SNH website has a summary of the legislative requirements - https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal/habitats-regulations-appraisal-hra-appropriate

Given the separation distance between the proposed development site and the SAC we agree with the conclusions in the scoping report that the upland and freshwater habitat features of the SAC are not hydrologically linked to the proposed development and can be scoped out of the EIA.

However, otter are a mobile species and Section 6.3 *Sensitive Receptor*s of the scoping report states that "*the wide ranging nature of otter territories means that individuals associated with the SAC could potentially forage and/or commute along watercourses within the site*". This suggests to us that there is a connection between the application area and the SAC.

Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions of the scoping report confirms that an otter survey will be undertaken "*Up to 200m upstream and downstream of watercourse access crossing locations and within 200m from each wind turbine location*".

In our view, at present there is insufficient information to determine whether the proposal is likely to have a significant effect on the otter qualifying interest of Merrick Kells SAC. Therefore we reserve full judgement on any impacts on otter until we have considered the full otter survey findings. Following the survey the applicant should consider whether the proposal is likely to have a significant effect on the otter qualifying interest and, if there is, provide sufficient information to inform an appropriate assessment in view of the site's conservation objectives for its otter qualifying interest.

Merrick Kells Site of Special Scientific Interest (SSSI)

Merrick Kells SSSI is of national importance, shares a similar boundary to the SAC and its designated features include blanket bog habitat, the blue aeshna dragonfly (*Aeshna caerulea*), an assemblage of beetles, a breeding bird assemblage, upland habitats and geological interests. Information on the SSSI can be found on the SiteLink pages of our website: https://sitelink.nature.scot/site/1148

We agree with the conclusions in the scoping report that there is no connectivity between this SSSI and the proposed development site and that Merrick Kells SSSI can be scoped out of the EIA.

Auchalton SSSI

The proposed wind farm site lies, at the closest point, approximately 1.5km from Auchalton SSSI, which is of national importance and is designated for lowland neutral grassland. Information on the SSSI can be found on the SiteLink pages of our website: https://sitelink.nature.scot/site/96

We agree with the conclusions in the scoping report that there is no connectivity between this SSSI and the proposed development site and that Auchalton SSSI can be scoped out of the EIA.

Bogton Loch SSSI

The proposed wind farm site lies, at the closest point, approximately 10km from Bogton Loch SSSI, which is of national importance and its designated features include open water transition fen and an assemblage of breeding birds. Information on the SSSI can be found on the SiteLink pages of our website: https://sitelink.nature.scot/site/240

We agree with the conclusions in the scoping report that there is no connectivity between this SSSI and the proposed development site and that Bogton Loch SSSI can be scoped out of the EIA.

Further designated sites

Section 2.2 "*Site Description*" of the Scoping report highlights other (geological) statutory designated sites within 5km of the proposed development, such as Knockgardner SSSI and Blair Farm SSSI. We do not consider that either of these sites are connected to the development site. Therefore we are satisfied that they do not require further consideration and can be scoped out of the EIA.

Statutory Protected Species – general

A number of protected species may be present and impacted by the development proposals. We advise that species surveys should have been completed no more than 18 months prior to submission of the application, to ensure that the survey results are a contemporary reflection of species activity at and around the site.

Details of species and associated legislation can be found on our website at https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species/legal-framework It is important that any licensing issues are fully established as part of the planning application. This is to avoid a situation where planning permission is secured but the lack of a species licence prevents the development from proceeding.

Full details of survey methodologies, areas surveyed and details of any limitations to survey efforts should be included within the Environmental Statement.

The ES should also report the survey results including figures showing the survey areas/results with infrastructure/turbine layout overlapping, evaluate impacts predicted to arise as a result of the development proposals, assess the significance of these impacts and recommend mitigation and/or compensation measures as is necessary and appropriate.

Where survey methods or other work deviates from published guidance, deviations should have been agreed in writing with SNH in advance of carrying out survey work. A full description of the methodology used should be provided in the ES (technical appendices should be used for this where appropriate), along with an explanation of why any deviations are considered appropriate.

European Protected Species

Otters

Section 6.3 *Sensitive Receptors* of the scoping report confirms that Linfern Loch and watercourses present within the site, including tributaries associated with the River Stinchar and Water of Girvan, and adjacent terrestrial habitat could potentially be used by otter. As detailed above these otter could potentially be associated with Merrick Kells SAC.

Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions of the scoping report confirms that an otter surveys will be undertaken "*Up to 200m upstream and downstream of watercourse access crossing locations and within 200m from each wind turbine location*".

If this survey work finds that otter could be affected by the proposal an otter protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our recently published species guidance note for otters that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements – https://www.nature.scot/species-planning-advice-otter

Bats

Bat Roost Surveys

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the woodland habitat on site and a small number of buildings immediately surrounding the site could be utilised by roosting bats. Table 6.1 of the scoping report confirms that surveys to identify roosting features for bats will be undertaken.

We advise that if any suitable roosting sites are identified then further survey work to identify presence or absence, species, numbers, roost function and flightlines should be undertaken prior to the submission and determination of any planning application for this proposal.

We further advise that if any bat roosts are found to be present a bat protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our species guidance note for bats that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements – https://www.nature.scot/species-planning-advice-bats

Bat Activity Surveys

As detailed in section 6.2 *Baseline Conditions* of the scoping report "*Bat activity surveys commenced at the site in autumn 2019 and are programmed to continue over the spring and summer periods of 2020. Results from activity surveys undertaken in the autumn of 2019 confirmed the presence of five species; common pipistrelle, soprano pipistrelle, brown long-eared, Natterer's and Daubenton's bats, of which soprano pipistrelle bats were the most commonly recorded*". We note from Table 6.1 that these surveys are being undertaken in line with our *Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation* guidance (2019) https://www.nature.scot/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation which we support.

As the layout of the turbines has not yet been decided we note that bat detectors have been deployed across representative habitat throughout the site. It's not clear at this stage at what height the detectors have been placed.

Given that the turbines are likely to be key-holed, positioning of the automated detectors is important, but likely to be constrained by the existing pattern of tree cover. In practice this is likely to mean that detectors will be placed in forest rides/fire-breaks. This is likely to replicate where the majority of bats such as pipistrelles are currently concentrating their foraging, i.e. along forest edges.

However, *Nyctalus spp.* are much less constrained in this way and may be foraging over a wide area above the tree canopy, in which case ground-based detectors may miss some of their calls. Therefore, we recommend that if there are any met masts available on site they should be used for at-height monitoring, in line with the SNH guidance.

We appreciate that Covid-19 restrictions may have affected the proposed spring/summer 2020 bat surveys and we may make specific comment on the survey work once full details are available to us. Any deviations from published guidance during the course of survey work should be fully explained and justified in the ES.

With regards to mitigation for bats, as a minimum, we would expect turbines to be located where no part of their structure or blades should fall within 50m of the nearest building, tree or hedgerow in line with Natural England's Bats and onshore wind turbines Interim guidance Technical Information note TIN059 http://publications.naturalengland.org.uk/publication/35010 We may recommend further mitigation measures once we have considered the full survey results.

In line with our guidance we encourage the applicant to submit the static automated bat detector data for this proposal to the secure online tool *Ecobat* https://www.mammal.org.uk/science-research/ecostat/ This is likely to provide the most objective assessment of activity on which to base any further mitigation recommendations.

Great crested Newt (GCN)

Section 6.3 *Sensitive Receptors* of the scoping report confirms that habitats on site provide potential breeding and foraging habitat for amphibian species, including great crested newts (GCN) and Table 6.1 of the scoping report states that Forestry and Land Scotland (FLS) hold positive eDNA records of GCN within the proposed development site.

Table 6.1 *Summary of Surveys to Inform the Ecological Baseline Conditions* of the scoping report confirms that "*All ponds and other small waterbodies within at least 250m of turbines and access tracks*" will be subject to a combination of habitat suitability assessment, eDNA sampling and presence/absence surveys.

