment	Noted for EIA. This piece of guidance has been included in the LVIA.	Chapter 5 – LVIA.
NatureScot (29th March 2024) LVIA	Based on the supplied information, we cannot agree that receptors at greater than 20 km should be scoped out, particularly visual receptors. The ZTV shows large amounts of visibility along the Inner and Outer Clyde and surrounding coastlines (Fig. 4.1) to the East and South. Receptors should be scoped in or out based upon likelihood of significant effects rather than a set distance.	The proposal of a 20 km study area was deemed to be sufficient to include all non-Negligible effects and was therefore based on the likelihood of significant effects. This assessment also considers the potential for effects beyond 20 km.	Chapter 5 – LVIA.

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	We agree with the items to be scoped out apart from the first bullet, as discussed above. In addition, we consider the Kyles of Bute National Scenic Area (NSA) may be scoped out, as there appears to be no visibility from the area. Should any modifications to the turbine height and/or location occur, the visibility within the NSA should be checked in case it would merit being included again.		
NatureScot (29th March 2024) Forestry	The overhead line (OHL) upgrade that is going to be implemented will result in the clear felling of large swathes of woodland in the area. Alongside this there are large sections of diseased larch in the area with action imminent to clear fell large swathes of woodland. These two landscape changes will have cumulative impacts but will also open views to the proposal that are not currently available. We would advise liaison with Scottish and Southern Electricity Network (SSEN) and Scottish Forestry (SF) to provide information of these changes to be reflected and included in the assessment.	Information on the felling required for the OHL was not available at the time of drafting of the EIA Report. The Applicant is happy to have discussions with SSEN and SF when information is available.	Chapter 12 – Forestry
NatureScot (29th March 2024) LVIA	<p>We agree with the proposed scope of the assessment, subject to the points raised. In addition, we would expect the assessment of the Special Landscape Qualities of LLTNP, to follow the method set out within our draft Guidance on Assessing the Effects on Special Landscape Qualities (AESLQ) supplied as an attachment to this advice. The scoping Report doesn't go into any depth on which SLQs are proposed to be assessed. We would be happy to discuss this aspect in more detail. We think the following SLQs should form part of the assessment :</p> <p>General Qualities</p> <ul style="list-style-type: none"> – A world-renowned landscape famed for its rural beauty. – Wild and rugged highlands contrasting with pastoral lowlands. – Water in its many forms. – Tranquility. – Settlements nestled within a vast natural backdrop. – The easily accessible landscape splendour. <p>Argyll Forest</p> <ul style="list-style-type: none"> – A remote area of high hills and deep glens 	<p>Noted for EIA. Further consultation was undertaken with NatureScot (who also coordinated input from Loch Lomond and the Trossachs National Park Authority (LLTNPA)) to agree viewpoints.</p> <p>The approach used in the LVIA assessment is informed by the guidance provided in 'Special Landscape Qualities - Guidance on Assessing Effects' (Nature Scot, 2025).</p>	Chapter 5 – LVIA.

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	<ul style="list-style-type: none"> – A land of forests and trees – Arrochar's mountainous and distinctive peaks – A variety of glens – The slender jewel of Loch Eck – The seaside architecture of Kilmun and Blairmore <p>We would expect this list to act as a starting point to focus the assessment; we would expect after initial assessment some SLQs may be scoped out if the assessment finds no significant effects.</p>		
NatureScot (29th March 2024) LVIA	<p>Regarding the proposed viewpoints (Table 4.1 of the Scoping Report), as there are no grid references and the quality of the ZTV and mapping is quite pixelated it is difficult to cross reference where the proposed viewpoints are. Our suggestions may double up with viewpoints already proposed. We are generally happy with the proposed viewpoints, subject to the inclusion of the following viewpoints that we have discussed and agreed with LLTNP:</p> <p>NatureScot</p> <ul style="list-style-type: none"> – A viewpoint representative of ferry travel/recreational travellers on the Clyde – Dunoon to Gourock Ferry, for example. – Ardmore Point – Representative views across the Outer Clyde c. 231339.92, 678809.84 – Benmore Gardens - Wright Smith Memorial Viewpoint, to retain proposed lower-level viewpoint as well. – Kilmun - NS174812, or Arboretum visitor centre. – Loch Eck, car park/picnic area Rubha Croise 214126, 693041, and/or Dornoch Point 214098, 694627 – Beinn Bheula – Panoramic view from Arrochar Alps - 215471, 698323 <p>LLTNP</p> <ul style="list-style-type: none"> – As included on the 'wee hills big views' part of the LLTNP website – https://www.lochlomond-trossachs.org/things-to-do/walking/hillwalking/wee-hills-big-views/ – Strone Hill, Stronchuillin Hill or Beinn Ruadh 	<p>Further consultation was undertaken to refine the list of viewpoints to be included in the assessment. The final list of viewpoints is provided in Table 5.2 and shown on Figure 5.1. In addition, some illustrative views were agreed. Viewpoint changes as a result of consultation were as follows:</p> <ul style="list-style-type: none"> – Viewpoint 8 was moved north to Dornoch Point. – Viewpoint 11 representing views from the National Park to the east was moved from A817 to the John Muir Way at Gouk Hill, however the final design had limited/no visibility from Gouk Hill and this viewpoint was moved to a nearby location on the John Muir Way at Bannachra Muir. – Viewpoints 21-24 were added. – Illustrative views (cumulative wirelines) were added at Ben Narnian, Beinn Bheula and Conic Hill (see Technical Appendix 5.3 – Illustrative Views). – Illustrative views (photowires) were added at Kilmun, and on the Gourock-Dunoon ferry (see views J and L Appendix 5.3 – Illustrative Views). 	Chapter 5 – LVIA

