

TECHNICAL APPENDIX 6.1: SCOPING RESPONSE TABLE

Sheirdrim Renewable Energy Development
Prepared for: ScottishPower Renewables



BASIS OF REPORT

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Table 1: Scoping Responses

Consultee	Summary of Key Issues	Where Addressed in EIA Report
<p>Argyll and Bute Council</p>	<p><u>The Application</u> - General - In terms of the Council's 'Argyll and Bute Local Development Plan' (adopted 2015) the Council will support renewable energy developments where these are consistent with the principles of sustainable development and it can be adequately demonstrated that there would be no unacceptable significant adverse effects, whether individual or cumulative, including on local communities, natural and historic environments, landscape character and visual amenity, and that the proposals would be compatible with adjacent land uses. Proposed developments will be assessed against the criteria listed within the LDP</p> <p>The 'Argyll & Bute Landscape Wind Energy Capacity Study' (2017) is also a material consideration in the Council's consideration of wind farm applications.</p> <p><u>EIA Scoping</u> - The Council considers that the content of the 'Scoping Report' dated April 2019 is broadly acceptable, and it is considered that the proposed scope of the environmental assessments detailed therein will form a generally appropriate structure for EIA Report preparation. In accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Argyll and Bute Council would recommend that the following information is provided in the Environmental Impact Assessment Report.</p> <p><u>Design</u> - Schedule 4, Part 2 of the EIA Regulations requires an outline of reasonable alternatives (such as technology, location, size and scale) to be considered and the main reasons why the development was chosen, taking into account the environmental effects. The scale and layout of the development should be designed so as to minimise the impact of the development upon key environmental features, significant views and sites designated for their ecological/historical or scenic qualities.</p> <p>The EIA Report should identify the location of all built elements, which should be sited to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development. The assessment should address the construction, operational and decommissioning phases of the development</p> <p><u>Planning</u> - The scope of the Planning and Renewable Energy Policy Context detailed in the Scoping Report is acknowledged. It should be noted that the Council is currently preparing a new Local Development Plan (LDP2), which is due for adoption in 2020. Dependent on intended submission date this may or may not have an impact on the policy assessment.</p> <p>It is considered that the policies detailed within the Scoping Report are appropriate for inclusion, and that consideration should also be given to Policy DM 1: Development within the Development Management Zones, Supplementary Guidance 2 (December 2016), and Supplementary Guidance 2 Wind Farm Map 1 and Wind Farm Map 2 of the Argyll & Bute Local Development Plan</p> <p><u>Vibration & Solar</u> - The Council's Environmental Protection Officer has confirmed that it would be considered appropriate to scope out the operational effects of vibration as well as operational effects from the solar and energy storage elements of the development.</p> <p><u>Solar Glint & Glare</u> - The Scoping Report describes the proposed methodology for assessing solar glint and glare during the operation of the proposed development. Solar panels have varying reflectivity properties; however no solar panel absorbs 100% of incoming light. As a result, solar panels have the potential to produce solar reflection in the form of solar glint (a momentary flash of bright light) and solar glare (a continuous source of bright light). Solar glint will be witnessed by moderate to fast moving receptors whilst solar glare will be encountered by static or slow moving receptors with respect to a solar farm.</p> <p>The Council is generally satisfied with the scope of the proposed assessment, but wonders if consultation should also be undertaken with the Ferry/other shipping operators</p> <p><u>Decommissioning</u> - The Scoping Report states that there is no proposal to limit the lifetime of the proposed development. Therefore, the assessment of all technical areas considers the effects of the operational phase of the proposed development in perpetuity. Should decommissioning of any of the proposed development be required it is considered that any effects would be less than those resulting from construction of the proposed development, and as such this potential for decommissioning has been scoped out of further assessment.</p> <p>The Council does not agree with this approach. As the wind turbine technology itself does not have a perpetual lifespan, it is considered that the effects of decommissioning should not be scoped out of the assessment. Furthermore, that in recognition of the expected</p>	<p>Chapter 3: Proposed Development</p> <p>Chapter 7: Landscape and Visual Impact Assessment</p> <p>Chapter 8: Ecology</p> <p>Chapter 9: Ornithology</p> <p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p> <p>Chapter 12: Access, Traffic and Transport</p> <p>Chapter 13: Noise</p> <p>Chapter 14: Socio-Economics, Recreation and Tourism</p> <p>Chapter 15: Other Issues</p>