In line with our guidance note for great crested newts – https://www.nature.scot/species-planning-advice-great-crested-newt we recommend that this survey work should extend to 500m from any proposed infrastructure.

If this survey work finds that great crested newts could be affected by the proposal a great crested newt protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

Nationally Protected Species

Water voles

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the site contains several drains, ditches and burns potentially utilised by water vole and *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* of the scoping report confirms that a search for signs of water vole will be undertaken "*Up to 200m upstream and downstream of watercourse access crossing locations and within 200m from each wind turbine location*"

If water vole and their habitat could be affected by the proposal a water vole protection plan should be prepared. If the implementation of mitigation measures is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our species guidance note for water voles that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements – https://www.nature.scot/species-planning-advice-water-vole

Badgers

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the site contains potentially suitable habitat for badgers, including for sett excavation and *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* confirms that a badger survey is proposed "*within at least 100m of each wind turbine location and along the access tracks*".

If this survey work finds that badger could be affected by the proposal a badger protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our recently published species guidance note for badgers that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements: https://www.nature.scot/species-planning-advice-badger

Red Squirrel

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the site contains coniferous woodland habitat that could be used by red squirrel for shelter and foraging. *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* confirms that a red squirrel survey is proposed to be undertaken "*within at least 100m of each wind turbine location and along the access tracks, including rocky outcrops*".

If this survey work finds that red squirrel could be affected by the proposal a red squirrel protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our guidance note for red squirrel that brings together all the latest information and advice, including legal protection, survey methods, mitigation measures and licensing requirements: https://www.nature.scot/species-planning-advice-red-squirrel

Pine Marten

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the site contains coniferous woodland habitat that could be used by pine marten for shelter and foraging. *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* confirms that a pine marten survey is proposed to be undertaken "*within at least 100m of each wind turbine location and along the access tracks, including rocky outcrops*".

Therefore if this survey work finds that pine marten could be affected by the proposal a pine marten protection plan should be prepared. If the implementation of the identified mitigation measures within this plan is not sufficient to avoid offences under protected species legislation, a licence will be required from SNH before the works can proceed.

We refer the applicant to our species guidance note for pine marten that brings together all the latest information and advice, including legal protection, survey methods, and mitigation measures and licensing requirements: https://www.nature.scot/species-planning-advice-pine-marten

Fish and Freshwater Pearl Mussel (FWPM)

Section 6.3 *Sensitive Receptors* of the scoping report confirms that the site crosses watercourses connected to Linfern Loch, River Stinchar and the Water of Girvan which may support Salmonid species. *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* of the scoping report confirms that "*all watercourses crossed by access tracks and within up to 200m of each wind turbine*" have been subject to survey work to assess habitat suitability in line with Scottish Fisheries Coordination Centre (SFCC) (2007) and updated guidance on the SFCC website.

Section 6.5 *Issues Scoped-Out* of the scoping report states that based on "*information obtained in the desk study and observations made during the fish habitat suitability assessment, it is not anticipated that freshwater pearl mussels will be present to pose a*

constraint to the Proposed Development. No construction activities associated with the Proposed Development will occur within 10m of watercourses or waterbodies and appropriate mitigation measures will be adopted to protect watercourses."

Without knowing the final layout of the proposed infrastructure and without having seen the fish habitat suitability assessment survey results we are unable to advise on whether we agree with these conclusions regarding FWPM.

In line with our "general pre-application/scoping advice to developers of onshore wind farms" https://www.nature.scot/professional-advice/planning-and-development/renewable-energy-development/types-renewable-technologies/onshore-wind-energy/general-advice-wind-farm where there is suitable habitat for freshwater pearl mussel, and particularly where salmonids are present, we would expect a freshwater pearl mussel survey to be carried out following our guidance https://www.nature.scot/plants-animals-and-fungi/invertebrates/freshwater-invertebrates/freshwater-pearl-mussel The only exceptions for this would the Borders, Lothian and some parts of Fife where freshwater pearl mussel are unlikely to be present.

Where the proposed development site has permanent watercourses or water bodies in it or connected to it, you should seek advice from SEPA regarding water crossings and the adequacy of any hydrological work undertaken as part of the EIA.

Deer

We recommend that if deer are present on or will use the development site, an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (e.g. access and recreation, road safety, etc.) should be presented. If the development would, or could, result in significant impacts, a draft deer management statement should be provided, setting out how the impacts will be addressed. There's advice on this in SNH's Guidance "*What to consider and include in deer assessments and management at development sites*", which is available on our website at: https://www.nature.scot/guidance-planning-and-development-what-consider-and-include-deer-assessment-and-management

Ornithology

Having reviewed the ornithology chapter of the scoping report we note that our previous ornithology comments/advice have been taken on board.

Within ornithology section 7.2 *Covid-19 Pandemic* of the scoping report we note that the applicant highlights that "*Due to site access limitations associated with the global Covid-19 pandemic, all surveys scheduled in early to mid-April had to be postponed and rescheduled to late April and early May*" and with regards to breeding osprey (and other target ornithology species) it may not be possible to establish an accurate return date for the osprey breeding pair in 2020.

We appreciate that the Covid-19 restrictions will have affected the Year 2 ornithology surveys and we may make specific comment on the ornithology survey work once full details are available to us. Any deviations from published guidance during the course of survey work should be fully explained and justified in the ES.

Wider Countryside/Nesting birds

Our advice with regards to breeding birds is that the following mitigation is required to minimise the impact of the development.

- Ground or vegetation clearance works should be undertaken out with the main bird nesting season (March-August inclusive). If this is not possible, a suitably experienced ecologist should check the development site before work commences to determine the presence of any nesting birds. If nesting birds are found, a suitably sized buffer zone should be set up around the nest and no work within this zone should commence until the young have fledged

or the nest is no longer in use. This will ensure that no nests are destroyed during the site construction works and no offences are committed under the Wildlife and Countryside Act 1981 (as amended).

If the development is not carried out in accordance with this mitigation measure, the applicant may risk committing an offence.

Habitats

We note from section 2.2 "*site description*" of the scoping report that the site is described as predominantly commercial forestry and rough grazing. *Table 6.1 Summary of Surveys to Inform the Ecological Baseline Conditions* confirms that a National Vegetation Classification (NVC) survey will be undertaken "*within 250 of each wind turbine location, access routes and borrow pits*". We recommend that the ES should include a map of the NVC survey results with the wind farm boundary, proposed turbines, tracks and infrastructure layout overlapping. Records of any rare or scarce plant species recorded within the site should also be included within the ES.

As detailed in section 13.2.2 *Baseline Conditions* of the scoping report we note that the site is located within Carrick Forest, which is owned by Scottish Ministers and managed by Forestry and Land Scotland (FLS) as part of the National Forest Estate (NFE). As felling will be required for this development, we recommend continued consultation with FLS regarding requirements for compensatory planting according to the Scottish Government's policy on the control of woodland removal available via https://forestry.gov.scot/publications/349-scottish-government-s-policy-on-control-of-woodland-removal-implementation-guidance/download

Peat

The proposed Carrick Wind Farm site includes areas mapped as 'Class 1' on SNH's Carbon and Peatland map 2016, see https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/soils/carbon-and-peatland-2016-map Class 1 areas are nationally important carbon-rich soils, deep peat and priority peatland habitat and are likely to be of high conservation value.

While Scottish Planning Policy identifies such areas as 'areas of significant protection', a proposal located in the mapped area would not, in itself, mean that the proposal is unacceptable, or that carbon rich soils, deep peat and priority peatland habitat would be adversely affected. However the proposal will need to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

The scoping report confirms that peat probing will be undertaken prior to the EIA submission to establish presence and depth of peat. We advise that detailed peat surveys of the site, measuring the peat deposit to full depth, should be undertaken in accordance with Scottish Government guidance (see https://www.gov.scot/publications/peatland-survey-guidance/). The probing results should be used to inform the proposed Peat Stability Risk Assessment (PSRA).