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	<ul style="list-style-type: none"> – Coylet Inn/beach area – Gouk Hill on the LLTNP 'wee hills big views' website and also John Muir Way – Ben Narnian - 227189, 706635 <p>We agree with the scope of the cumulative assessment and are not aware of any pre-application stage wind farms that warrant inclusion within the cumulative assessment based on their proximity and/or similar application timescales.</p>		
NatureScot (29th March 2024) Ornithology	The Proposal sits directly to the east of known golden eagle territory G/C2, and preferred nest sites were historically located to the northeast of this range. The G/C2 territory has already been impacted by afforestation at Inverchaolain glen and whilst the 2015 golden eagle national survey only identifies one pair, at the time of associated surveys in 2016 there was potentially an additional eagle pair establishing in the area (four individuals observed using the glen). As such, there is the possibility of a split territory which may have resulted in nest establishment closer to the site of the Proposal and may further increase sensitivity of eagles to land use changes to the east of the G/C2 range.	<p>Noted for EIA. Surveys were undertaken during April to August 2024 specifically to address the question as to whether there are one or two golden eagle territories within 6km of the Proposed Development. Survey results suggest there is only one golden eagle territory.</p> <p>Golden Eagle Territory (GET) modelling has been undertaken and the potential for range loss has been assessed in Chapter 7 – Ornithology.</p>	Chapter 7 – Ornithology.
NatureScot (29th March 2024)	We agree that Special Protection Areas can be scoped out of the EIA due to lack of connectivity.	Noted for EIA.	Chapter 4 – Approach to EIA.
NatureScot (29th March 2024) Ornithology	We have several concerns with the baseline ornithology data based on the methodology described, which will need to be further justified within the EIA Report. Due to changes in layout, the applicant does not have 30 months of VP data covering the whole site; VP6 (covering turbines 7, 8 and 9) was only carried out for 12 months. Turbines 2, 3 and 4 are also considered not to be well covered as these are on the edge of viewsheds.	Noted for EIA. A full outline of the survey and assessment methodologies utilised in the EIA Report is included within Technical Appendix 7.1 – Ornithology Technical Report.	Chapter 7 - Ornithology
NatureScot (29th March 2024) Ecology	We agree with the proposed survey scope and assessment method as described within the Scoping Report, which confirms that habitat surveys, including National Vegetation Classification (NVC) surveys, are to commence in 2024. This should be undertaken across the entire Proposed Development due to the potential for priority peatland to be affected.	<p>Noted for EIA. Information regarding habitat and vegetation surveys, including detailed NVC habitat descriptions, are located within this chapter and Technical Appendix 6.2 – Habitats and Vegetation Survey Report.</p> <p>The results of these surveys were used to inform the design and layout process,</p>	Chapter 2 – Site Description and Design Evolution and Chapter 6 – Ecology.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	<p>We recommend that these survey results are used to inform the design and layout process, so that the development avoids, where possible, sensitive habitats such as blanket bog and montane heath. Where this is not possible, impacts should be minimised and suitable mitigation, restoration and/or compensation measures be proposed.</p> <p>Assessment should consider the extent of habitat loss and damage, both direct and indirect, temporary and permanent, and suitable mitigation and/or restoration measures should be presented in an Outline Habitat Management Plan and Peat Management Plan.</p>	<p>which is described within Chapter 2 – Site Description and Design Evolution.</p> <p>Mitigation, restoration and compensation measures are described within this chapter and within the Biodiversity Enhancement Strategy (BES) which is located within Technical Appendix 6.5. An outline PMP is located within Technical Appendix 8.1 – Peat Management Plan.</p>	
NatureScot (29th March 2024) Peat	<p>We recommend that the applicant follows the following guidance, which should inform the design of the development: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management</p>	<p>Noted for EIA and guidance has been given full consideration.</p>	Chapter 8 – Geology, Hydrology and Peat.
NatureScot (29th March 2024) Mitigation	<p>We have significant concerns regarding potentially significant adverse landscape and visual impacts which are unlikely to be overcome by mitigation, as well as the potential for cumulative effects on the NHZ14 golden eagle population which could raise issues of national interest and impacts on priority peatland habitat.</p>	<p>Noted. The final layout of the Proposed Development has been designed to minimise the potential for significant effects.</p> <p>Consultation has been undertaken with relevant statutory consultees to discuss Scoping comments in further detail. The scope and approach of all technical assessments have informed by relevant legislation, policy, guidance and industry best practice.</p> <p>Mitigation measures will be discussed in the relevant section of each technical EIA chapter. A full summary of mitigation measures will be provided within the EIA Report in Chapter 15 – Schedule of Commitments.</p>	Chapter 5 – LVIA, Chapter 7 – Ornithology, Chapter 8 – Geology, Hydrology and peat, Chapter 13 – Aviation and Chapter 15 – Schedule of Commitments.