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	<p>lifespan of the wind farm, it is considered that any permission should be time-limited to a period reflective of the lifespan of the turbine technology intended to be used. The landscape is a changing landscape which may be different in 25/30 years, taking account of felling, restocking, land management etc. For this reason the Council considers that it is important to continue to have time limited consents.</p> <p><u>Grid</u> - It is noted from the Scoping Report that the grid connection falls under a separate consenting regime and that information on the route of the grid connection will be set out in the EIA Report, but this will not form part of the assessment.</p> <p><u>LVIA</u> - The council notes the Scope and assessment methodology that will be undertaken for the EIAR, including the fact that the effects of solar glint & glare will be assessed as a discrete topic in the EIA Report. The Council also notes that the advice of SNH is to be sought and has no further comment to make in this regard.</p> <p>It is considered that viewpoints should be added to represent visual receptors from recreational watercraft. It is recommended that the advice of SNH and HES is also being sought in this regard.</p> <p>The list of cumulative sites presented in the Scoping Report is comprehensive and there is nothing to add at present, apart from, that there is currently an application to vary the blade length at Beinn an Tuirc three wind farm, albeit this does not affect the height.</p> <p><u>Ecology</u> - The council notes the Scope and assessment methodology that will be undertaken for the EIAR and agrees that it is fit for purpose and appropriate to present guidance.</p> <p>However where a specific ecological or species survey has been scoped out, the Council Local Biodiversity Officer advises that these species should be noted in the CEMP in order to ensure that they remain on the radar.</p> <p><u>Ornithology</u> - The council notes the proposed approach to the evaluation and assessment of the ornithological interest on the site and assessment of potential effects on birds, and agrees that it is appropriate for this type of development. The Council's Local Biodiversity Officer advises that the Argyll Bird Club should be consulted.</p> <p><u>Hydrology</u> - The Council's Local Biodiversity Officer advises that the survey methods for Hydrology, Hydrogeology, Geology & Soils are <u>acceptable</u> but a Peatland Management Plan should be factored in. The Council's Local Biodiversity Officer also advises that the results of the peat probing should inform the position of the turbine and the access network.</p> <p><u>Traffic & Access</u> - The Council's Area Roads Engineer advises that Transport Scotland should be notified as the site entrance connects directly to the A83 Tarbert – Campbeltown Trunk Road.</p> <p>The Area Roads Engineer further advises that they have no objection to the proposal subject to conditions that the site is served by a direct access from the A83 Tarbert – Campbeltown Trunk Road and there is no vehicular access from the B8007 and B842.</p> <p><u>Noise Vibration & Air Quality & Lighting</u></p> <p>Regulatory Issues - The Council's Environmental Protection Officer notes that there are a number of residential properties close to the western boundary of the irregularly shaped site and two properties, Achaglass and Scotmill are within the site or very close to the boundary respectively. The main issues of concern to Regulatory Services would be:</p> <ol style="list-style-type: none"> 1) Operational Noise; 2) Construction Noise and Vibration; 3) Air Pollution, such as dust during the construction phase; 4) Lighting during construction phase; and 5) Private Water Supplies. <p>Assessment Criteria - The response from the Council's Environmental Protection Officer considers noise and vibration. It notes the proposed methodology and outlines a number of information requirement that will need to be included in the EIA report for both operational and construction noise. It is agreed that operational vibration effects as well as operational effects from the solar and energy storage elements of the development can be scoped out of the noise and vibration assessment</p>	

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	<p>Air Quality – Construction - The applicants should consider the potential for dust emissions from the site and access roads/ tracks during the construction phase on any nearby sensitive properties and provide details of any proposed mitigation measure.</p> <p>Lighting – Construction - The applicant should consider the potential for light pollution during the construction phase on any nearby sensitive properties.</p> <p>Vibration - The Council’s Environmental Protection Officer has confirmed that it would be considered appropriate to scope out the operational effects of vibration as well as operational effects from the solar and energy storage elements of the development.</p> <p><u>Land use, Socio-Economic and Tourism</u> - Tourism and recreation are important industries for the economy of Argyll and Bute and the local area. The EIA Report should address the consequences of the development for users of the countryside, and tourism and recreation interests, including any deterrent influence the proposal may have, along with any attractive influence the presence of the proposal may generate. The proposal should not result in the unacceptable loss of amenity to individuals who enjoy recreation pursuits on land or water. The Council recommend that consideration is given to recreational watercraft in the LVIA.</p> <p>It is noted that a Tourism Impact Assessment will be undertaken.</p> <p>Access - At the time of writing no response had been received from the Council's Access Officer.</p> <p><u>Other Issues</u></p> <p>Aviation & Telecommunications - It is noted from the Scoping Report that an assessment of civil and military aviation, defence and telecommunications will be undertaken and will include consultation with the relevant organisations in regard to any potential effect the proposal will have. The Council is satisfied with this approach.</p> <p>Shadow Flicker - It is noted from the Scoping Report that there are no properties within the criteria for assessing shadow flicker effects, and that it is likely that this topic will be scoped out of the detailed assessment in the EIA Report. It is also noted that once the final turbine layout is fixed, if any properties are within 10 rotor diameters, shadow flicker will be scoped back in. The Council is satisfied with this approach.</p> <p>Climate & Carbon Balance - It is noted that a carbon balance calculation will be undertaken and that an assessment of the effects of the proposed development on the ability of receptors to adapt to future climatic conditions will also form part of the climate change assessment. The Council is satisfied with this approach.</p> <p>Population & Human Health - It is noted from the Scoping Report that the assessment of potential health effects will be undertaken in the context of noise, socio-economics and recreation and shadow flicker (where scoped into the EIA). Furthermore, that the assessment will also consider the health effects of dust emissions of construction activities on nearby receptors. The Council is satisfied with this approach.</p> <p>Accidents & Disasters - It is noted from the Scoping Report that the proposed development is not located in an area with a history of natural disasters such as extreme weather events, and that the construction and operations of the proposed development would be managed within the requirements of the relevant Health & Safety Regulations. It is further noted that a screening exercise would be undertaken to identify further detail that may need to be provided. The Council is satisfied with this approach.</p>	