We recommend that peat survey results should be used to inform the design and layout process, so that the development avoids, where possible, fragile and priority habitats and other sensitive areas e.g. blanket bog and peat. Where this is not possible, suitable restoration and/or compensation measures should be presented in the EIA Report in the form of a draft Habitat Management Plan (HMP). HMPs should follow our guidance on "*What to consider and include in Habitat Management Plans*" available via https://www.nature.scot/guidance-planning-development-what-consider-and-include-habitat-management-plans We recommend that the HMP for this site should tie in with any relevant bog (and other) habitat restoration proposals for nearby sites in the area.

We welcome the proposed Soil and Peat Management Plan (SPMP) and recommend that the applicant should consult with SEPA regarding excavated peat reuse and disposal.

Concluding remarks

Please see our detailed comments on the targeted questions, listed at the end of each scoping report chapter in the Annex. Please note that while we are supportive of the principle of renewable energy, our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is submitted as a formal application.

Should you have any queries about this letter, in the first instance, please contact me at [redacted]

Yours sincerely

REDACTE
D
[redacted]
Operations Officer
Strathclyde & Ayrshire

Annex – Scoping Report Questions – SNH comments:

Chapter 5. Landscape and Visual

Question 1: Do you agree with the Landscape and Visual proposed approach for baseline collection, prediction of effects and significance assessment?

Yes we note that the proposed assessment will be carried out in accordance with 'Guidelines for Landscape and Visual Impact Assessment: Third Edition' (Landscape Institute and IEMA, (2013) ('GLVIA3').

Question 2: Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, including cumulative effects?

See above

Question 3: Are the proposed viewpoint locations acceptable, including for night-time assessment?

The scoping report seems to provide a reasonable spread of viewpoints. However the final list of viewpoints is the responsibility of the applicant's landscape consultant and each should be micro-sited to show the worst case scenario. We reserve the option to request additional viewpoints as the application progresses should we consider it necessary.

We suggest that a further viewpoint location is investigated on Arran from where the turbines might be seen in the foreground of views to the high tops of the Merrick WLA. We also suggest that a photomontage is produced for the Merrick VP 15, as a photograph will more clearly show the wild land context of this important viewpoint when looking along the ridge towards the proposed turbines.

We would welcome clear numbering of all turbines on at least one visualisation for each viewpoint. We suggest that forestry felling is shown in the visualisation for Shalloch on Minnoch as this high level viewpoint looks down into the site.

The three proposed night time lighting viewpoints are reasonable for lower level assessment. However there should also be at least one viewpoint within the WLA from which a lighting assessment is carried out. We advise that Shalloch on Minnoch would be a key viewpoint for a night time lighting assessment as all the turbines would be visible from here to their (almost) full extent. The Merrick, Macaterick and/or Mullwharchar should also be considered. However we are happy to discuss alternative viewpoints which could clearly represent the likely impact on the northern and north eastern parts of the WLA.

The night time lighting photomontages should also clearly show lighting at relevant existing and proposed wind farms in the cumulative baseline including Clauchrie and Arecleoch Extension wind farms. Where co-located technologies have a requirement for lighting we request that this is clearly indicated on the night time lighting images where relevant.

Question 4: Are there any other scoping or in planning wind farm sites, in addition to those illustrated, to consider as part of the cumulative assessment?

The relevant local authorities should be able to provide up-to-date list of projects.

Question 5: Has the consultee identified any further landscape or visual receptors to be considered within the assessment (e.g. where potential significant effects may occur)?

Not to date.

Question 6: Do you agree with the landscape and visual receptors proposed to be scoped-out?

We do not agree that night time effects on landscape character should be scoped out (scoping report para 90). People's perception of wildness and wild land qualities can be enhanced and strengthened at night. Therefore if wildness is a characteristic of a particular LCT then the effects of aviation lighting on the landscape character should be assessed.

Question 7: Are there any other relevant consultees who should be consulted with respect to the LVIA?

N/A

Question 8: Do you have any comments on Wild Land Assessment, noting further consultation is required on its inclusion?

We agree that the wild land assessment is likely to focus on the northern part of the WLA but advise that this should be presented in the context of the WLA overall, with all qualities considered at the outset. We welcome the proposal to follow SNH's 2017 Draft 'Assessing Impacts on Wild Land Technical Guidance'.

The wild land assessment should include an assessment of lighting on the wild land qualities. The 17 pairs of red turbine lights would be new, incongruous and dominant focal points in the darkness clearly representing contemporary, human artefacts and activity. The proposal could greatly diminish the wild land experience sought by those who walk into the hills before dawn and those who intentionally stay on the hills after dark to encounter the sunset and dark skies within the Merrick WLA.

We note the reference to 'transitional areas' of the WLA and clarify that whilst there will be parts of the WLA where qualities are less well expressed this is not a helpful expression.

Please also see the landscape advice provided in our recent (28/5/20) response to the section 36 Application for Clauchrie wind farm, which should be available under reference no: ECU00002001 on the Energy Consents website at: https://www.energyconsents.scot/Default.aspx

Chapter 6. Ecology

Question 9: Do you agree with the Ecology proposed approach for baseline collection, prediction of effects and significance assessment?

In relation to the ecology surveys proposed for this development on the basis of the information provided we are broadly content with the proposed approach (see our advice in the covering letter). While the survey work is therefore likely to be sufficient to inform the EIA, we reserve full judgement until we have considered the full survey findings.

The applicant should be aware that we may make specific comment on the survey work once full details are available to us. Any deviations from published guidance during the course of survey work should be fully explained and justified in the ES.

Chapter 7. Ornithology

Question 10: Do you agree with the Ornithology proposed approach for baseline collection, predication of effects and significance assessment?

We have previously provided pre-application advice to Arcus Consultancy Services in relation to ornithology baseline surveys for this proposal in a letter dated 22 February 2019 and e-mails dated 23 July 2019 and 6 February 2020. Having reviewed the ornithology chapter of the scoping report we agree that the range of surveys undertaken to date and

ongoing surveys is likely to be sufficient to inform the EIA. However, we reserve full judgement until we have considered the full ornithology survey findings.

The applicant should be aware that we may make specific comment on the ornithology survey work once full details are available to us. Any deviations from published guidance during the course of survey work should be fully explained and justified in the ES.

Chapter 9. Hydrology, Hydrogeology, Geology and Peat

Question 12: Do you agree with the Hydrology, Hydrogeology, Geology and Peat proposed approach for baseline collection, prediction of effects and significance assessment?

On the basis of the information provided we are broadly content with the proposed approach in relation to Hydrology, Hydrogeology, Geology and Peat. While the survey work and assessment is therefore likely to be sufficient to inform the EIA, we reserve full judgement until we have considered the full survey findings.

The applicant should be aware that we may make specific comment on the survey work once full details are available to us. Any deviations from published guidance during the course of survey work should be fully explained and justified in the ES.

The Coal Authority
Resolving the impacts of mining

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E: planningconsultation@coal.gov.uk
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For the attention of: [redacted]
Energy Consents
Directorate for Energy and Climate Change
Scottish Government

[By email: Econsents_Admin@gov.scot]

29 May 2020

Dear [redacted]

REFERENCE: EC00002063

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CARRICK WIND FARM

Thank you for your notification of 13 May 2020 seeking the views of the Coal Authority on the above scoping opinion.

I have checked the application boundary (Figure 1.1) against our coal mining information and can confirm that the proposed development site is located outside of the defined coalfield.

Accordingly, the Coal Authority has no comments or observations to make on this proposal.

In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the Project. This letter can be used as evidence for the legal and procedural consultation requirements.

Please do not hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

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Planning & Development Manager

Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available coal mining data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

Development Management and Strategic Road Safety
Roads Directorate

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: REDACTED , Fax: REDACTED
[redacted]

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

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Energy Consents Unit
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econsentsadmin@gov.scot

Your ref:
EC00002063

Our ref:
TS00538

Date:
28/05/2020

Dear Sirs,

ELECTRICITY ACT 1989

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

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR CARRICK WIND FARM

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Scottish Power Renewables in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

We understand that Scottish Power Renewables (SPR) are seeking consent for a wind farm comprising up to 17 wind turbines with a maximum height to blade tip of 200m located within the north of Galloway Forest Park in South Ayrshire. The nearest trunk road to the site is the A77(T) which lies approximately 14km to the west.