HES	<p>We welcome that the potential heritage effects are scoped into the EIA, however at this stage, the proposed scope of assessment is not sufficient for our needs. Based on the information provided so far, there is potential for significant adverse impacts on heritage assets within our statutory remit.</p>	<p>Noted for EIA. Further consultation has been undertaken with Historic Environment Scotland (HES) to define the appropriate scope of assessment. This consultation helped to confirm to scope and the assessment methodology utilised in the EIA Report.</p>	Chapter 9 – Cultural Heritage.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	Due to an increased demand in consultations, we have not been able to provide detailed comments on specific assets, however please note that we would be keen to engage further as the Proposed Development progresses.		
HES	We welcome that the potential heritage effects are scoped into the EIA, however the applicant references that the Report will be prepared in accordance with the 'Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017'. The applicant should note that this application will be assessed within the context of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.	Noted for EIA and confirmed that application is assessed in line with the Electricity Works EIA Regulations.	Chapter 9 – Cultural Heritage.
HES	Careful consideration should be given to reducing and avoiding impacts on the setting of cultural heritage assets during the design process. Rather than using a specific study area, we recommend that assets at risk of impact should be identified using a 'bare earth' Zone of Theoretical Visibility (ZTV). The EIA chapter should provide an evidential base for the sieving of assets from any subsequent detailed assessment. This sieving exercise should give consideration for assets with long distance views which form part of their cultural significance and should be informed by a robust assessment and appropriate visualisations.	<p>A detailed assessment is included for heritage assets – as identified through Scoping and consultation with HES – as well as any heritage assets for which the effect upon their setting has been predicted to be potentially significant in EIA terms.</p> <p>Designated heritage assets, which the Zone of Theoretical Visibility (ZTV) suggested may have intervisibility with the Proposed Development, were subject to site visits. Consideration was also given to assets outwith the ZTV where turbines may be seen with heritage assets in key views. Where no intervisibility between the heritage asset and the Proposed Development was found, or where there was no view of the asset with the turbines from key locations, the heritage assets have been excluded from further assessment.</p>	Chapter 9 – Cultural Heritage.
HES	We note the applicant proposes to scope out impacts on the setting of designated cultural heritage assets falling outwith the ZTV (paragraph 7.6.4). Please note that views towards an asset can also be an important part of its setting. We therefore again recommend that assessment should be made with reference to our Managing Change in the Historic Environment: Setting guidance, which includes provision for consideration of	Noted for EIA. Consideration has been given to assets outwith the ZTV where turbines may be seen with heritage assets in key views. Where no intervisibility between the heritage asset and the Proposed Development was found, or where there was no view of the asset with the turbines from key locations, the	Chapter 9 – Cultural Heritage.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	both views from the asset, for which the ZTV is key, and views towards the asset. This may necessitate consideration of assets outwith the ZTV.	heritage assets have been excluded from further assessment.	
HES Cultural Heritage	<p>Based on the information provided so far, there is potential for significant adverse impacts on the following heritage assets within our statutory remit.</p> <ul style="list-style-type: none"> – Kilmun Collegiate Church, Tower and Burial Ground (SM5260) – Adam's Cave, Chambered Cairn, Ardnadam (SM6552) – Dunloskin Wood, platforms and charcoal production area (SM3894) – Ardnadam, settlement, chapel & enclosure 215m W of The Larches (SM3235) – Dunoon Castle (SM5450) – Ardgowan House, Inverkip (LB12480) – Ardgowan (GDL00021) – Benmore (Younger Botanic Garden) (GDL00056) – Linn Botanic Gardens (GDL00401) – Castle Toward (GDL00097) <p>The lists should not be treated as exhaustive and is only intended as a reference to those assets which at this stage appear most likely to be impacts.</p>	Visualisations agreed during further consultation with HES and visualisations have been created to the HES requirements.	Chapter 9 – Cultural Heritage
SEPA BESS and Supporting Infrastructure	The plans at present do not show the BESS or any other supporting infrastructure and other requirements such as borrow pits so present an incomplete picture of the proposals.	Plans now show the locations of BESS and supporting infrastructure. Please note that no borrow pits are included as part of this application.	Chapter 3 – Description of Proposed Development.
SEPA Watercourses	The plans at present do not appear to show all watercourses and buffers – and appear to show turbines T5 and T7 within 50 m of a watercourse which would not be acceptable to us.	Noted for EIA. The design has changed and all turbines are now proposed outside of watercourse buffers.	Chapter 3 – Description of Proposed Development and Chapter 8 – Geology, Hydrology and Peat.
SEPA Peat	The plans at present show T7 within Class 1 - Nationally important carbon-rich soils, deep peat and priority peatland habitat. Areas likely to be of high conservation value and T1, T2, T3, T4, T5, T6 and T8 within Class 2 - Nationally important carbon-rich soils, deep peat and priority peatland habitat. Areas of potentially high conservation value and restoration potential.	Noted for EIA. Phase 1 and Phase 2 peat probing has been undertaken, and the results have been considered during detailed design process and detailed within the EIA report. Details of peat probing surveys, peatland condition assessment and potential restoration areas are outlined in Technical Appendix 8.2 – Peat Management Plan.	Chapter 8 – Geology, Hydrology and Peat

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	We will require a peat condition assessment and peat depth survey for the site and would object to any proposed infrastructure on near natural peatland/high conservation value and look for identification of areas with restoration potential.		
