



Sheirdrim Renewable Energy Development

Additional Information

November 2020

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1 Introduction

1. ScottishPower Renewables (UK) Ltd has applied to the Scottish Ministers for consent under Section 36 of the Electricity Act 1989 to construct and operate Sheirdrim Renewable Energy Development on land approximately 11 km south of Tarbert on the Kintyre Peninsula in Argyll and Bute (Central Grid Reference 181302, 657098). The proposed Development would have an installed capacity in excess of 100 MW comprising up to 19 turbines with a ground to blade tip height of up to 149.9 metres, with an installed capacity of around 114 MW and two ground mounted solar arrays with an installed capacity of around 20 MW, producing a combined output of around 134 MW. A battery storage facility would also be installed with storage capacity of around 38 MW of energy.
2. The proposed Development is subject to Environmental Impact Assessment (EIA) and an EIA Report was produced and submitted to Scottish Ministers on 31 October 2019 with the application (Reference: ECU00001957).
3. Additional environmental information was submitted to Historic Environment Scotland (HES) in early 2020. The additional information relates to queries received from HES regarding potential significant impacts on the Dun Skeig, duns and fort, Scheduled Monument and comprises:
 - A Letter dated 23 April 2020 accompanied by two larger formats of the wirelines and panoramic photographs originally provided in the EIA Report Technical Appendix 7.6, from Points B and C, as representative locations of views of the monument from the sea; and
 - A Letter dated 24 July 2020 accompanied by Figures 1 to 7 comprising a ZTV, photomontages and further wireline drawings from four locations (B1, B, B2, C) to illustrate the level of impact of the proposed Development upon the integrity of the setting of Dun Skeig.
4. This document has been produced to present this additional environmental information.
5. During the course of post-submission evaluation of the application, there has been other correspondence with various key stakeholders for the purposes of clarifying matters within the EIA Report. This correspondence is included as an appendix (separate document) for completeness but does not constitute additional information.

2 Additional Information for consultation

2.1 Correspondence with HES – 23 April 2020

23rd April 2020

Energy Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Our Ref: 405.00481.00051
Historic Environment Scotland Ref: 300036771
Your Ref: ECU00001957

To Whom it May Concern,

**RE: SHEIRDRIM RENEWABLE ENERGY DEVELOPMENT, ARCHAEOLOGY AND CULTURAL HERITAGE
RESPONSE TO HISTORIC ENVIRONMENT SCOTLAND LETTER OF THE 30TH OF MARCH 2020**

This response has been prepared to address the objection made by Historic Environment Scotland (HES) in their letter dated the 30th of March 2020. In preparing this response SLR are addressing HES's statement that the proposed development has the potential for significant adverse impacts on the setting of Duns Skeig duns and fort (Scheduled Monument Index No 2491) outlined in pages six to eight of their letter.

HES's Position

In their letter HES detail three elements of the monument's setting, including:

- Outward views from the monument;
- Reciprocal views with West Loch Tarbert (and passage along it); and
- Inward views towards the monument from the sea.

Regarding the first two aspects of the monument's setting, HES agree with the EIA Report that there would be no impacts that would be so adverse as to affect the integrity of the monument's setting and raise issues of a national interest.

With regard to the third aspect of the monument's setting HES state that:

'Dun Skeig is highly prominent above the Kintyre coastline. Its height and distinctive shape render it highly visible from across most of the Sound of Jura, closer to shore in the Sound of Gigha and from the mouth of West Loch Tarbert itself. Dun Skeig dominates the coastline and is even today often used as a reference point when navigating at sea. The setting of the monument therefore includes inward views towards it from the sea where it appears as the dominant coastal feature.'

'As demonstrated in the supplied visualisations (ferry route wireframes Point B and Point C), the proposed turbines would be clearly visible on the skyline directly behind Dun Skeig in most inward views

from the sea. The turbines would surround and appear above the Dun in these views, thereby competing for dominance with and diminishing the visual prominence of Dun Skeig.

The Freasdail turbines already appear in many of these views. However, these newly proposed turbines would be taller and located further west than Freasdail. The resulting impact would be significantly greater, being more prominent, more concentrated directly above and behind the Dun, and across a wider area of the surrounding skyline. When closer in to the coast (for instance to the east of the northern tip of Gigha), these turbines would also remain visible whereas the Freasdail turbines currently drop out of view.