<p>Argyll & Bute Council Environmental Health Officer</p>	<p><u>Noise Vibration & Air Quality & Lighting</u></p> <p>Regulatory Issues - The Council’s Environmental Protection Officer notes that there are a number of residential properties close to the western boundary of the irregularly shaped site and two properties, Achaglass and Scotmill are within the site or very close to the boundary respectively. The main issues of concern to Regulatory Services would be:</p> <ol style="list-style-type: none"> 1) Operational Noise; 2) Construction Noise and Vibration; 3) Air Pollution, such as dust during the construction phase; 4) Lighting during construction phase; and 	<p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils Chapter 13: Noise</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p>5) Private Water Supplies.</p> <p>Assessment Criteria - The response from the Council's Environmental Protection Officer considers noise and vibration. It notes the proposed methodology and outlines a number of information requirement that will need to be included in the EIA report for both operational and construction noise. It is agreed that operational vibration effects as well as operational effects from the solar and energy storage elements of the development can be scoped out of the noise and vibration assessment.</p> <p>Air Quality, Construction - The applicants should consider the potential for dust emissions from the site and access roads/ tracks during the construction phase on any nearby sensitive properties and provide details of any proposed mitigation measure.</p> <p>Lighting Construction - The applicant should consider the potential for light pollution during the construction phase on any nearby sensitive properties.</p> <p>Vibration - The Council's Environmental Protection Officer has confirmed that it would be considered appropriate to scope out the operational effects of vibration as well as operational effects from the solar and energy storage elements of the development.</p> <p><u>Private Water Supplies & Regulatory Issues</u> - The Council's Environmental Protection Officer notes that there are a number of residential properties close to the western boundary of the irregularly shaped site and two properties, Achaglass and Scotmill are within the site or very close to the boundary respectively. The main issues of concern to Regulatory Services would be:</p> <p>5) Private Water Supplies.</p> <p><u>Private Water Supplies</u></p> <p>The proposed development is in an area where residential properties are served by private water supplies. The EHO notes the approach and scope of the proposed hydrological assessment.</p> <p>A note of known private water supplies is available from the Council's Environmental Protection Officer. Where a private water supply is to be provided at the construction site or any facilities in use during the operational phase (for drinking water, toilets etc) details of the source of this supply and any proposed treatment should be outlined (the supply will be required to meet the standard of the Water Intended for Human Consumption (Private Supplies)(Scotland) Regulations 2017).</p> <p><u>Noise Monitoring</u></p> <p>In response to a letter from Hoare Lea, setting out the approach to Noise Monitoring for the proposed development and selection of Noise Monitoring Locations the EHO response was as follows:-</p> <p>"I would support the approach you propose including the methodology for the background noise assessment, use of other sites' data, sites for background monitoring and treatment of cumulative issues. There are a couple of points which I expect will not be significant but you may wish to note when carrying out the cumulative assessment:</p> <ul style="list-style-type: none"> • The turbine at Whitehouse Burn shown on Figure 2 was refused planning permission on appeal. Details can be found on the Council's website at https://publicaccess.argyll-bute.gov.uk/online-applications/search.do?action=simple&searchType=Application under the reference 11/00937/PP. • There is a 100kW turbine operational just to the east of the A83 near Gartnagrenach Farm at 180397 659736. Details can be found on the Council's website at the same link under the reference 14/2630/PP. <p>When the four monitoring sites have been confirmed I would welcome the opportunity to meet with you or your colleague to review the detailed sites at the installation of the monitors."</p> <p>"I was glad to be able to join you in selecting and agreeing the detailed siting of the noise loggers at the four properties on 5 June. I would agree that the sites selected will provide good coverage of the properties potentially affected by the Sheirdrim development and that the micro-siting of the loggers was suitable and consistent with good practice and would minimise the impact of the constraints which may have been present on the properties." Gate check response extract</p>	
Argyll District Salmon Fisheries Board (ADSFB)	Argyll District Salmon Fisheries Board note that the proposed development has some potential to affect watercourses with trout and salmon populations and should therefore undertake fish population, fish habitat and water quality surveys in pre and post construction phases to demonstrate that there has been no deterioration of the fisheries resource as a result of the development. Such surveys need to consider the road and drainage network and how these link to fish habitats downstream of the site.	Chapter 8: Ecology