SEPA Vegetation	We suggest you go straight to carrying out National Vegetation Classification survey (NVC) survey without carrying out Phase 1.	Noted for EIA. NVC Surveys have been undertaken and information regarding habitat and vegetation surveys, including detailed NVC habitat descriptions, are located within Chapter 6 – Ecology and Technical Appendix 6.2 – Habitats and Vegetation Survey Report.	Chapter 6 - Ecology
SEPA Habitats	Habitat survey information is not required for areas which are heavily forested or recently felled but peat depth information is required.	Noted for EIA. Information regarding habitat and vegetation surveys, including detailed NVC habitat descriptions, are located within this chapter and Technical Appendix 6.2 – Habitats and Vegetation Survey Report. Peat depth data is provided in Appendix 8.1.	Chapter 6 – Ecology and Chapter 8 – Geology, Hydrology and Peat.
SEPA Flooding	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.	Noted for EIA. 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 8.6 of Chapter 8 – Geology, Hydrology and Peat.	Chapter 8 – Geology, Hydrology and Peat
Determining Authority (ECU)			
ECU (10th May 2024)	Scottish Ministers are satisfied with the scope of the EIA set out in the scoping Report.	Noted for EIA. No action required.	Chapter 4 – Approach to EIA.
ECU (10th May 2024)	Ministers are aware that further engagement is required between parties regarding the refinement of the design of the Proposed Development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Noted for EIA. Consultation has been undertaken with relevant consultees to refine the design of the Proposed Development, as well as advice on surveys, assessment methodologies and mitigation. Technical assessments have followed relevant legislation and policy, as well as industry best practice and guidance, to inform the scope and approach of assessments.	Chapter 2 – Site Description and Site Evolution and all EIA Technical Chapters – Chapter 5 – Chapter 13.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
ECU (10 th May 2024) BESS and Infrastructure	<p>The Proposed Development set out in the scoping Report refers to wind turbines, and other technologies including battery storage. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to:</p> <ul style="list-style-type: none"> – The scale of the development (dimensions of the wind turbines, solar panels, battery storage); – Components required for each generating station; and – Minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage. 	<p>Details of the Proposed Development including dimensions, component details and export capacity of the Proposed Development can be found in Chapter 3 – Description of Proposed Development. This chapter provides details of all infrastructure to be included as part of the Proposed Development.</p>	Chapter 3 – Description of Proposed Development.
ECU (10 th May 2024) Construction	<p>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'.</p>	<p>No borrow pits are proposed as part of the application.</p>	N/A
ECU (10 th May 2024) Drinking Water	<p>Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there 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.</p> <p>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</p>	<p>In Scottish Water's Scoping Opinion, they commented that <i>'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'</i>.</p> <p>Drinking Water Protection Areas (DWPA) are covered in the EIA Report. An asset search will be undertaken preconstruction.</p> <p>Argyll and Bute Council were consulted and data provided on Private Water</p>	Chapter 8 – Geology, Hydrology and Peat.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	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.	Supplies (PWS). Those that were accessible were inspected to confirm the source location and source type. This information is outlined in Chapter 8 – Geology, Hydrology and Peat.	
ECU (10th May 2024) Peat	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 Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA Report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	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 8 – Geology, Hydrology and Peat and discussed in full in Technical Appendix 8.1 – Peat Management Plan and Technical Appendix 6.2.- Habitats and Vegetation Survey Report.	Chapter 8 – Geology, Hydrology and Peat.
ECU (10th May 2024) LVIA - Cumulative	The scoping Report identified viewpoints in Section 4 Table 4.1 to be assessed within the landscape and visual impact assessment. Argyll and Bute Council requested additional viewpoints to take into account other windfarms in Cowal and water based viewpoints which can be found in Annex A A5-A6. NatureScot requested additional viewpoints which can be found in Annex A A27-A30. Historic Environment Scotland also provided advice, which can be found in Annex A A22-A25.	Noted for the EIA. For LVIA, all potential wind and energy infrastructure developments within 30km have been taken into account. Consultation with NatureScot and HES has been undertaken to inform the selection of viewpoints. Additional viewpoints have been proposed for the EIA following consultation with NatureScot and HES. The list of viewpoints can be found in both Chapter 5 – LVIA and Chapter 9 – Cultural Heritage.	Chapter 5 – LVIA and Chapter 9 – Cultural Heritage.