This proposed development would therefore significantly diminish Dun Skeig's prominence in those views from out at sea which make such an important contribution to our ability to understand, appreciate and experience the monument. In turn this would significantly undermine the ability to understand and appreciate its relationship with the sea. This development would therefore threaten the integrity of the monument's setting and, consequently, would give rise to adverse impacts of a level that would raise issues of national interest.'

SLR Response

Post-submission of the EIA, HES requested larger formats of the wirelines and panoramic photographs from Points B and C as representative locations of views of the monument from the sea. These larger format visualisations are included with this letter.

The location of Points B and C are presented in Appendix 7.6 Ferry Route Wirelines: Ferry route between Kennacraig, Kintyre to Port Askaig, Islay, of the EIA. It was not possible to produce a photomontage from Points B and C, due to it being assessed from a moving ferry and sea. The visualisation provided included a wireline drawing and accompanying panoramic photograph. One of the disadvantages of wireline drawing compared to that of a photomontage is that wind turbines can appear more prominent than they might appear in a photomontage or as when built. In changing light conditions and changing weather conditions the turbines would in reality blend into the skyline more recessively than suggested by the wireline models, and when viewed in combination with the varied colours of the landform, the degree to which they would detract from experiencing and appreciating Dun Skeig would be far less prominent than suggested by HES based on the worst case scenario model provided by the wirelines.

Point B is located 6.4km, and Point C 12km, from the nearest proposed turbine (Turbine 4). In the view from Point C, proposed turbines 3, 6 and 8 are closest to the monument being visible as turning blades only with the remaining 12 visible turbines positioned to the right of the view. The aspect of the monument's setting that is important to the understanding and appreciation of the monument is that of its relationship with the sea and West Loch Tarbert from its prominent location upon the hilltop, as detailed in the EIA Report and by HES. The suggestion made by HES that the turbines would compete for dominance with Dun Skeig fails to address the key issue of the heritage significance of the fort, located on a prominent coastal hill, which is to oversee the maritime access to and from Loch Tarbert.

The turbines do not intervene in this intrinsic relationship, and therefore would not harm the integrity of Dun Skeig's setting.

As viewed from Point B there is a clear separation of the turbines from the fort by the intervening higher ground, which largely screens Turbines 3, 6, and 8. Although the proposed turbines would appear in the backdrop and to the right of the view of the fort, they would not significantly detract from an appreciation of the fort's relationship with the sea or its location upon a prominent coastal hill. Closer to the monument the proposed turbines become less visible before being screened from view entirely (see Figure 11.1 of the EIA Report).

In the wireline drawing from Point C the proposed turbines appear above the skyline and behind the monument, particularly turbines 4, 5, 9 to 12, 14, 16 and 17, and in closer proximity than to those of Freasdale Wind Farm which are not discernible in the photograph. At 8km from Dun Skeig, the hill itself is not as prominent in comparison to closer locations as represented by Point B, being one part of a wider view with landforms behind the hill forming the skyline. The relationship between the monument and the sea at this distance are also less easily appreciated. At 12km from the nearest proposed turbines, the turbines themselves are unlikely to be as visible against the skyline as suggested in the wireline drawings. They would form a minor component of the landscape where visible, and not overly detract from the potential appreciation of the monument at this distance.

Although Points B and C were chosen to be representative of inland views from the sea of the monument, it is in reality at locations that are in closer proximity to the monument than Point C, that the turbines have the potential to make the greatest impact upon the integrity of the monument's setting.