We note that the site is located within an area which has several existing and proposed windfarm developments, including Hadyard Hill Windfarm which is approximately 3.6km to the west and Dersalloch Windfarm which is approximately 3.5km to the north-east. Clauchrie Windfarm which was submitted to planning in December 2019 is located approximately 3.5km to the south west.

Traffic and Transport

The issues of traffic and transport are dealt with in Chapter 11 of the SR. This states that the developer will seek to utilise routes previously used for operational windfarms in the vicinity of the proposed development for both general construction traffic and abnormal load movements.

We note that baseline traffic flow data will be obtained from the Department for Transport (DfT) and/or South Ayrshire Council for the most recently available period (2018). We would also refer SPR to Traffic Scotland's National Traffic Data System as a potential source of traffic data (https://ntds.trafficscotland.org/).

The study area has been identified as follows:

- U52W between the A75(T) and A714 at Newton Stewart;
- A714 – between the A75(T) and the C46W at Bargrennan;
- B741 – between the A77(T) and the B741 at Dailly;
- B741 – between the B741 at Dailly and B7045 at Straiton;
- B741 – between the A713 and B741 at Straiton;
- B7023/ Dalhowan Street – between the A77(T) and the B741; and
- C46W/ Unnamed road through to the proposed site access.

The SR states that environmental impacts associated with increased traffic such as driver delay, pedestrian amenity, severance, safety etc will be considered and assessed where appropriate (i.e. where Institute of Environmental Management and Assessment Guidelines for further assessment are breached). These specify that road links should be taken forward for assessment if:

- Traffic flows will increase by more than 30%, or
- The number of HGVs will increase by more than 30%, or
- Traffic flows will increase by 10% or more in sensitive areas.

Transport Scotland is satisfied with this approach, but would add that potential trunk road related environmental impacts should be considered and mitigated where appropriate.

We note that further assessment of the traffic impacts during the operational phase is not considered necessary, and it is proposed to scope this out of the forthcoming Environmental Impact Assessment Report (EIAR). This is considered appropriate in this instance.

Abnormal Load Assessment

The SR states that access for turbine components could be taken from a number of ports of entry such as Glasgow KGV Docks or Cairnryan. We understand, however, that there are limitations on the size of components that Cairnryan can accommodate and, as such, consideration would be given to this during the route assessment works and as part of the Traffic and Transport chapter within the EIAR. The SR indicates that a detailed route assessment has already been undertaken from Glasgow KGV Docks.

The proposed access route for inclusion within the Traffic and Transport chapter is as follows:

- Glasgow KGV Docks;
- Kings Inch Drive;
- M8;
- M74/M6;
- A75(T);
- U52W;
- A714;
- C46W; and
- Site Road.

We would add that Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path.

A full Abnormal Loads Assessment report should, therefore, be provided with the Environmental Impact Assessment Report (EIAR) 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.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or Alan DeVenny at SYSTRA's Glasgow Office on REDACTED

Yours faithfully

REDACTED

[redacted]

Transport Scotland
Roads Directorate

cc [redacted]

Carrick Forest Wind Farm Scoping Report Responses from Crosshill, Straiton and Kirkmichael Community Council

We welcome the opportunity to be involved in the early stages of the Proposal as it located within our area and has impacts on our residents, the landscape, wildlife and many other aspects.

Chapter 5 Landscape and Visual

1 Do you agree with the Landscape and Visual proposed approach for baseline collections, prediction of effects and significance assessment?

5.3.2. As well as the 4 listed landscapes the Southern Ayrshire & Galloway Biosphere should be included. Although it is a non-statutory designation with no formal planning status it is a very important landscape area. It was the first UNESCO Biosphere in Scotland and *"has been recognised internationally as a world class environment for people and nature."* The Proposed Development would be in the Buffer Zone of the Biosphere. More emphasis should be placed on importance of UNESCO Biosphere status and the criteria for Biosphere should be included in Scoping.

5.3.3. Forestry/trees should not be used as screening visibility as they are not fixed features of the landscape. Do not agree with the study area being reduced from 45km to 30km radius, particularly given the height of the turbines.

5.5.2 Preliminary work shows that the indicative layout would not be visible from Culzean Castle or its surroundings. If the layout alters and it is visible from any part of Culzean Castle and Park then Culzean Castle Garden and Designated Landscape should not be scoped out.
Other designated landscapes in the vicinity have been omitted and should be included.

5.7.1 Surveys are being conducted at Keirs Hill. Scoping Report now available for Craiginmoddie which is on the former Hadyard Hill Extension. This would adjoin the proposed Carrick Forest development.

5.7.2 Residential Visual Amenity should include the gardens and surrounding land (curtilage) not just the view from inside the house. This is recommended by Residential Visual Amenity Assessment (RVAA) 2019 (1.1 *'the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage'*.) Given the height of the proposed turbines all residential receptors within 5km should have detailed assessment of potential visual effects. If this includes a village then a selection of houses should be assessed.

5.7.3 The Merrick Area of Wild Land should not be scoped out. It is very close to the Proposal and would have significant impacts.

5.7.4 Any lighting on turbines is going to interfere with people's enjoyment of the night skies. Particularly important out in the country where there are no street lights to impair the experience. In addition lighting on the turbines could affect the Gold Tier Dark Sky Status of the Galloway Dark Sky Park therefore the criteria for the Dark Sky status should be in Scoping.

2 Any comments on overall methodology proposed to assess effects on landscape and visual receptors, including cumulative effects?

5.7.1 Best practice is to include windfarms within 60km radius for cumulative effects but the Applicant is only proposing to consider those within 20km at this stage. We strongly recommend the 60km radius be used.

3 Are the proposed viewpoints acceptable, including for night-time assessment?

Examining the selection of viewpoints it is clear further refinement is necessary. Many are in unrealistic or positions which do not give a proper impression of the wind farm in the experience of people passing through and living in the landscape.

For example (a sample to illustrate, all have issues):

- View point 1: this position has Black Hill occluding the view of the wind farm. A more realistic view would be found a short distance down the road at 24003 598241. Furthermore, producing an animation of passing between Viewpoint 1 and 3km down this route at 239804 597931 is well within the capabilities of wind farm planning software and would provide a better impression that a photomontage.
- Viewpoint 2: viewpoint is deep in an unrepresentative deep-sided valley which is a tiny portion of NCR7. Higher on the flat area around 233143 599703 to 233674 601106 would be more informative
- Viewpoint 6: the westerly point of Straiton Cemetery is unrepresentative of the residencies and school on the easterly section of this road, which have a greater exposure to the visual impacts of the proposed wind farm
- Viewpoint 9: Crosshill impacts are not well represented by a view from the Bowling Club car park. Viewpoints along Dalhowan Street or as you approach Crosshill from Maybole would be more informative

Additionally, viewpoints should be considered further afield. For example, due to its placement and scale the proposed wind farm can be seen from the junction between the A77 and the road into Alloway, as well as along the A713 from Ayr to Dumfries.

Suggestion: re-evaluate all the viewpoints and find more representative positions in conversation with the community. The scale of these turbines has much greater effect, at longer distances. At 2-3x the height of previous generations of turbines, they will be as visible 4-9x further away. Certain locations have been ruled out in the scoping document, but there is no supporting reasoning or information as to why. It is suggested depictions are created to illustrate why they are excluded.

Further viewpoints need to be included from e.g. venues for weddings. Viewpoints from Balbeg Country Holidays and Tairlaw should also be included. Balbeg Country Holidays is a major tourist accommodation business with over 1,000 guests each year. Tairlaw has a popular picnic area and 2 properties. The viewpoint from the summit of Kirriereoch should be included as it is popular with hill walkers. Turnberry Golf Course should be included as it is a world-class course and has hosted the British Open.

Night time assessments should also include the western end of the Carrick Forest Drive as this is used by star gazers.