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Arran Community Council	<p>Arran Community Council are aware of this proposal and we are conscious of the environmental impacts such schemes can have, however the visual impact of large turbines are not to everyone's taste.</p> <p>We would encourage any developer to consider the visual intrusion these developments will have to a tourist dependent community.</p> <p>At this time we have no more to contribute as the scheme will only impact visually for Arran residents and visitors.</p>	Chapter 7: Landscape and Visual Impact Assessment
British Horse Society	<p>BHS recommends that no anemometer should be situated closer than fall over distance plus 10% from any track used, or likely to be used, by horse riders or carriage drivers, and that no associated cables should be situated any closer than 30m from an equestrian route, as the cables may be difficult to see, especially by a startled horse.</p> <p>Design - BHS expects turbine siting and wind farm development plans to respect all existing equestrian access, and to consider opportunities for development of further access wherever possible. This includes access within, across, through and adjacent to sites. Scope to use new tracks constructed to enable turbine erection to link other routes outwith the site is encouraged. BHS Scotland and local riders will be happy to help identify existing riding routes, and to offer suggestions for how access could be improved as an integral part of wind farm development.</p> <p>Where wind farm development or turbine erection results in loss of previously unsurfaced, firm beaten earth tracks enjoyed by horse riders and carriage drivers, BHS expects developers to provide substitute routes of similar length, gradient and character.</p> <p>Please can SPR be encouraged not to obstruct public access and even facilitate it in keeping with their responsibilities as a land manager in this development.</p> <p>Design considerations - The location of individual turbines can have a major impact on horses' response. The following points are worth bearing in mind when considering the equestrian impacts of proposed developments:</p> <ul style="list-style-type: none"> - Horses are generally less concerned by turbines if they are able to acclimatise to the noise and sound as they approach. Turbines in close proximity to a path or track which suddenly come into view without any warning may pose more of a problem. - Blade shadows are not a problem if the turbine is north of the track or path. 	Chapter 14: Socio-Economics, Recreation and Tourism
British Telecom (BT)	<p>Windfarm proposal has been studied with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.</p> <p><u>Telecommunications</u> - BT have studied this Wind farm proposal with respect to EMC and related problems to BT point to- point microwave radio links.</p> <p>The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.</p>	Chapter 15: Other Issues
Energy Consents Unit	<p><u>Content of the EIAR</u> - Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in Annex A of the Scoping Opinion.</p> <p>With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 36 consent is submitted subsequent to this EIA scoping opinion.</p> <p>The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.</p> <p><u>Consent Timescales</u> - The Company indicates at section 2.7 of the Scoping Report that there is no proposal to limit the lifetime of the proposed development. Argyll and Bute Council has stated in their response that it does not agree with this approach.</p> <p>The Scottish Energy Strategy 2017 and the Onshore Wind Policy Statement (OWPS) 2017 set out the Scottish Government's vision for energy in Scotland. OSWP recognizes that there is no current statutory or legislative limits to the duration of consent for a proposed development. The Scottish Government's approach set out in Scottish Planning Policy 2014 is that areas identified for windfarms should be suitable for use in perpetuity.</p> <p>The Company should engage with Argyll and Bute Council to discuss their comments further on this matter, prior to an approach being taken on the application submitted.</p> <p><u>Other Renewable Energy Technologies</u> - The proposed development set out in the Scoping Report refers to wind turbines, solar PV</p>	<p>Chapter 3: Proposed Development</p> <p>Chapter 7: Landscape and Visual Impact Assessment</p> <p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p> <p>Chapter 13: Noise</p>

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	<p>panels and grid technologies including battery storage. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to:</p> <ol style="list-style-type: none"> 1) the scale of the development (dimensions of the wind turbines, solar panels, battery storage. 2) components required for each generating station. 3) minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage. <p>The Company is required to fully assess all effects of each generating station proposed and the Company should engage with the ECU to discuss further the multiple technologies proposed within the development.</p> <p><u>Further Consultation with Statutory Consultees</u></p> <p>Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions</p> <p><u>Mitigation</u></p> <p>The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.</p> <p><u>Conclusion</u></p> <p>The adoption of this scoping opinion by the Scottish Ministers does not preclude them from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of the Scoping Opinion.</p> <p>Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.</p> <p>It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.</p> <p>Applicants are encouraged to engage with officials at the Scottish Government’s Energy Consents Unit at the pre-application stage and before proposals reach design freeze. Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development once an application is submitted.</p> <p>When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.