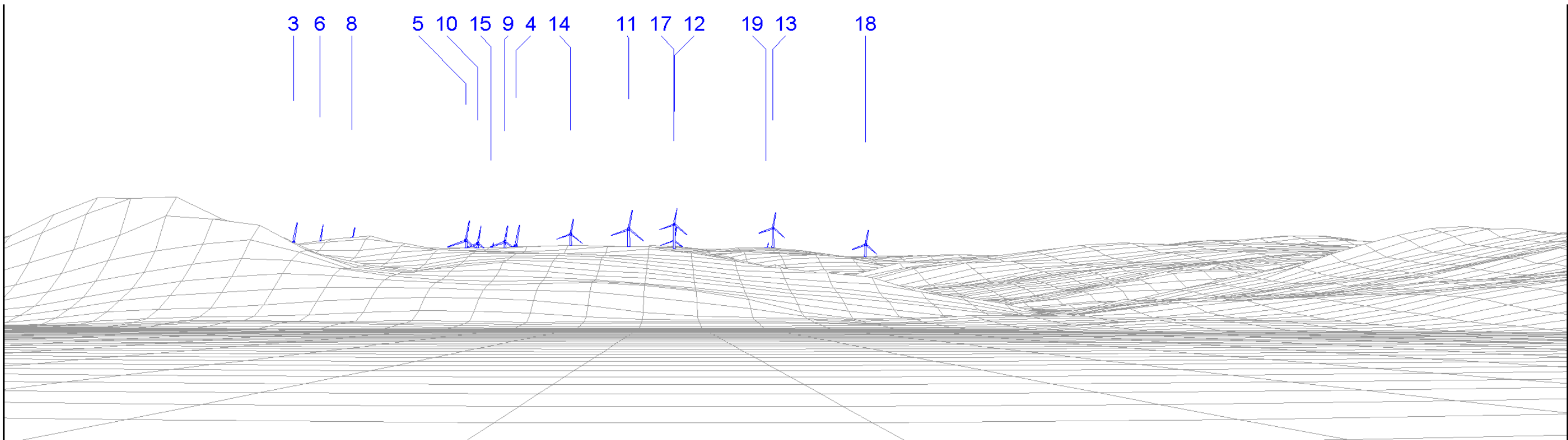
We conclude that, although both turbines and the monument will be visible in inland views from upon the sea outwith West Loch Tarbert, the magnitude of impact upon Duns Skeig duns and fort remains very low adverse and the significance of effect slight. There would be no adverse impacts from the proposed turbines that would affect the integrity of the monument's setting to the degree that they would have a significant effect.

Yours sincerely
SLR Consulting Limited

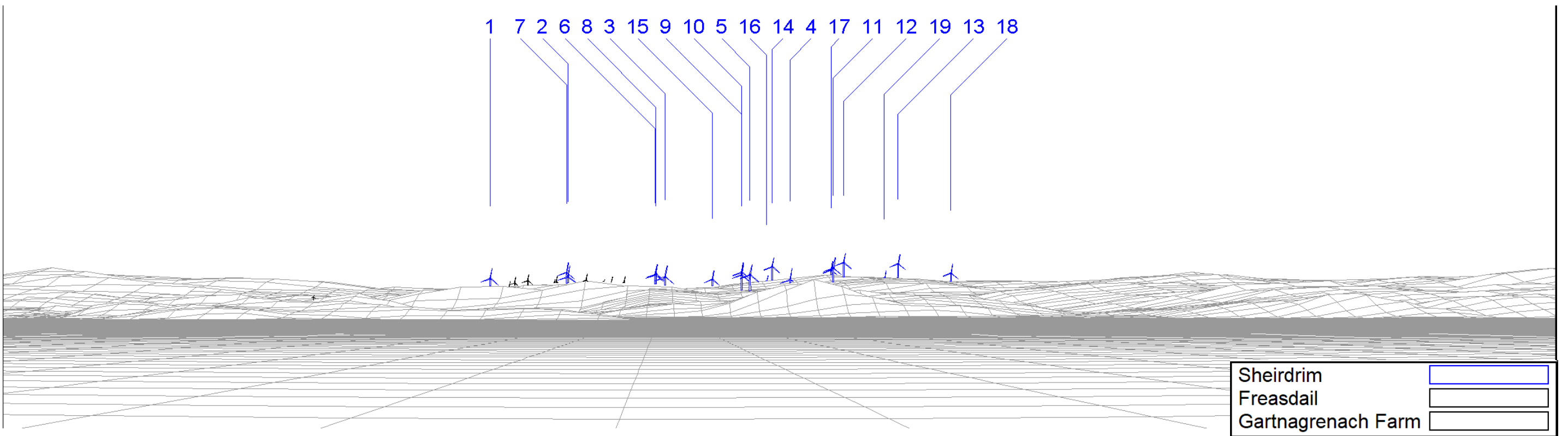
Redacted

Andrew Bates
Senior Archaeologist

Cc add names if necessary
Enc delete if no enclosures



Ferry route between Kennacraig, Kintrye to Port Askaig, Islay, Point B



Ferry route between Kennacraig, Kintrye to Port Askaig, Islay, Point C

2.2 Correspondence with HES – 24 July 2020

24th July 2020

Energy Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Our Ref: 405.00481.00051
Historic Environment Scotland Ref: 300036771
Your Ref: ECU00001957