4 Are there any other scoping or in planning windfarm sites, in addition to those illustrated, to consider as part of the cumulative assessment?

Work is on-going at Keirs Hill and the Scoping Report is now available for Craiginmoddie which adjoins this Proposal.

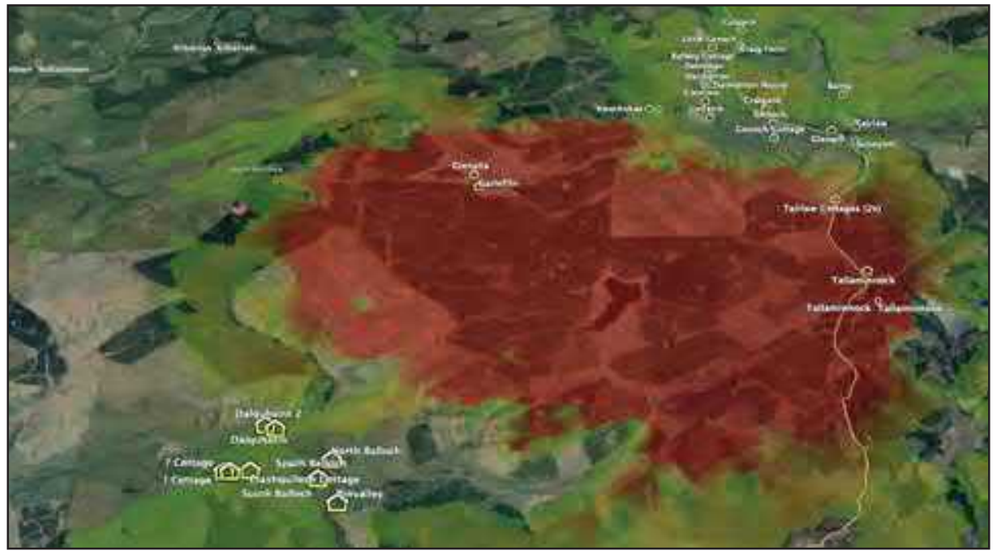
5 Has the consultee identified any further landscape or visual receptors to be considered within the assessment (eg. where potential significant effects may occur)?

The Applicant should consider Overbearing (a term used by Reporters when the impacts are unacceptable). Using the algorithm derived from 53 determinations from 14 Decision Notices involving 13 Reporters in Scotland between 2009 and 2017, it was possible to quantify which properties would suffer from the proposed wind farm being overbearing and result in unacceptable impacts to the quality of life at the property.

It was found that 5 residences (Tairlaw Toll (2 properties), Tallaminnoch, Glenalla and Garleffin) would all categorically fall within this unacceptable finding. Further afield there was a possibility that 13 properties in the

valley between Straiton and the proposed wind farm might be considered to have negative impacts due to the overbearing nature of the turbines, and south west of the site 8 properties between Balloch and Barr might also be similarly effected.

The following diagram illustrates this (red being categorically overbearing, green being found to be overbearing in some cases).



Additionally, it should be noted that the two roads which pass through the red overbearing zone include a National Cycle Route (7) which is effected for a distance of 3.5km and a tourist route through the Galloway Forest Park which is effected for 4.6km. Core paths and the Carrick Forest Drive also pass through the red zone.

There is a number of designated landscapes within the area as well as listed buildings of historical value and hotels and other businesses which depend on wedding parties. There are also camp sites, road and rail routes which have been omitted.

6 Do you agree with the landscape and visual receptors proposed to be scoped out?

We agree that Dumfries House can be scoped out. Culzean Castle Garden and Designated Landscape should not be scoped out if the layout of the turbines alter and views of the Proposal can be seen from any part of the grounds. It is one of the most visited sites in Scotland and although, at present, views might not be seen from the building or immediate surroundings visitors will see the Proposed Development coming to and from this receptor. The re-routing of the A77 around Maybole should be considered.

The Merrick Wild Land Area should not be scoped out. The Proposal is located very close to this designation – the only such one in the south west of Scotland.

7 Are there any other relevant consultees who should be consulted with respect to the LVIA?

We welcome the statement that *"SPR is committed to undertaking meaningful and wide-reaching consultation".* We believe the following organisations would be useful consultees and provide valuable local information.

The Galloway and Southern Ayrshire Biosphere. Staff at the Biosphere are familiar with the area and are therefore ideally placed to offer informed observations.

Save Straiton for Scotland. Board members have intimate knowledge of the area and can call on the services of key supporters (also local) to provide expert analysis. They have been invited by Reporters to co-ordinate local representation and played an equal role to that of the local council at Public Inquiry.

The Galloway National Park Association. Again this organisation has intimate knowledge of the area and their members are from a variety of local businesses and organisations.

John Muir Trust. They should be consulted regarding the impacts to the Merrick Area of Wild Land.

8 Do you have any comments on Wild Land Assessment, noting further consultation is require on its inclusion?

This is the only Wild Land Area in South West Scotland and consequently a precious resource. It should not be compromised by the industrialisation of the land in close proximity and, we believe, should definitely be included.

People travelling to and from this area should not have their experience of wilderness impaired by industrial features. When in the Wild Land Area looking outward, views of turbines in close proximity would diminish the quality of this precious landscape. A full assessment is therefore vital.

Chapter 6 Ecology

9 Do you agree with the Ecology proposed approach for baseline collection, prediction of effects and significance assessment?

6.3 We have concerns about the adverse effects on general wildlife and biodiversity interests of the Biosphere Reserve. We also have concerns about the possible impairment of quality of Linfern Loch, River Stinchar and Water of Girvan catchments and about the possible impairment of quality of the water going by aqueducts to Loch Bradan.
We believe strongly that terrestrial invertebrates should not be ignored/dismissed.

6.6 We feel it is not acceptable that degradation of Linfern Loch could be permanent.
The consultation with relevant bodies and field surveys need to be robust and not just walkovers. People who work in these forests know a lot about the life in them and should also be consulted.

Chapter 7 Ornithology

10 Do you agree with the Ornithology proposed approach for baseline collection, prediction of effects and significance assessment?

7.3 Noted that a peregrine eyrie was recorded but signs that breeding did not take place or was unsuccessful. This does not mean that breeding will not take place and be successful in the future. The same applies to merlin and goshawk.

7.6 We do not agree with scoping out species not listed in 7.3. There are at least two other species of goose, possibly resident, at Linfern Loch, as well as ducks. There are also summer migratory birds present on site.

Chapter 8 Cultural Heritage

11 Do you agree with the Cultural Heritage proposed approach for baseline collection, prediction of effects and significance assessment?

8.3 No. The Applicant states *"It is considered only those assets within a relatively close proximity to the Proposed Development have the potential to experience a significant effect on their Setting. As such, detailed assessments will be undertaken for designated sites within 5km of the Site, as well as for heritage assets up to 10km identified during consultation or with a larger presence in the landscape such as Garden and Designed Landscapes. In all cases, only assets shown to have potential visibility of the turbines within the ZTV will be assessed."*
The height of the proposed turbines to blade tip is 200m. This is considerably higher than other turbines in the area and therefore the effects are likely to be more significant both on assets within the vicinity and further afield. Assessments should be made on all assets up to 20km from the site boundary. This would ensure Turnberry Castle, Culzean Castle, Dunaskin and other important cultural assets are included in assessments.

8.6 From past experience with floodlighting of windfarms under construction the lighting impacts on a much wider area, especially where no other source of lighting exists.

Chapter 9 Hydrology, Hydrogeology, Geology and Peat

12 Do you agree with the Hydrology, Hydrogeology, Geology and Peat proposed approach for baseline collection, prediction of effects and significance assessment?

Basically there is nothing concrete in this section. All consultation has still to be done and therefore it is theory based.

Very concerned about the disturbance of land, building of roads etc. will lead to compromising the quality of water on the site. These include public water supplies (the aqueduct bringing water to Loch Bradan), private water supplies (only two properties are included), watercourses leading into Linfern Loch, River Stinchar and Girvan Water.

Chapter 10 Noise

13 Do you agree with the Noise proposed approach for baseline collection, measurement locations, prediction of effects and significance assessment?