ECU (10th May 2024) LVIA – Aviation Lighting	As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 4.4.10 of the scoping Report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.	Noted for EIA. Aviation lighting as a means of mitigation will be considered and proposed within the EIA Report. A total of four night time visualisations will be provided as part of the LVIA.	Chapter 5 – LVIA and Chapter 13 – Aviation.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
		<p>Further, a Night Time Assessment of agreed viewpoints undertaken as part of the LVIA.</p> <p>An Aviation Lighting and Mitigation Technical Report has also been included as part of this application in Technical Appendix 13.1 – Giant's Burn Aviation Lighting and Mitigation Report.</p>	
ECU (10th May 2024) Noise	The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 8.6 of the scoping Report. The noise assessment Report should be formatted as per Table 6.1 of the IOA 'A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise'.	<p>A construction noise assessment at the nearest receptors has been conducted in accordance with BS 5228-1. Operational noise impact assessment has been conducted following ETSU-R-97 and the IOA good practice guidance.</p> <p>IOA 'A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' has been included as part of the assessment.</p>	Chapter 11 – Noise
ECU (10th May 2024) Ornithology	It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds and duration - site specific and cumulative – should be made following discussion between the Company and NatureScot.	<p>Noted for EIA. A full outline of the survey and assessment methodologies utilised in the EIA Report is included within Technical Appendix 7.1 – Ornithology Technical Report.</p> <p>All ornithology survey and assessment work has been undertaken in line with relevant legislation, policy and guidance, as well as industry best practice.</p>	Chapter 7 – Ornithology
Other Consultees			
Aberdeen International Airport (7th March 2024)	This proposal is located outwith the consultation area for Aberdeen Airport. As such we have no comment to make and need not be consulted further.	No response required.	Chapter 13 – Aviation
British Telecommunications (BT) (5th March 2024)	No issues or objections raised.	No response required.	Chapter 14 – Other Considerations
Edinburgh Airport (8th March 2024)	The location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.	No response required.	Chapter 13 – Aviation

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
Fisheries Management Scotland (FMS) (8 th March 2024)	<p>We are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local District Salmon Fishery Board (DSFB)/Trust to any proposal</p> <p>The Proposed Development falls within the district of the Eachaig District Salmon Fishery Board, and the catchment relating to the Argyll Fisheries Trust. It is important that the proposals are conducted in full consultation with these organisations.</p> <p>Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the Proposed Development:</p>	<p>Noted for EIA and guidance will be given full consideration. A response was received from the River Eachaig Fishery Syndicate of the Argyll District Salmon Fishery Board outlining the need for baseline data, in addition to data collection during the construction and operational phases of the Proposed Development.</p> <p>Further consultation will be conducted post-consent.</p> <p>Design and good practice mitigation measures will be included as standard to protect the aquatic environment, including the maintenance of stream habitats and water quality.</p> <p>Good practice mitigation will include appointment of an Ecological Clerk of Works (ECoW) to oversee relevant protection measures and monitoring programmes. It is therefore considered that there are no likely significant effects.</p>	Chapter 6 - Ecology
Glasgow International Airport	<p>The Scoping Report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:</p> <ul style="list-style-type: none"> – The site is outwith the obstacle limitation surfaces for Glasgow Airport. – It is within the radar and instrument flight procedures safeguarding areas and may impact. Detailed assessments will be required. <p>Our position with regard to this proposal will only be confirmed once the turbine details are finalised and we have been consulted on a full planning application. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operational impact and cumulative effects.</p>	Noted for EIA. Glasgow Airport were provided with details of the finalised layout on 13/05/25. Glasgow Airport will comment on the final planning application.	Chapter 13 – Aviation
Glasgow and Prestwick International Airport (21 st March 2024)	The Proposed Development is terrain shielded from Glasgow and Prestwick International Airport's Primary Surveillance Radar(s) and is well clear of all Instrument Flight Procedure profiles, levels and protected surfaces. Consequently, we would have no comment or valid objection to make.	No response required.	Chapter 13 – Aviation

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
Highlands and Islands Airports (20th March 2024)	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	No response required.	Chapter 13 – Aviation
JRC (29 th February 2024)	<p>JRC objects to the Proposed Development due to the siting of turbine/s within 500 m of a microwave link operated by SSEN (SCHY 0959800/1).</p> <p>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.</p> <p>The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.</p>	<p>Noted. JRC were contacted to request coordination so that the relevant turbine/s can be cleared of any potential impact.</p> <p>After consultation, this proposal is *cleared* - subject to 50m Micrositing - with respect to radio link infrastructure operated by the local energy networks.</p>	Chapter 14 – Other Considerations
Kilmun Community Council (3rd July 2024)	All residents, in the hall, online and by proxy voted unanimously to object to Statkraft's proposal to build a windfarm at Giant's Burn on the Cowal Hills. Thus, Kilmun Community Council is taking the lead from our residents will object to the proposal to build a wind farm and Battery Storage facility at Giants Burn.	Noted. No input provided to scoping.	N/A.
Kilmun Community Council (3rd July 2024) Environmental and Wildlife	<p>Environmental and wildlife concerns raised by individual residents at the meeting held 11th June 2024:</p> <ul style="list-style-type: none"> – It is recognised that there are raptors in the area with one habitat for the golden eagle. – The proposed area contains marginal habitats (trees to open area) which is where birds really like as they can shelter in the woodland and hunt in the open. – There are red squirrels (and pine martins) in the area which can be easily displaced. – Cetaceans (dolphins, porpoises, and seals (resident) and visiting whales which are in the Clyde Estuary at present, are very susceptible to noise of the kind of sounds that come from a windfarm. A resident said they would not be surprised that the cetaceans were chased away from the whole of the Upper Clyde area by the noise from the windfarm. – It is recognised that long wave sound will travel 10 times further under water than if it was on land. 	<p>Noted. No pine marten or red squirrel evidence was recorded during the protected species surveys.</p> <p>No records of cetaceans or whales were returned by the 2 km Desk Study, contained within Technical Appendix 6.1 – Desk Study and Legal Policy Context.</p> <p>Noise assessments are contained within Chapter 11 – Noise; however, noise of an onshore windfarm at an altitude over 250 m is not considered to have a likely impact pathway to marine mammals.</p>	Chapter 6 – Ecology, Chapter 7 – Ornithology, Chapter 11 – Noise and Chapter 14 – Other Considerations.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
	<ul style="list-style-type: none"> – Infrasound is regarded a potentially detrimental to physical and mental health. – In conclusion concerns were being raised not only about the turbines but the impact of the whole building and construction process. 		