To Whom it May Concern,

**RE: SHEIRDRIM RENEWABLE ENERGY DEVELOPMENT, ARCHAEOLOGY AND CULTURAL HERITAGE
FURTHER CLARIFICATION TO HISTORIC ENVIRONMENT SCOTLAND**

This letter is addressing HES's statement that the proposed development has the potential for significant adverse impacts upon the integrity of the setting of Dun Skeig duns and fort (Scheduled Monument Index No 2491). It has been prepared to clarify the issues raised by Historic Environment Scotland (HES) in their letters dated the 30th of March and the 21st of May 2020, the latter responding to SLR's letter of the 23rd of April 2020, to the proposed Sheirdrim Renewable Energy Development. A telephone consultation also took place between SLR and HES on the 1st of June 2020, where HES stated they would consider any further visualisations that SLR could prepare to support their case.

HES's Position as of the 21st of May 2020

In their letter HES state that:

'As noted in our letter of 30 March 2020, the existing Freasdail turbines are already visible in many of these views, including those from the Kennacraig ferry. We therefore do not agree that the proposed Sheirdrim turbines would appear as recessive features.'

Further to this, we consider that inward views of Dun Skeig from the waterways around West Loch Tarbert make an important contribution to the setting of the monument. Dun Skeig dominates the coastline and its prominent position demonstrates the control held by the monument over the wider waterways. Even today, Dun Skeig is used as a reference point when navigating at sea. It should be noted that Dun Skeig is a distinctive coastal feature in the panoramic photographs and wireframe views provided. These include the photographs taken at Point B and Point C on the ferry route between Kennacraig and Port Askaig. These inward views contribute to our understanding, appreciation and experience of the monument.'

We therefore disagree with the conclusion presented in the applicant's letter of 23 April 2020 that the magnitude of impact would be very low adverse. We remain of the view that this impact will

have an adverse effect on the integrity of the setting of this scheduled monument to the extent that it would affect our ability to understand, appreciate and experience this monument. The proposals are therefore not in line with paragraph 145 of Scottish Planning Policy (SPP, 2014) and raise issues of national interest such that warrant our objection.'

SLR Response

Attached to this letter are photomontages and further wireline drawings from four locations to illustrate the level of impact of the proposed development upon the integrity of the setting of Dun Skeig (SM2491). Wireline drawing from Point B and C were provided by SLR in their letter of the 23rd of April 2020. In addition to these original locations, visualisations are also included from two further locations referred to as Points B1 and B2 (see attached Figure 1).

Table 1: Summary of visualisations in Figures 2 to 6 attached to this letter

Location	Visualisation(s)	NGR	Distance to SM2491 (km)	Distance to Nearest Turbine (km)	Figure Nos
Point B1	Wireline	174300, 656820	1.5	5.4	2
Point B	Photomontage & Wireline	173404, 656627	2.4	6.4	3 & 4
Point B2	Photomontage	172033, 656981	3.7	7.4	5
Point C	Photomontage & Wireline	167788, 657742	8	12	6 & 7

Photomontages and wirelines provided here have been produced as 50mm single frame images to allow for the turbines and Dun Skeig to be viewed within the context of the surrounding landscape. Some comments are provided below regarding the production of the photomontages.

The alignment of the turbines in the photomontages are of a best fit. This is due to the photography having been taken on a moving ferry and not from a camera mounted on a static levelled tripod. Also, the grid references were acquired using a separate device and captured slightly after the photograph was taken.

Two of the photomontages (Points B2 and C) have been rotated. This is due to the camera not being level. We have rotated the photograph to align with the wireline as it is considered that the wireline is the more accurate source of information. Were the wireline rotated to match the photograph the turbines would not be vertical.

A wireline has also been presented for the view from Point C. This is because of the extremely poor visibility of the existing turbines of Freasdail Wind Farm in the photograph. The proposed wind turbines have not been rendered to match the existing Feasdail, to avoid minimising the potential impact of the proposed Development.