</p> <p><u>LVIA</u> - The scoping report identified viewpoints at Table 5.3 to be assessed within the landscape and visual impact assessment. Argyll and Bute Council has recommended viewpoints should be added to represent visual receptors from recreational watercraft – see response to Q5.2/5.3 at A4.</p> <p>North Ayrshire Council notes that two viewpoints have been selected with North Ayrshire on the isle of Arran. While they are supportive of viewpoints being included in the assessment, they would find it useful if there was justification for the omission of other viewpoints within the study area. In particular, points such as Goatfell and Caisteal Abhail that are located within both Wild Land Area and National Scenic Area see A12.</p> <p>SNH has also recommended a number of additional viewpoint – see 4.2 at A31. The final viewpoints require to be agreed with the Energy Consents Unit in consultation with the Planning Authorities and SNH.</p> <p><u>Scottish Water & Private Water Supplies</u></p> <p>Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the</p>	

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	<p>development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.</p> <p>Scottish Ministers also request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.</p> <p><u>Peat Slides</u> Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures.</p> <p><u>Cumulative Noise</u> - The cumulative noise assessment should be carried out in line with relevant legislation and standards as detailed in section 9 of the scoping report. This should include details about the representative background noise survey locations agreed with the relevant Planning Authority.</p>	
Defence Infrastructure Organisation (DIO/MOD)	<p><u>Aviation</u> - The MOD has no objection to the application.</p> <p>The MOD requests that the cardinal turbines are fitted with MOD accredited 25 candela omni-directional red lighting and infrared combination lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. The remaining perimeter turbines should be fitted with 25 candela omni-direction red lighting or infrared lighting to the same specification.</p> <p>Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.</p> <p>If planning permission is granted we would like to be advised of the following prior to commencement of construction;</p> <ul style="list-style-type: none"> • the date construction starts and ends; • the maximum height of construction equipment; • the latitude and longitude of every turbine. <p>This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area.</p>	Chapter 15: Other Issues
Fisheries Management Scotland (FMS)	<p>The proposed development falls within the district of the Argyll District Salmon Fishery Board, and the catchments relating to the Argyll Fisheries Trust. It is important that the proposals are conducted in full consultation with these organisations (see link to FMS member DSFBs and Trusts below).</p> <p>Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.</p>	Chapter 8: Ecology Chapter 10: Hydrology, Hydrogeology, Geology and Soils
Glasgow Prestwick Airport (GPA)	<p><u>Aviation</u> - GPA consider the scope of the proposed assessments appropriate. Preliminary Line of Sight (LOS) analysis suggests that some of the turbines may be visible to GPA's primary radar – and thus require mitigation.</p>	Chapter 15: Other Issues
Highlands and Islands Airports Ltd (HIAL)	<p><u>Aviation</u> - With reference to the above, our calculations show that, at the given position and height, this development would not infringe the safeguarding surfaces for Campbeltown Airport.</p> <p>However, due to the height of the turbines an omnidirectional steady red aviation warning lights may be required to be fitted at the hub height of some of the turbines.</p>	Chapter 15: Other Issues

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	<p>NATS should be contacted reference the possible proximity to the airways.</p> <p>As a minimum the Civil Aviation Authority (CAA) recommends that all proposed developments over 90m in height should be notified to the CAA.</p> <p>Provided that these conditions are met Highlands and Islands Airports Limited are unlikely to object to this proposal.</p>	
<p>Historic Environment Scotland</p>	<p><u>EIA Methodology</u> - While it does not appear that there are any heritage assets within our remit located within the development site boundary, we consider that the proposals may affect the setting of a number of such heritage assets within the vicinity of the development site.</p> <p>We would therefore recommend that any EIA undertaken in support of the proposals should include a full consideration of impacts on the setting of nearby heritage assets. This is likely to include those heritage assets located within 5km of the proposals identified at Figure 10.1 of the Scoping Report. Of these, we would recommend that particular consideration is given to the potential for impacts on the network of forts and duns located along West Loch Tarbert. These include Dun Skeig, duns & fort (Scheduled Monument, Index no.2491) and Leamnamuic, dun 275m NE of (Scheduled Monument, Index no. 3674) which are located in the vicinity of the development site boundary. See additional information in annex.</p> <p>While we are broadly content with the 5km outer study area proposed within the EIA Scoping Report, we would recommend that ZTV analysis is also applied to identify heritage assets for assessment. We note, for example, that the Category A listed Cour House, Saddell (LB18360) is located shortly outside the 5km outer study area however is likely to have visibility of the proposals. We would therefore recommend that additional consideration is given to the potential for impacts on the setting of nationally important heritage assets located within 10km of the proposals.</p> <p>We note that the EIA Scoping Report proposes scoping out from the detailed assessment those heritage assets not likely to have intervisibility with the proposed development (paragraph 323). Here, we would highlight that impacts on the setting of heritage assets can occur with the appearance of turbines in key views of a heritage asset from a third point. We would therefore recommend that consideration is also given to such impacts before scoping out heritage assets from detailed assessment.</p> <p>We also note that the EIA Scoping Report proposes only assessing those setting effects caused by construction of turbines (Q10.2). Without detailed information regarding the scale and layout of the other renewable energy infrastructure proposed for the site, we are not able to agree this approach. We would therefore recommend that consideration is given to where the additional renewable energy infrastructure may give rise to impacts on the setting of heritage assets as above.</p>	<p>Chapter 11 Archaeology and Cultural Heritage</p>