10.2.1 Considering the proposed height of the turbines 5km would not be sufficient as a study area.

10.2.4. Additional to Dersalloch and Hadyard Hill wind farms there are 2 other proposed sites, one already in application, that are proposing turbines of a similar height within 5km of this site which should be included in the Study Area.

10.5.1 Do not agree with scoping out construction traffic noise. These are quiet, rural roads and any additional traffic is always significant. PAN 1/2011 insists noise from traffic sources should be assessed. Regarding 1km proximity to the proposal 2 homes (receptors) are within 1km of the proposal so noise and vibration issues should be revisited.

10.5.2 Energy Storage Facility – since this is an unknown in terms of potential noise generated it should not be scoped out.

Low frequency noise and infra-sound. The document referred to was published in 2014. More recent documents point out the effects on health, both physical and mental, of low frequency noise and infra-sound. Court judgements in other countries have recognised these as injurious to health.

10.7.1.1. Blasting – when ScottishPower Renewables built Dersalloch some blasting occurred outwith agreed blasting schedules so control was inadequate.

10.7.2.2 Knockskae has not been included, yet already is affected by noise from the Dersalloch wind farm, therefore cumulative effect very likely.

Chapter 11 Traffic and Transport

14 Do you agree with the Traffic and Transport proposed approach for baseline collection, prediction of effects and significance assessment?

11.2 Missing from the road network is the section from the B7045 at Straiton to the access road. This passes: residential properties, church, local amenities, local primary school, cemetery, stand-alone properties and farms. This is normally a quiet road with local, agricultural, forestry, visitor and tourist traffic. Any increase in traffic is noticeable and significant.

From the B7023 – B741 the route also passes a cemetery and the entrance to Blairquhan Castle.

If traffic is travelling to the site from Ayr, Prestwick and from the north the quickest route is southbound along the A77 to Minishant, turning into the B7045, through Kirkmichael and Straiton and along the Newton Stewart Hill Road (C46W) to the site entrance. If the Applicant anticipates vehicles using this route then it should also be assessed.

11.7 Assessment Methodology. The Applicant has listed a various categories of receptors. This list should also include wedding venues and cemeteries (in sensitive locations), people with disabilities and people with pets. The local roads are also used for cycle races.

12 Socio-Economics, Recreation and Tourism

15 Do you agree with the Socio-Economics, Recreation, Tourism proposed approach for baseline collection, prediction of effects and significance assessment?

No, for the following reasons:

12.2.1. The recreation and tourism assessment focus on a 5km and 15km Study Area respectively. Due to the height of the turbines this should be enlarged to 20km. Turnberry Golf Course and Glen App Castle are world-class assets and should be included in assessments along with others.

12.2.2. The list of small-scale settlements and communities is incomplete and random.

12.2.3. The list of recreation facilities is incomplete.

12.2.4. The list of tourist facilities and attractions is incomplete. The list of tourist accommodation is also incomplete.

12.4.1 Socio-Economics. Community benefit and/or shared ownership should not be included in the Scoping report. It is not a planning consideration and it is not guaranteed. As an example; SSE agreed to community ownership of a turbine when it developed Blackcraig wind farm near Balmaclellan, Dumfries-shire. After receiving

planning consent they promptly sold the site and community ownership was not honoured. Community benefit is not a legal requirement.

12.6 We welcome the statement made by the Applicant that no issues concerning Socio-Eonomics, Recreation and Tourism are to be scoped out of the EIAR.

12.7.3. Tourism. The Scoping report should include an independent tourism impact study. Only by doing this will the Applicant know what the local tourism business are, their turnover, the type and number of visitors they attract, and where they come from, the 'tourist spend' which the visitors bring to the area, and the likely effect of the wind farm proposals on their business.

12.7.4 Socio-Economics. Again community benefit and shared ownership should be scoped out for the reasons stated before.

12.7.6. Given the height of the proposed turbines the Study Area should be 20km. Not all tourism businesses are advertised on VisitScotland's website, particularly smaller businesses more common in this area.

With regard visitors' decisions to holiday in the area, the report by Mountaineering Scotland 2017 should also be referenced.

16 Are there any other receptors that should be included within the assessment?

Yes. The Study Area needs to be increased to 20km and these would then be covered. If Glen App Castle and Gardens are outwith this area but have views of the Proposal they should be included.

It is obvious that this has been a desktop exercise so far as recognised walks around various villages as well as other attractions have been omitted. One important omission is Stinchar Falls which lies within the site.

Loch Bradan is not only used for fishing but is popular for walking and there is also a cycle path. The area is also used for wild camping.

There are also several establishments which specialise as wedding venues.

The South West Coastal 300 route.

Chapter 13 Other Issues

17 Do you agree with the proposed approach for baseline collection, prediction of effects and significance assessment for the following topics:

Forestry and Land Use;
Aviation and Radar;
Telecommunications;
Air, Climate and Carbon;
Shadow Flicker;
Population and Human Health;
Major Accidents and Disasters;
Material Assets.

Shadow Flicker.

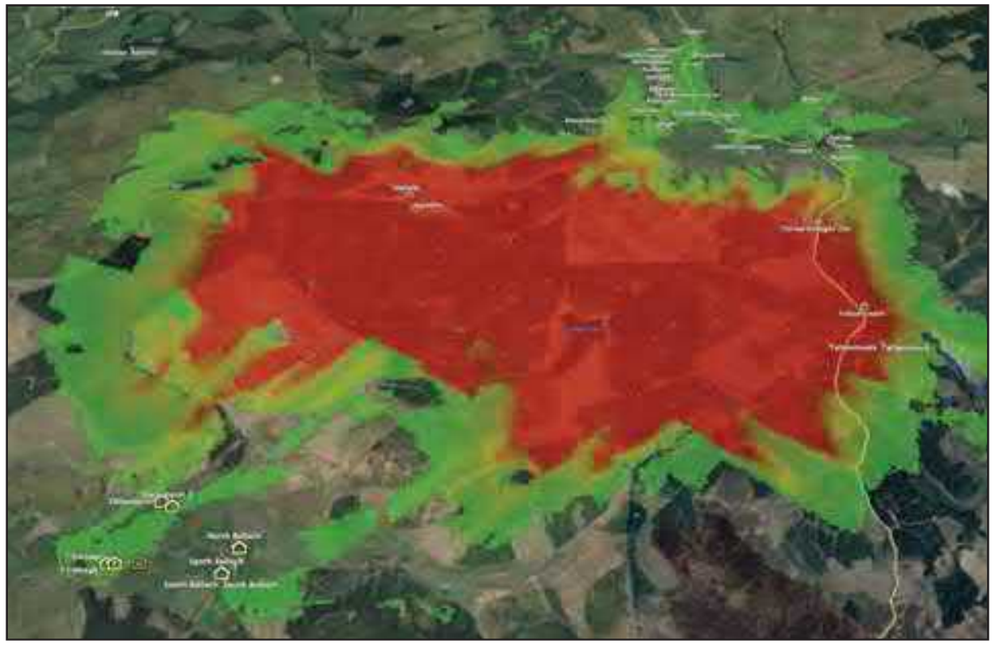
Calculating Shadow Flicker effects for the proposed wind farm illustrates that four properties would suffer

unacceptable flicker effects (Tairlaw Toll, Tallaminnoch, Glenalla and Garleffin). There is also quantifiable effects to the North East along the valley towards Straiton and the valley to the South West between Balloch and Barr.

Whilst the scoping document does recognise this needs to be properly investigated, it is noted that they do refer to vegetation as a possible means of mitigation which is not only explicitly ruled out in planning advice but has also been found to intensify the flicker effect. The overall supply capability of the proposed development should be questioned if the alternate mitigation of switching off turbines when they potentially produce flicker: the severity is high enough to require 10-15% reduction in output.