The basis of HES's objection to the scheme is that of the impacts upon the integrity of the monument's setting as the monument and proposed development are viewed from the sea outwith West Loch Tarbert. The dun and fort are located upon a prominent coastal hill which oversee the maritime access to and from the loch. The degree to which the proposed Development would intervene or detract from

the understanding and appreciation of the monument's maritime relationship, and there by the significance of the monument, is the basis of this assessment.

The proposed turbines do not intervene between the monument and its maritime setting, in that they are within the central upland part of Kintyre behind the monument as viewed from the sea outwith West Loch Tarbert. The photomontages from Points B and B2 (Figures 3 & 5) provide a better indication of the scale of the proposed turbines, as viewed from near the entrance to West Loch Tarbert, than previously supplied wireline drawings.

At positions closer to the monument, B1, B and B2, there is a perceived separation between the proposed turbines in the background and Dun Skeig in the middle ground. The scale of the turbines, in comparison to that of Dun Skeig, means when viewing the position of the dun and fort from these locations it is the hill and the monument's position upon it that form the dominant landscape feature. Although visible within the central upland part Kintyre, the turbines do not significantly detract from the appreciation of the monument's maritime setting or its position in relation to the entrance to West Loch Tarbert. The wireline in Figure 4 (Point B) and photomontage of Figure 5 (Point B2) allow the landscape to the north east, and left of the monument in the view, to be presented with the visualisations centred on the hill. In Figure 4 any proposed turbines to the left of the Dun Skeig are screened from view by the topography. In Figure 5, six turbines of the proposed Development to the left of the monument appear as turning blades only. The wireline drawing provided in Figure 2 from Point B1 demonstrates how quickly the turbines go out of view as you get closer to the monument, with just two blade tips visible. As viewed from these locations the proposed turbines would erode to a minor degree the heritage significance of the Dun Skeig scheduled monument and the ability to experience it, although a full appreciation and understanding of its strategic role and heritage significance would be unaltered.

Point C is located 8km from the monument and 12km from the nearest turbine (Figures 6 & 7). The hill of Dun Skeig is not as prominent a landscape feature as it is at closer positions, being just one element of a wider view with landforms behind the Dun Skeig forming the skyline. In this view, the hill does not dominate as a landscape feature. In addition, it is not visual impacts upon the hill that are being assessed, but instead the assessment is to determine whether there is significant change to the existing baseline which would adversely affect a viewer's ability to appreciate the relationship between the monument and its maritime setting. Due to the distance between the viewer and the monument and the view presented, this relationship is far less easily appreciated than at closer positions where both the hill and the monument are far more easily discernible. The turbines, although visible, do not erode the heritage significance of the monument or the ability to understand, appreciate and experience it from this location.

We hope these additional visualisations and text help further expand and clarify on our reasoning. That, although the proposed turbines would be visible from maritime positions, they would only erode to a minor extent the heritage significance of the Dun Skeig scheduled monument. Following the agreed methodology of the EIA Report, the significance of the effect would be very slight. There would be no adverse impacts from the proposed turbines that would affect the integrity of the monument's setting to the degree that they would have a significant effect in EIA terms.