<p>Joint Radio Company</p>	<p><u>Telecommunications</u> - This proposal cleared with respect to radio link infrastructure operated by: The Local Electricity Utility & Scotia Gas Networks</p>	<p>Chapter 15: Other Issues</p>
<p>Marine Scotland</p>	<p>Marine Scotland Science (MSS) advises that the developer carries out the following:</p> <ol style="list-style-type: none"> 1) site characterisation surveys of watercourses within and downstream of the proposed development area to assess the potential impact of the proposed development on fish populations. MSS advises that the developer consults our generic scoping guidelines (https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren). Information regarding survey/monitoring requirements associated with wind farm developments can also be found in our generic monitoring programme guidelines at the above web site; 2) draws up appropriate site specific mitigation measures including measures to mitigate for the potential impacts associated with felling on water quality and fish populations; 3) establishes a robust integrated water quality and fish population monitoring programme and includes the potential cumulative impact of adjacent developments on fish populations, particularly in the selection of control sites; and 4) contacts the Argyll District Salmon Fishery Board and the Argyll Fisheries Trust, if not already done so, for information on local fish populations and fisheries 	<p>Chapter 8: Ecology</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
Mountaineering Council of Scotland	Mountaineering Scotland has no comment to make regarding the Scoping Opinion request for this windfarm and associated development.	Chapter 14: Socio-Economics, Recreation and Tourism
National Air Traffic Services (NATS) Safeguarding	<u>Aviation</u> - NATS attach some generic guidance which the Applicant can refer to in order to ascertain whether an impact might be anticipated, or in order to engage with NATS under pre-planning.	Chapter 15: Other Issues
North Ayrshire Council	<u>LVIA</u> - While we are supportive of the viewpoints being included in the assessment, it would be useful if there was justification for the omission of other view points within the Study Area. In particular, it would be useful to understand the level of impact from other summits of the higher points such as Goatfell and Caisteal Abhail that are located within both Wild Land Area and National Scenic Area	Chapter 7: Landscape and Visual Impact Assessment
RSPB Scotland	<p><u>Habitat Management</u></p> <p>Habitat Management/Mitigation - The EIA should include details of proposals for mitigation/enhancement in relation to priority habitats and species.</p> <p>We would welcome the restoration of suitable areas to bog/peat and increased planting of native tree species in suitable areas within and surrounding the site for biodiversity gain. Ideally, any off- or onsite compensatory planting required should be included as part of the EIA so the impacts can be assessed. A detailed HMP should be submitted with any application and should include detailed ecological justification for any proposals.</p> <p>We also advise that land use in this area is becoming dominated by windfarms and forestry and so the need to consider cumulative impacts on open habitat loss is paramount.</p> <p><u>Ornithology</u> - RSPB Scotland advises that this proposal has potential to impact on a number of species of birds of conservation concern, particularly Golden eagle, hen harrier, Greenland white-fronted geese (GWFG), red and black-throated diver (listed in Annex 1 of the EU Birds Directive) and black grouse.</p> <p>At this stage we would recommend that the layout of the windfarm tries to avoid open habitats and areas flown through by GWFG focuses upon siting turbines within the forestry so as to minimise biodiversity impacts upon priority species and habitats i.e. key sensitivities such as peat impacts.</p> <p>The RSPB advise that surveys should cover a two-year period this applies particularly to species of conservation concern.</p> <p>The methodology outlined seems to fit guidelines, however much of the work undertaken is now quite old data and advise that survey work should particularly cover the most recent breeding season. For example – in regards to moorland breeding bird surveys and Black grouse no survey work has been undertaken since 2016; scarce breeding bird surveys should cover 2017 and be continuing this year; flight activity watches stopped in 2016 and should have been continued at least for one more recent season; migration watches are old given the variable in migration routes this is liable to have low representation; the goose focal watches should have continued last winter and ideally radar deployed to look at night time movements.</p> <p><u>Cumulative Assessment</u> - Assessment of cumulative impacts from land use change should be considered.</p> <p><u>Survey Requirements</u> - Furthermore, detailed survey work maybe required if the work undertaken highlights issues that merit further consideration. On the whole we would be forced to disagree with Q8 on the approach taken.</p> <p>It is impossible to say currently if the information as collected will be sufficient to inform the application without being able to review the data and methods used.</p> <p>Mitigation - Greenland white-fronted geese (GWFG) - Consideration for mitigation will be required.</p> <p>Golden eagles - Detailed survey work and PAT modelling is required.