Kilmun Community Council (3rd July 2024) LVIA	<p>Visual concerns raised by individual residents at the meeting held 11th June 2024:</p> <ul style="list-style-type: none"> – A resident observed that this would be the first thing tourists would see when they visit the area. – The windfarm would have an extremely negative impact of the visual appearance of the landscape from the Loch Lomond and Trossachs National Park and is Gateway to the Highlands. – It was said that the as the area proposed is on the border of the Loch Lomond and Trossachs National Park (Kilmun Community Council boundaries fall within the National Park) and the entire area is very popular with hikers and walkers. All the tourism that is based on walking, hiking, running and biking would be affected by, not only the sight of the windfarm, but also what would be involved with the construction and the entire area will be out of bounds for some time. – The area is a holiday destination because it's natural beauty and has many scenic walks. There are several holiday homes and self-catering properties who contribute to the local economy. Questions were raised about the detrimental effect the proposed wind farm could have on these businesses? – It was stated that people have moved here because of the unspoiled natural beauty and residents are unhappy with the possible visual destruction of their landscape by a foreign state-owned company to produce electricity which will be exported, as Scotland already produces enough for its domestic market. In addition, profits generated would not stay in Scotland. – Most residents were in favour of renewables, but it does depend on the location and that as a previous windfarm planning application was rejected as this was not a suitable site. The difference before and now is that these proposed turbines would be even higher. It has been stated by the Scottish Government that they want "Appropriate renewables in appropriate locations" and the consensus of our community is that the proposed location is not appropriate. 	<p>Noted for EIA. It is understood that the Proposed Development is location in a sensitive location; however, embedded mitigation through design process has been undertaken to inform the final design. In addition to this, relevant capacity studies – ABLWECS, NALWCS and LCSGCV to inform the assessment.</p> <p>Further, Technical Appendix 5.4 – Residential Visual Amenity Assessment (RVAA) has been included to assess potential impacts of the Proposed Development on nearby residential receptors.</p> <p>LVIA VPs have been decided in conjunction with NatureScot to ensure views from key tourist and recreational receptors are assessed.</p> <p>Discourse in the industry shows that there is limited, to no, evidence that wind development negatively impacts on tourism. In 2021, BiGGAR Economics analysed the relationship between onshore wind farm construction and tourism employment at national, regional, and local levels and the report found that despite a significant increase in onshore wind turbines in Scotland, tourism-related employment increased by 20%.</p> <p>This is largely due to the high public support for renewable energy, tourists' expectation of seeing wind farm, especially in rural Scotland and the success factors of tourism not being related to the presence of wind farms.</p>	Chapter 5 – LVIA.

Consultee and Date	Consultee Comments / Issues Raised	Response to Consultee	Where Addressed in the EIA Report
Kilmun Community Council (3rd July 2024) Noise/Shadow Flicker	<p>Concerns regarding Noise/Shadow Flicker raised by individual residents at the meeting held 11th June 2024:</p> <ul style="list-style-type: none"> – Many questions were posed regarding potential noise. What will the noise be like? Are we likely to hear the sound over here (in Kilmun) as well as in Sandbank? What will it be like at night as sound travels more at night when the temperatures are colder. – The problem of low frequency sounds was raised and how this can affect the body and the possibility of infra sound which is lower than human hearing which possibly could be possibly quite injurious. This was felt was an aspect of the windfarm that needed to be investigated. – Concern is about the flicker effect not only for here but from Gourock looking across. This has been an issue in other areas. It can be affected by certain times of the year when the sun is going down and can be seen from several miles away. – As the proposed turbines are to be very high there was concerns raised about the lights which will be on the turbines which will shine through the night and of Flickering lights and a low booming sound. 	<p>Noted for the EIA. A full assessment of potential noise and shadow flicker effects and mitigation associated with the Proposed Development are included in Chapter 11 – Noise and Chapter 14 – Other Considerations.</p> <p>An Aviation Lighting and Mitigation Technical Report has also been included as part of this application in Technical Appendix 13.1 – Giant's Burn Aviation Lighting and Mitigation Report.</p>	Chapter 11 – Noise, Chapter 13 – Aviation and Chapter 14 – Other Considerations.