Yours sincerely

SLR Consulting Limited

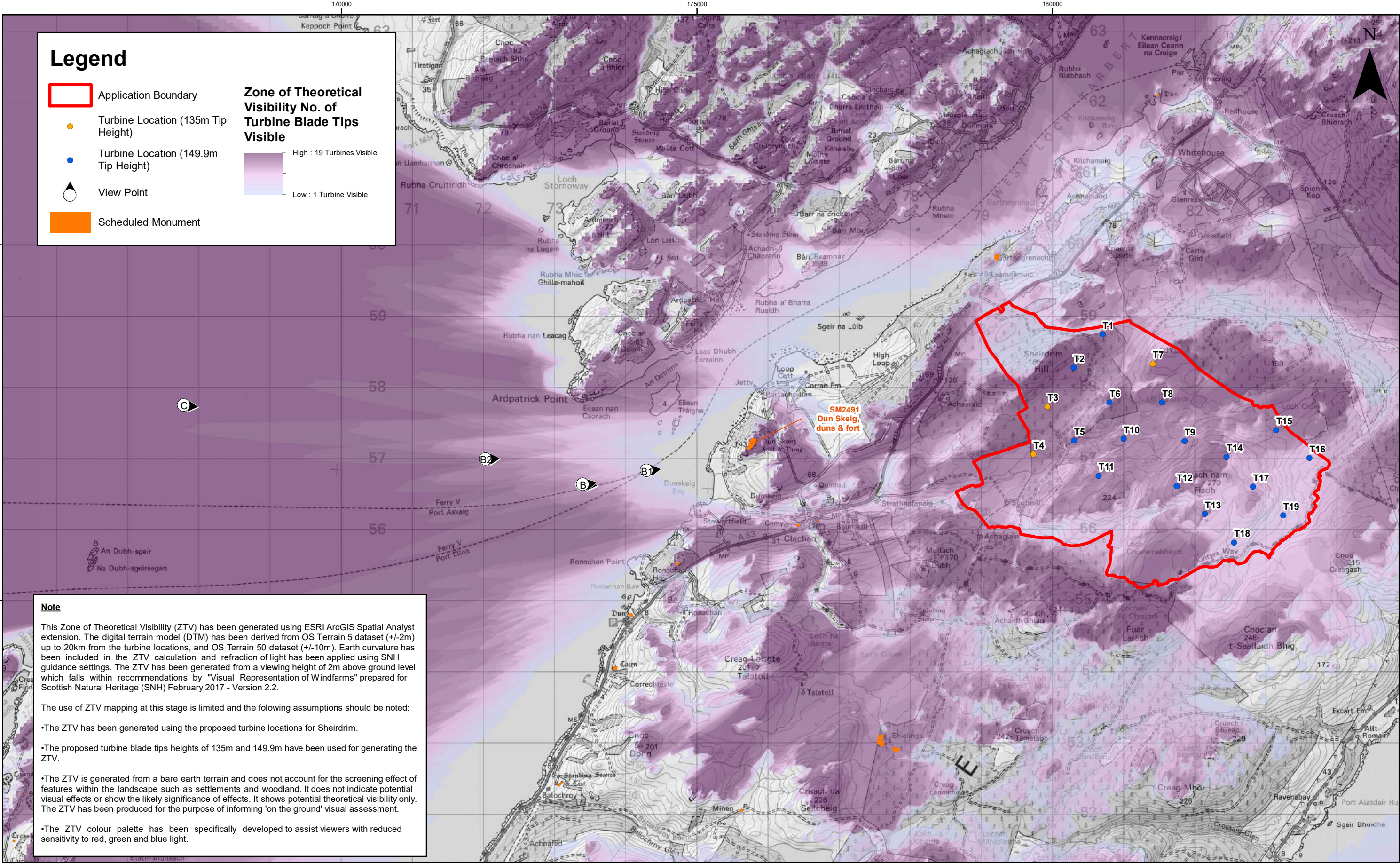
Redacted

Andrew Bates

Senior Archaeologist

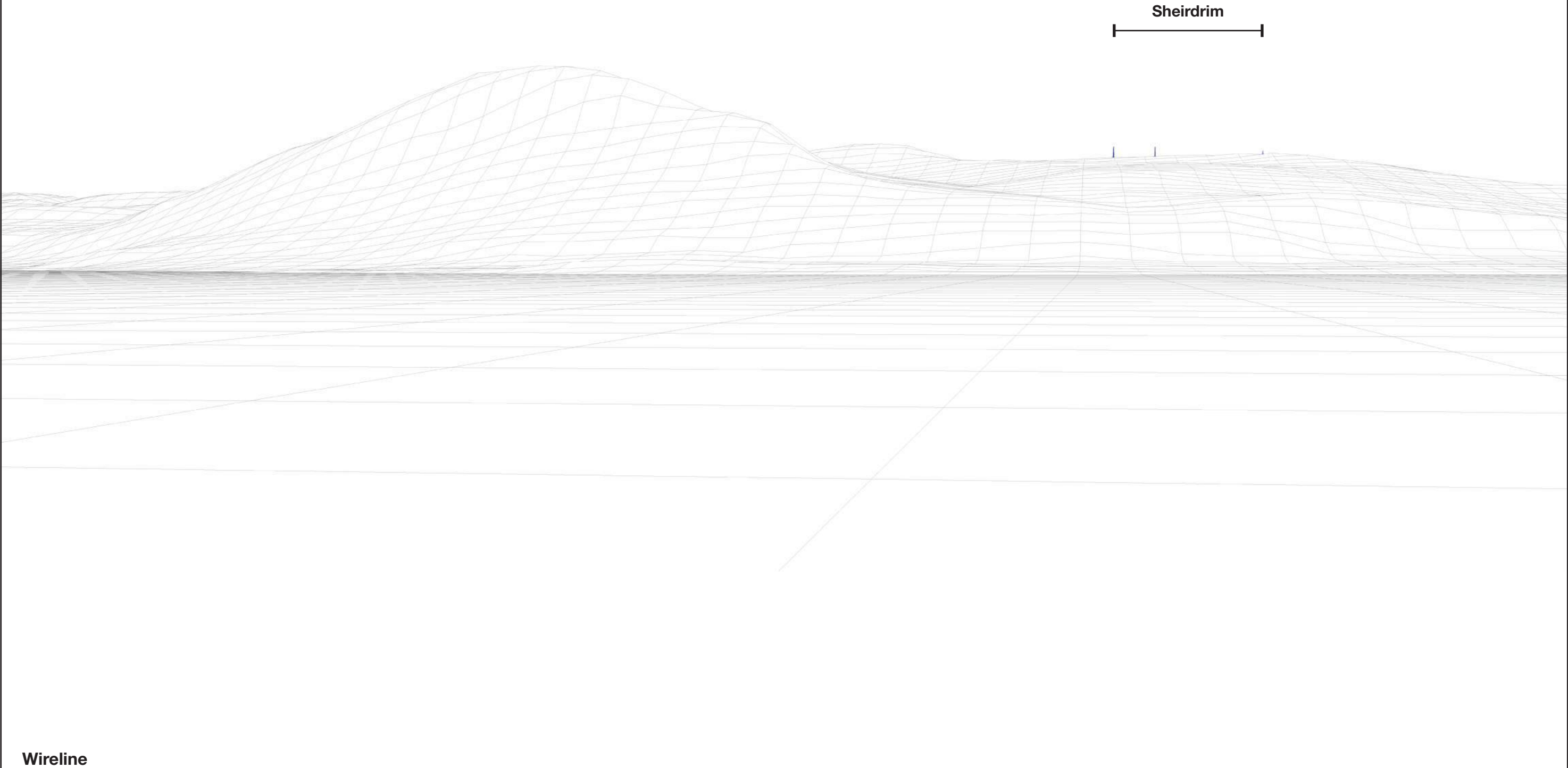
Cc add names if necessary

Enc delete if no enclosures



					1:50,000 Scale @ A3		© Crown Copyright 2019. All rights reserved. Ordnance Survey Licence 0100031673.	Sheirdrim Renewable Energy Development Archaeology and Cultural Heritage Dun Skeig (SM2491) View Points	Drg No 00481.00051.24.1.0		
	A	23/07/20	AB	First Issue.					Rev	A	Datum: OSGB36
	Rev	Date	By	Comment					Date	23/07/20	Projection: TM
									Figure	1	