</p> <p>It is likely that forestry has already impacted eagle ranges in the area, it is remote and hard to survey so long-term data is lacking. Note this Natural Heritage Zone (NHZ) has been identified as one at risk of impacts from inappropriately sited windfarm development in the</p>	<p>Chapter 3: Proposed Development</p> <p>Chapter 8: Ecology</p> <p>Chapter 9: Ornithology</p> <p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p>Golden Eagle Framework: http://www.snh.org.uk/pdfs/publications/commissioned_reports/193.pdf.</p> <p>We recommend that survey work should include data from at least one successful breeding season for both species of eagle to ensure usage of the site can be adequately assessed in the EIAR.</p> <p>Hen Harrier - we would advise that the potential future use of the restructured forestry and open ground around turbines requires careful consideration since draw-in of birds into these areas and collision are distinct possibilities.</p> <p>Divers - Black and Red-throated diver: any proposal should be designed to avoid impacts with turbine (of this size) setback distances of 1km from lochans used by these species. Siting the development within the surrounding forestry should assist in achieving this. Cumulative impacts should be considered, and wider safeguarding applied to the Argyll diver populations. The origin of the Black throated divers using social gatherings in the area is unclear so linkage to the Knapdale lochs SPA population should likewise remain uncertain.</p> <p>Black Grouse - Numerous records occur from the area – although there is limited data collected from across much of this area. We advise that turbines should not be located within 500m of a known lek site. In addition, positive mitigation / management for this species should be undertaken as part of a Habitat Management Plan (HMP).</p> <p>Habitat Management/Mitigation - The EIA should include details of proposals for mitigation/enhancement in relation to priority habitats and species.</p> <p>We would expect mitigation to include timing constraints for construction works to avoid sensitive breeding periods. Consideration should also be given to use of any works related lighting. Mitigation during operation should include lighting which will not attract birds during night-time flights.</p> <p>No turbine lights or lights which are intermittent to reduce attraction. With regards to GWFG, consideration of the use of UV should be considered to reduce any potential collision risk.</p> <p><u>Cumulative Effects</u> - An assessment of cumulative bird impacts in relation to other projects with development consent, or in the planning system, within this NHZ should be undertaken.</p> <p><u>Peatland impacts</u></p> <p>It will be important to avoid deep peat especially in the Class 1 area and a detailed peat mapping exercise is required. The design process, should ensure peat impacts are avoided, and should consider opportunities for restoration and positive management.</p> <p>Carbon calculations for the proposal should be based on the latest version of the Scottish Government’s carbon calculator and should clearly show the carbon payback period for the proposed scheme.</p> <p><u>Forestry</u></p> <p><u>Wind Farm Forest Plan</u> - We request further consultation in regard to the long-term forest windfarm plan and any compensatory planting associated with this proposal. We advise that these should consider measures to enhance forest biodiversity through increased provision of native tree species/open space – including peatland restoration where applicable. Compensatory planting should be seen as an opportunity to deliver priority biodiversity habitats, as well as for priority species (eagles, Black grouse etc) and achieve aims within the Argyll and Bute Woodland and Forestry Strategy.</p> <p><u>Enhancement</u> - We would welcome the restoration of suitable areas to bog/peat and increased planting of native tree species in suitable areas within and surrounding the site for biodiversity gain. Ideally, any off- or onsite compensatory planting required should be included as part of the EIA so the impacts can be assessed. A detailed HMP should be submitted with any application and should include detailed ecological justification for any proposals.</p>	
<p>Scottish Environment Protection Agency (SEPA)</p>	<p><u>Ecology</u> – We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection, the information outlined below and in the attached appendix must be submitted in support of the application.</p> <p>i) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.</p> <p>Site Specific comments include: promotion of peat avoidance principle especially Class 1 Priority Habitat.</p>	<p>Chapter 8: Ecology</p> <p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p><u>Hydrology, Hydrogeology, Geology and Soils</u> - We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection, the information outlined below and in the attached appendix must be submitted in support of the application:</p> <ul style="list-style-type: none"> a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications. b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers. c) Map and assessment of impacts upon groundwater abstractions and buffers. d) Peat depth survey and table detailing re-use proposals. e) Map and table detailing forest removal. f) Map and site layout of borrow pits. g) Schedule of mitigation including pollution prevention measures. h) Borrow Pit Site Management Plan of pollution prevention measures. i) Map of proposed waste water drainage layout. j) Map of proposed surface water drainage layout. k) Map of proposed water abstractions including details of the proposed operating regime. l) Decommissioning statement. <p>Site Specific comments include:</p> <ul style="list-style-type: none"> 1. promotion of peat avoidance principle especially Class 1 Priority Habitat 2. forestry wastes' will only be supported by SEPA when these uses are considered to be beneficial for habitat creation. Depending on the scale of the 'forestry works' the applicant may choose to submit their plans as a dedicated Chapter in the EIA. 3. will expect sufficient detail to be provided in the EIA which will confirm that the site activities will not exacerbate the existing flood risk extent in these areas - existing communities in the vicinity of the site (Clachan). 	