Kilmun Community Council (3rd July 2024) Transportation	<p>Concerns regarding Transportation raised by individual residents at the meeting held 11th June 2024:</p> <ul style="list-style-type: none"> – Concern was raised about the feasibility of transporting large turbines via the road network to the proposed location. The feasibility of transporting large blades to a site that does not have the infrastructure to do that. The increased use and slow traffic on roads which are not wide, could affect both tourism and the accessibility for the emergency services. – Concern was raised about how often windfarms are being extended after they have been built. 	<p>An Abnormal Indivisible Load Route Survey Report (RSR) is provided as part of the EIA Report in Technical Appendix 11.1 – Abnormal Indivisible Load Route to Site. It identifies key pinch points and swept path analysis where appropriate.</p> <p>It is not planned to apply for an extension of this wind farm. It is not considered that that is adequate space for additional turbines within the site boundary given the constraints on site.</p>	Chapter 10 – Traffic and Transport
Ministry of Defence (MoD) Defence Infrastructure Organisation (DIO)	<p>The MoD has concerns with this proposal due to the potential impact to low flying aircraft operating in the development area.</p> <p>In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 m above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.</p>	<p>The applicant has provided a detailed aviation lighting and mitigation report which will satisfy the requirements of the MOD. This report is included in the EIA in Technical Appendix 13.1 – Giant's Burn Aviation Lighting and Mitigation Report and has been provided to the MOD.</p>	Chapter 13 – Aviation

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	<p>To address the impact up on low flying given the location and scale of the development, the MoD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.</p> <p>The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to Civil Aviation Authority (CAA) requirements, the MoD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MoD accredited aviation safety lighting.</p>		
NATS Safeguarding (12th March 2024)	<p>The Proposed Development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable. NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are:</p> <ul style="list-style-type: none"> – Predicted Impact on Lowther RADAR (T1–T3, T5–T7); – Predicted Impact on Glasgow RADAR (T1–T3, T5–T7); and – An unacceptable impact on Prestwick Centre ATC. 	<p>Noted for EIA. NERL were reconsulted on 13/05/25 and the applicant has been engaged for some time discussing mitigation options. A radar mitigation scheme has been agreed as of 30/05/25 the applicant has been advised to contact the Renewables Team to progress to contract. The applicant continues to engage with NATS and will sign a mitigation contract.</p>	Chapter 13 – Aviation
Office for Nuclear Regulation (14th March 2024)	<p>No comment on this Proposed Development as it does not lie within a consultation zone around a GB nuclear site.</p>	No response required.	Chapter 14 – Other Considerations
River Eachaig Fishery Syndicate (13th March 2024)	<p>The fishery board is no longer active so in the absence of a board view we have consulted Argyll Fisheries Trust and their advice is as follows: Our view is that the proposed layout suggests a low level of threat to the Scoops Burn tributary of the Glenkin Burn and Allt na Chriche tributary. It is possible that brown trout and European eel are present within the site in these burns, and sea trout in the lower Glenkin Burn / Little Eachaig. We therefore suggest that pre (baseline), during and post construction data is collected as per Marine Directorate's guidelines to demonstrate that the fishery has been protected.</p>	<p>Design and good practice mitigation measures will be included as standard to protect the aquatic environment, including the maintenance of stream habitats and water quality.</p> <p>Good practice mitigation will include appointment of an ECoW to oversee relevant protection measures and monitoring programmes. It is therefore considered that there are no likely significant effects</p>	Chapter 6 – Ecology.

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RSPB Scotland Grid Connection	<p>In relation to overhead grid connections, it is important to ensure a feasible route that does not present issues for bird species exists at the earliest possible stage. RSPB Scotland recommends that an indicative route is established and consulted on as soon as possible to enable a full assessment of impacts associated with this wind farm proposal and its connecting infrastructure.</p> <p>We note that this is currently not standard practice for s36 and s37 applications; however, given the increasing pressure across Argyll resulting from onshore wind development and associated grid connection infrastructure, we recommend the Applicant ensures that grid connection has been considered pre-consent as a demonstration of best practice in the sector.</p>	<p>It is noted by RSPB that not currently standard practice for grid connection to be considered within s36 and s37 applications. Even more, the Applicant is not part of the team that develops the grid connection route, that is undertaken by the DNO and therefore the Applicant does not have information that can be considered at this stage.</p>	N/A
RSPB Scotland (14th March 2024) Ecology	<p>It is positive that the Applicant proposes to deliver positive effects for biodiversity through a Habitat Management Plan (HMP); however, RSPB Scotland recommends that outline plans are provided for stakeholder consideration at Application. In particular, we would wish to see detail of how it is proposed to mitigate the loss of open ground habitats within the red line boundary, and what biodiversity enhancement activities are proposed in addition to this mitigation. A HMP area should be identified as early as possible in the consultation/application process. Given the requirement in NPF4 to deliver biodiversity enhancement, the Applicant should ensure the feasibility of proposed enhancement activities in terms of land availability and land suitability for measures to support target habitats and species prior to consent, with inclusion of key information as outlined in NatureScot guidance.</p> <p>RSPB Scotland notes that commercially afforested land immediately north, northeast and along the northwestern edge of the red line boundary have Very High/High Opportunity for Rainforest restoration under Plantlife Scotland's Rainforest Opportunity model.</p> <p>We would welcome further discussion and information from the Applicant as to how it will be ensured that policy requirements under NPF4 are met for the Proposed Development.</p>	<p>A Biodiversity Strategy is included as Technical Appendix 6.5 – Biodiversity Enhancement strategy of the EIA Report. Opportunities for Atlantic temperate rainforest have been considered when designing mitigation, enhancement and restoration proposals in the BES.</p> <p>An outline Bird Protection Plan (BPP) is presented within Chapter 7 – Ornithology (see Best Practice Measures) and committed to as embedded mitigation.</p> <p>Access has been requested to the Plantlife Scotland Rainforest Opportunity Model and, if made available, this will be used in developing the detailed proposals of the Biodiversity Enhancement Plan (BEP) post-consent.</p>	Chapter 6 - Ecology and Chapter 7 - Ornithology

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RSPB Scotland Ornithology	RSPB Scotland would welcome inclusion of an outline Bird Protection Plan as early as possible in the consultation/application process, to safeguard breeding/roosting raptors and other priority species that might move into potential disturbance distance during construction, operation or decommissioning of the Proposed Development. This plan should then be finalised and agreed with NatureScot as a planning condition.	Noted for EIA. Consultation will be undertaken with NatureScot and RSPB to finalise Bird Protection Plan. An outline Bird Protection Plan (BPP) is presented within Chapter 7 – Ornithology (see Best Practice Measures) and committed to as embedded mitigation. Access has been requested to the Plantlife Scotland Rainforest Opportunity Model and, if made available, this will be used in developing the detailed proposals of the Biodiversity Enhancement Plan (BEP) post-consent.	Chapter 7 – Ornithology.