View flat at a comfortable arm's length



Wireline

View flat at a comfortable arm's length

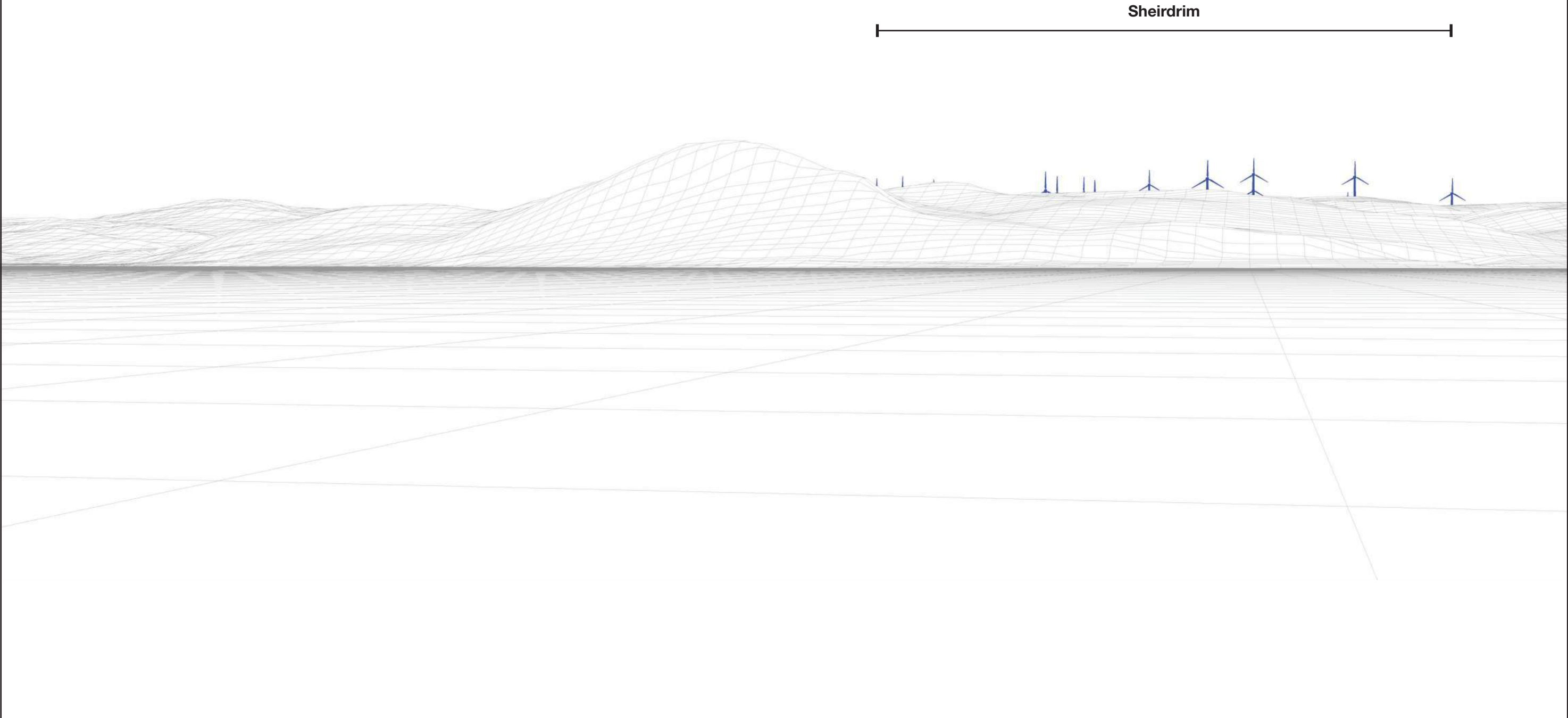


Photomontage

OS reference:	173404 E 656627 N	Horizontal field of view:	39.6° (planar projection)	Camera:	Canon EOS 5D
Eye level:	5.0 m AOD	Principal distance:	500 mm	Lens:	50mm f/0
Direction of view:	92.8°	Paper size:	420 x 297 mm (A3)	Camera height:	1.5m Above deck approx.
Nearest turbine:	6.4 km	Correct printed image size:	390 x 260 mm	Date and time:	20/09/2019 13:28

Figure 3
View from Ferry at Point B
Photomontage

View flat at a comfortable arm's length



Wireline



View flat at a comfortable arm's length

Photomontage

OS reference:	172033 E 656981 N	Horizontal field of view:	39.6° (planar projection)	Camera:	Canon EOS 5D
Eye level:	5.0 m AOD	Principal distance:	500 mm	Lens:	50mm f/0
Direction of view:	86.1°	Paper size:	420 x 297 mm (A3)	Camera height:	1.5m Above deck approx.
Nearest turbine:	7.4 km	Correct printed image size:	390 x 260 mm	Date and time:	20/09/2019 13:31

Figure 5
View from Ferry at Point B2
Photomontage



View flat at a comfortable arm's length

Photomontage

OS reference:	167788 E 657742 N	Horizontal field of view:	39.6° (planar projection)	Camera:	Canon EOS 5D
Eye level:	5.0 m AOD	Principal distance:	500 mm	Lens:	50mm f/0
Direction of view:	93.5°	Paper size:	420 x 297 mm (A3)	Camera height:	1.5m Above deck approx.
Nearest turbine:	12 km	Correct printed image size:	390 x 260 mm	Date and time:	20/09/2019 13:42

Figure 6
View from Ferry at Point C
Photomontage

View flat at a comfortable arm's length



Wireline

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RENEWABLES

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