Suggestion: when calculating Shadow Flicker the calculations should be extended beyond the problematic "10x turbine blade diameter" limit. We note that the Applicant has suggested they will extend this to 2.5km. Due to the topography of the landscape this should be extended to at least 6km (most wind farm modelling software is capable of this and, if not, it is not an expensive investment)

The following diagram shows the Shadow Flicker impact from unacceptable in red to problematic in green



Chapter 14 Topics 'Scoped Out'

18 Do you agree with the list of issues to be scoped out and the rationale behind the decision?

Table 14.1 We do not agree with scoping out Culzean Castle Garden and Designated Landscape if the layout changes and the ZTV shows the Proposal would be seen.

We do not agree with scoping out terrestrial invertebrates. They are an important part of the ecosystem and as such should be included.

We do not agree with the decision to scope out noise caused by vehicular access to the site. Tallaminnoch is within 250m of the access road and will certainly be subjected to significant noise levels.

We do not agree with scoping out low frequency noise and infrasound. The document referred to is from 2014 and more recent publications are of the opinion that they are potentially harmful, both physically and mentally.

19 Are there any key issues or possible effects which have been omitted?

Any forest plan would be looking at enhancement of habitat/environment. For example Linfern Loch would be studied as an important habitat. Because of the time that loch has been in existence the habitat surrounding it is natural and supports a wealth of different forms which make up its ecosystem. There are many forms of invertebrates dependent on such a habitat and these invertebrates are the attraction for the bird life and bats which feed on them. Harming this habitat in any way or form will not only affect the ground and flora but will have a major knock on effect on a whole range of creatures. Therefore it is important to carry out a proper study of this area and also a proper study of terrestrial invertebrates.

We note that the Applicant will explore the potential for an energy storage facility and more details about the size, location, infrastructure and risk assessment would be helpful to determine whether or not it is a key issue or could have potential impacts.

20 Of those issues identified for assessment, which is the most important/material and which is the least?

Landscape and visual are the most important.

None is least important as all are important as they are inter-connected and therefore cannot and should not be ranked.

Dailly Community Council - Consultation Response

CARRICK WIND FARM SCOPING REPORT RESPONSE FROM DAILLY COMMUNITY COUNCIL

Question 1:
Do you agree with the Landscape and Visual proposed approach for baseline collection, prediction of effects and significance assessment?

Agree with SNH that Merrick Wild Land Area should **not** be scoped out.

Galloway Dark Sky Park and the UNESCO Southern Ayrshire & Galloway Biosphere should also both be **scoped-in** regarding night light – because of height of turbines and the rotation of the blades, they will be clearly visible from a very far distance, 10 times rotor blade is not sufficient for the height. The turbines will be considerably higher than those turbines already existing in the Hadyard Hill windfarm.

Transmission lines, their construction and direction should also be taken into consideration in this scoping. Where will the interconnector be and how much construction will have to be done for this and the transmission lines? Is there capacity in this area?

The destruction of roads and the creation of wider tracks should also form part of this scoping.

Should the developable area at the Pilot come into consideration, the whole parameter changes.

5.3. Agree - Landmark Hills should be scoped-in as there will be a cumulative effect from other potential windfarms, **namely Craiginmoddie,** and others either operational, under construction or in scoping.

UNESCO Biosphere should be scoped-in - Merrick WLA; Galloway Forest Dark Skies Park Core Area; Galloway Forest Park; and Galloway Hills - Dumfries and Galloway Regional Scenic Area – are all within the Biosphere.

Water of Girvan Valley; High Carrick Hills; and Stinchar Valley should be scoped-in.

Forestry should have no part in any assessment as forestry is constantly changing – felling, planting, fallow.

5.3.3 “A preliminary Study Area of 45km radius from the outermost turbines is proposed for the LVIA, as recommended in SNH guidance for turbines over 150m to blade tip” – having the blade tips at 200m is considerably more that over 150m. Thought should be given to any reduction in the radius – this is unchartered ground.

5.5.2 Landscape Designations - Culzean Castle and Country Park; Culzean Castle Garden and Designed Landscape; and Dumfries House Garden and Designed Landscape, as well as other more local ones Bargany, Kilkerran and Dalquharran – as the actual siting of turbines has not been decided, these should **not** be scoped-out.

5.5.3 Not entirely convinced that all those listed will have limited sight of the turbines. Is Barhill a typo – should read Barrhill? Due to the height have other settlements also been considered – Pinmore and Pinwherry, Bargrennan.

5.7 Forestry should have no part – viewpoints should be without forestry – should be bare land.

Question 2:
Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, including cumulative effects?

There are now a lot of windfarms in the area, cumulative information/data and noise generated by windfarms must be considered – Hadyard Hill, Craiginmoddie, Clauchrie, Dersalloch, Keirs Hill and others, even those further afield – for example Mark Hill, Killgallioch.

5.7.1 (84) 20km is **not** sufficient for cumulative effect analysis – 60km is best practice.

Question 3:
Are the proposed viewpoint locations acceptable, including for night-time assessment?

Wireline and photomontages are not easy to read and are very subjective. It would be far better to have a proper scale model which would show positions, heights and angles.

Increased size / height and elevation of turbines will result in their scale within the landscape being completely different.

More viewpoints should be considered, not just what has gone before. There are more turbines on the skyline. Viewpoints are not always in appropriate places – experience has shown this.

There does not appear to be any consideration to views from the Clyde and from the air.

There does not appear to be anything taken from U62 road from Dailly over the hills to Turnberry, or the Wallacetown to Maybole road.

Viewpoint 9 at Crosshill appears to be in the valley, not from the actual road coming over the hill from Maybole which would give a more accurate view of what travellers through the area would experience.

Viewpoint 4 depending on exactly where that is, it could be in the valley surrounded by forestry.

There does not appear to be anything from Barony Hill area, which is used by walkers, as well has having residents – for example Knockrochar, Dobbingstone.

Due to the height of these turbines, consideration should be given to views further away, for example the new bypass at Maybole on A77, all along the corridor towards Ayr. Further, consideration should also be given to other entrances to this area including on the North Eastern side along the A713 from Ayr to Dumfries.

Per SNH re question 1 re night light.

Question 4:
Are there any other scoping or in planning windfarm sites, in addition to those illustrated, to consider as part of the cumulative assessment?

Clauchrie is in Consultation.
Craiginmoddie is in Scoping.
Kirk Hill is under appeal which will affect the Girvan Valley.
A development in the Stinchar Valley at/near Knochodhar.

Question 5:
Has the consultee identified any further landscape or visual receptors to be considered within the assessment (e.g. where potential significant effects may occur)?

There are various individual residences in the area – Glenalla for one. They would find the massive nature of these new 200m turbines excessive. As will those in the Stinchar Valley for example Dalwyne, North and South Balloch.

Has enough consideration been given to Historic or Listed Buildings – Dalquharran Castle and any future development at Dalquharran, businesses that depend on venues for weddings and tourists – Turnberry, local craft shops, Brunston Holiday Chalets.

There is limited acknowledgement of the National Cycle route 7, the Core Path network or the actual roads that run through or close to the Site. Others further afield such as the Rail links or Core Paths on the Northern side of the Girvan Valley would also be visually impacted. People will always be aware of the massive industrial structures as they travel through the area.

Question 6:
Do you agree with the landscape and visual receptors proposed to be scoped-out?

Culzean Castle and Country Park, Culzean Castle Garden and Designed Landscape should be **scoped-in.**

Merrick WLA should be **scoped-in.**

Question 7:
Are there any other relevant consultees who should be consulted with respect to the LVIA?

All the ones listed in your Appendix C should be able to give useful information especially the Biosphere, and those organisations that work closely in the area. Galloway National Park Association does not appear to be on your list.

Question 8:
Do you have any comments on Wild Land Assessment, noting further consultation is required on its inclusion?

Full consultation required with appropriate bodies such as John Muir Trust, Merrick WLA is the only one in the area and needs a rigorous assessment.

Question 9:
Do you agree with the Ecology proposed approach for baseline collection, prediction of effects and significance assessment?

There has to be rigorous field surveys as well as desk study. There are obvious concerns regarding all forms of wildlife. Water contamination and diversion can have devastating effects on the biodiversity and wildlife of the Site and beyond.