Scottish Water (13th March 2024) Drinking Water	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. No action	N/A
Scottish Water (13th March 2024) Sewage	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.	Noted for EIA. No surface water connections into Scottish Water's combined sewer system will be made.	Chapter 8 – Geology, Hydrology and Peat
ScotWays (16th April 2024)	In searching our records at this scoping stage, we have focussed solely on the immediate area of the proposed application. If required by the applicant to inform their EIA, maps of a wider search area are available, alongside a more detailed response.	Noted for EIA. Further consultation was undertaken with Scotways on 16 th of June 2025 to discuss public access on Site and in the immediate area. Any potential impacts on recreation are included in Technical Appendix 10.2 – Outdoor Access Management Plan (OAMP).	Chapter 10 – Traffic and Transport
ScotWays (16th April 2024) Paths and Public Rights of Way	It is our understanding that there is very little guidance regarding the siting of turbines in relation to established paths and rights of way, so we use the following starting	Noted for EIA. Turbines have been sited a minimum distance of blade tip height plus	Chapter 3 – Description of Proposed Development.

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	<p>principle in considering what could be reasonable: "a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line."</p> <p>ScotWays is likely to object to any proposal where the above principle is not followed, including where a micro-siting allowance could lead to turbine encroachment upon a route because it has been insufficiently buffered.</p>	10% (220m) from any public road or right of way.	
ScotWays (16th April 2024) Recreation	As well as direct impacts of development upon public access, ScotWays has an interest in impacts on recreational amenity, so this includes the impact of wind farm development on the wider landscape. We anticipate that the applicant will take into account both recreational amenity and landscape impacts in developing their proposals for this site. We will consider these issues further should this scoping stage lead to a planning application.	Noted for EIA. Chapter 5 – LIVA includes an assessment of the Proposed Development on residential amenity, including core paths within the Site and surrounding area.	Chapter 5 - LVIA
ScotWays (16th April 2024) Recreation	<p>At present this recreational baseline is incomplete as it only relates to core paths: there appears to have been no consideration of rights of way or other recreational routes, as shown on our enclosed maps, within the vicinity of the Proposed Development. In addition to the recreational receptors already identified in the Scoping Report rights of way should be included in the scope of the assessment.</p> <p>It should be noted that recorded right of way SA37 sits in closer proximity to the Proposed Development than do the Argyll and Bute core paths.</p>	<p>Noted for EIA. Further consultation was undertaken with Scotways on 16th of June 2025 to discuss public access on Site and in the immediate area.</p> <p>Any potential impacts on recreation are included in Technical Appendix 10.2 – OAMP. This outlines mitigation measures that should be implemented during the different phases of the Proposed Development. A final OAMP will be written in conjunction with the Council Principal Contractor, Transport Officers and Access Officers.</p>	Chapter 4 – Approach to EIA
Transport for Scotland (20th March 2024) Transport	<p>We would note that new guidance has been published by the Institute of Environmental Management and Assessment (IEMA).</p> <p>These Guidelines, entitled Environmental Assessment of Traffic and Movement (July 2023), are intended to update and replace the previous 1993 IEMA guidelines and provide enhanced and up to date advice on the assessment of traffic and movement. Transport Scotland would request that the thresholds as indicated within these new Guidelines be used as a screening process for the assessment</p>	<p>The updated Environmental Assessment of Traffic and Movement (July 2023) guidance has been implemented for the EIA.</p> <p>Noted. The appropriate data sources from have been utilised for the purposes of the traffic and transport assessment.</p>	Chapter 10 – Traffic and Transport

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	Transport Scotland would also state that a source of base traffic data is Traffic Scotland's National Traffic Data System. It should also be noted that base traffic flows will require to be factored to the peak construction year, using National Road Traffic Forecasts (NRTF) Low Growth.		
Transport for Scotland (20th March 2024) Abnormal Loads	A full Abnormal Loads Assessment Report should be provided with EIA REPORT that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route. We would also add that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager(s) prior to the movement of any abnormal load.	An Abnormal Indivisible Load Route Survey Report (RSR) is provided as part of the EIA Report in Technical Appendix 11.1 – Abnormal Indivisible Load Route to Site. It identifies key pinch points and swept path analysis where appropriate. Details will be discussed with the most appropriate Area Manager post-consent.	Chapter 10 – Traffic and Transport