Question 10:
Do you agree with the Ornithology proposed approach for baseline collection, prediction of effects and significance assessment?

SNH and RSPB as consultees. Agree there should be robust field surveying as well as desk study - should **not** be scoped-out.

Question 11:
Do you agree with the Cultural Heritage proposed approach for baseline collection, prediction of effects and significance assessment?

8.5 (150) No. As already mentioned, as the height (200m) is so much greater than what is already in place in the area, consideration must be given to Cultural Heritage further afield – Culzean and Turnberry should be included in this zone, therefore at least 20km from site boundary.

Question 12:
Do you agree with the Hydrology, Hydrogeology, Geology and Peat proposed approach for baseline collection, prediction of effects and significance assessment?

There is concern about the private water supplies off the Water of Girvan and Stinchar Valley catchment areas, and other catchments related to the Site – for example Dobbingstone, and Glenalla. From past experience not enough consideration has been given to those on private supply relating to contamination and maintenance of supply. Public water is also of concern at Loch Bradon.

Full hydrogeological assessments should be conducted for all water supplies whether private or public.

Anything relating to Peat and disturbance or removal should remain scoped-in.

As with all construction of this magnitude, there is disturbance of land and water. Considering the height of the turbines and the base to anchor such a turbine, there must be very robust consultation, not just desk study. There will be considerable disturbance.

Question 13
Do you agree with the Noise proposed approach for baseline collection, measurement locations, prediction of effects and significance assessment?

10.2.1 No. Considering the height of the turbines 5km is not enough. Through experience, noise travels, and depending on the wind direction the noise is substantial. *'This is considered sufficient to ensure that all potentially significant cumulative noise effects will be addressed – i.e. the combined effect of noise from the Proposed Development when operated simultaneously with any other identified windfarm developments.'* How would this be addressed?

Noise experienced from windfarms is not only dependent on wind direction. Local experience shows that it can be heavily influenced by topography. Mitigation is already in place for one property due to noise levels generated by the operational Hadyard Hill windfarm. This surely suggests that further mitigation would be required for this development. What impact would this have on overall output and how will cumulative impact be assessed?

10.2.4 Besides Dersalloch and Hadyard Hill windfarms, there is the Consulting Clauchrie, and the Scoping Craiginmoddie, both have been mentioned before. There is also the possibility of another in the Stinchar Valley area at Knockodhar.

10.5.1 Construction traffic noise – this should **not** be scoped-out. Noise travels, and this is a rural quiet area. Additional traffic will make a significant difference.

From experience, 'Such works would be small scale, local, temporary and short-term only, and would be akin to temporary work associated with utilities servicing etc. An assessment of construction noise and vibration from off-site road and junction improvement works is therefore scoped-out of the assessment.' – is not necessarily the case and should **not** be scoped-out.

The villages in the area, Dailly for example, have narrow roads that are not designed for large volumes of heavy traffic.

10.5.2 Operational Phase – Energy Storage Facility – this is an unknown noise feature – this should **not** be scoped-out.

10.5.2. (218) Low frequency and infra-sound – there is new international evidence relating to the effects on health – physical and mental. This should **not** be scoped-out – this must be thoroughly assessed based on up-to-date information.

10.7.2 Cumulative affect from all those windfarms in the potential area should be included, as indicated previously.

(228) Baseline noise survey – is 3 weeks long enough to take into account differing weather conditions during different seasons?

Question 14:
Do you agree with the Traffic and Transport proposed approach for baseline collection, prediction of effects and significance assessment?

There is lack of clarity regarding proposed routes. Many locals are inconvenienced, having to reverse significant distances on narrow country roads. There is more traffic and travelling at much greater speeds. The increase in litter due to windfarm traffic is significant.

No real comment as it is not clear whether Dailly will be part of the route or not. If it is, then more assessment will have to take place.

11.5 (250) Do not agree that operational traffic flow should be scoped-out. We have had experience of increased traffic flow as a result of operational issues.

As stated the assessment has only been desk-study. More information has to be made available to consultees on the actual route. Depending on the amount of material/assets that must be moved, any assessment will be flawed.

Question 15:
Do you agree with the Socio-Economics, Recreation, Tourism proposed approach for baseline collection, prediction of effects and significance assessment?

No. As previously stated due to the height of the turbines the assessment area should be larger – 20 km, to include such tourist attractions as Turnberry Golf Course and the walks around Maybole, as well as further to the West in the wilder moorland areas of Carrick Forest and beyond. To include traffic coming from Cairnryan up the coastal A77 through Ballantrae and tourist attraction/hotel Glen App. The view also from the Firth of Clyde by boat for tourists as well as locals. Travel by air should also be considered.

12.2.2 Small scale settlements – there are others.

12.2.3 Recreation – there are more facilities and activities.

12.2.4 Tourism – again, the list is incomplete. There are local activities and accommodation facilities that are not necessarily on Visit Scotland or similar database.

12.3 Sensitive receptors – there are other Trails / Paths that should be included – Dailly Trails, Carrick Way, Girvan Paths, Straiton Paths, Maybole Paths for example.

12.4.1 Mitigation – Socio-economics – local employment during construction – this has to be properly monitored. We have experienced very limited fulfilment of this mitigation in the past.

12.4.1 (284) This should not be part of the mitigation and should not be included in the Scoping Report at all.

12.7 (287) Agree with the statement. Who will be providing the independent assessment, especially for Recreation/Tourism Impact?

As previously mentioned the Study Area should be widened to 20 km due to the height of the turbines, which are considerably taller than those already existing in the area.

Question 16:
Are there any other receptors that should be included within the assessment?

Yes, more effort should be made to identify small businesses, attractions (eg smaller wedding venues), activities (eg wild camping, fishing, horse riding, off-road biking), recreational areas (fishing lochs such as Loch Bradon/Linfern Loch, walks/trails around Lochs and villages, etc) which are not necessarily on a Visit Scotland website or database. Too much emphasis has been made of desk-top information.

To include Glen App Castle, Turnberry, SW Coast 300 (has been on TV and is growing in popularity as the WC500), perhaps even Girvan and Maybole Golf Courses.

Question 17:
Do you agree with the proposed approach for baseline collection, prediction and significance assessment for the following topics:
- *Forestry and Land Use*
- *Aviation and Radar*
- *Telecommunications*
- *Air, Climate and Carbon Balance*
- *Shadow Flicker*
- *Population and Human Health*
- *Major Accidents and Disasters*
- *Material Assets*

13.6 Shadow Flicker – due to the height of the turbines is 10 x rotor diameter sufficient, the stated reports are from 2014 and 2010 before 200m turbines were considered. Even South Ayrshire's report is from 2015 – this has to be revisited, a proposal would be a distance greater than 3 km.

We have had experience of properties having intolerable shadow flicker issues, which in turn have created health issues. Mitigation by hedge creation is simplifying the problem.

13.7 Population and Human Health – this should **not** be scoped-out. The effects on health relating to shadow flicker, noise and ultra-sound frequencies is well documented. The Proposed Development may be 'non-emitting' in the sense of air pollution, these are other health issues.

13.9 Material Assets – there are concerns about borrow pits and the amount of material that will be required for building the Proposed Development. This aspect should be **scoped-in.**

Question 18:
Do you agree with the list of issues to be scoped-out, and the rationale behind the decision?

See notes under previous questions, but definitely do **not** agree to scoping out Culzean Castle Garden and Designated Landscape.

Low frequency noise and Infrasound should **not** be scoped-out – as previously mentioned, opinion on this subject has changed dramatically.

Question 19:
Are there any key issues or possible effects which have been omitted?

Do not know enough about the Energy Storage Facility – therefore cannot comment on this aspect.

The reduction in property value has not been addressed at all.
A number of local properties have been made uninhabitable and are now derelict due to windfarm noise and shadow flicker.

Question 20:
Of those issues identified for assessment, which do you consider the most important/material and which the least?

All important – visual/landscape, human and social economic, tourism, infrasound and low frequency, destruction of private water supplies.

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