<p>Scottish Forestry</p>	<p>The first consideration for the applicant should be whether the underlying purpose of the proposal can reasonably be met without resorting to woodland removal. The removal of large areas of woodland will not be supported.</p> <p>The EIA Report should include a stand-alone chapter on 'Woodland management and tree felling' (a forest plan) prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs.</p> <p>A long term forest plan should be provided as part of the EIA Report to give a strategic vision to deliver environmental and social benefits through sustainable forest management and describes the major forest operations over a 20 years period.</p> <p>The EIA Report must clearly state that the project will be developed and implemented in accordance with the standard - The UK Forestry Standard</p>	<p>Chapter 15: Other Issues</p>
<p>Scottish Natural Heritage (SNH)</p>	<p><u>LVIA</u> - We consider that the key considerations associated with this proposal to be:</p> <ul style="list-style-type: none"> 1) Landscape and visual impacts including impacts on the North Arran National Scenic Area and Wild Land Area as well as cumulative effects; 2) Ornithological impacts, including direct impacts on Kintyre Goose Roosts Special Protection Area and a golden eagle territory as well as various other Schedule 1 bird species; and 3) Impacts on nationally important carbon-rich soils, deep peat and priority peatland habitat. <p>Our initial advice is that:</p> <ul style="list-style-type: none"> a) The Argyll and Bute Council Landscape Wind Energy Capacity Study 2017 (LWECS) highlights many constraints in relation to a wind farm of this scale and extent in this location and does not support this scale and extent of development in this location; 	<p>Chapter 7: Landscape and Visual Impact Assessment Chapter 8: Ecology Chapter 9: Ornithology Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p>The Energy Capacity Study 2017 (LWECS) highlights many constraints in relation to a wind farm of this scale and extent in this location and does not support this scale and extent of development in this location;</p> <p>b) The proposal should avoid extending the influence of wind farms closer to the coast detracting from the emerging strategic development pattern in the regional area. The proximity to the coast and the scale (height and extent) are key concerns.</p> <p>c) Similarly, cumulative effects with other operational and consented wind farms on Kintyre and on the setting of the North Arran National Scenic Area (NSA) and the North Arran Wild Land Area (WLA), the islands/ seascapes and West Loch Tarbert area are key concerns;</p> <p>d)The proposal is likely to undermine the landscape character, views of/ from and setting of highly sensitive receptors and adversely affect the experience of the area; and</p> <p>e) A proposal of this scale in this highly sensitive location is likely to result in significant adverse landscape and visual effects including cumulative effects. There is a possibility that SNH would object to an application for permission to build a wind farm of this scale in this location.</p> <p><u>Ecology</u></p> <p>We consider that the key considerations associated with this proposal to be:</p> <p>3) Impacts on nationally important carbon-rich soils, deep peat and priority peatland habitat.</p> <p><u>Ornithology</u> - the EIAR should also provide information on Vantage Point (VP) selection and, as there are gaps in the viewshed coverage (as depicted in Figure 8.3), the EIA Report should also clarify whether these gaps cause any issues with the subsequent assessment.</p>	
<p>Scottish Water</p>	<p>Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:</p> <p>Water - There is currently sufficient capacity in the TARBERT Water Treatment Works</p> <p>Foul - Unfortunately, according to our records there is no public Scottish Water, Waste Water infrastructure within the vicinity of this proposed development therefore we would advise applicant to investigate private treatment options.</p> <p>Infrastructure close to boundary - According to our records, the development proposals may impact on existing Scottish Water assets.</p> <p>Drinking Water Protected Areas - A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.</p> <p>Non Domestic/Commercial Property: Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk</p>	<p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p>
<p>Scottish Rights of Way and Access Society (Scotways)</p>	<p>The applicant states 5.2.3 that recreational routes promoted at national and local level are illustrated on Figure 5.5 Recreational Routes. This details the core paths within the Argyle and Bute area and from neighbouring access authorities along with long distance routes, including the above noted Kintyre Way. It does not however detail any recorded rights of way, and while some of these may form part of longer promoted routes they have not been specifically considered within the application.</p> <p>Information regarding recorded rights of way is available from the Society.</p> <p>Study areas of differing distances from the outermost turbines are proposed: if required by the applicant to inform the Environmental Impact Assessment, maps of wider search areas are available from the society.</p> <p>We would like to draw your attention to the following:</p> <p>Extract from the Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8). Proximity to Highways and Railways.</p>	<p>Chapter 14: Socio-Economics, Recreation and Tourism</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p>2.25 It is advisable to set back all wind turbines a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.</p> <p>The documentation provided does not appear to contain any details of the proposed turbine layout so we cannot comment on whether this guidance is being noted. If we have inadvertently overlooked this we would welcome further information from the applicant.</p> <p>The Society is concerned to note that the scoping stage indicates that consent in perpetuity is being sought.</p>	
<p>South Knapdale Community Council</p>	<p>South Knapdale's residents will be mainly impacted by visibility issues:</p> <p>The ZTV maps seem to show that 24 to 26 turbine tips will be visible along the B8024 as it runs East downhill from Carse.</p> <p>The ever increasing, cumulative density of wind farms down the length of Kintyre.</p> <p>The quality of the views available from SK's residents situated along and above West Loch Tarbert will be affected, including the local Area of Panoramic Quality.</p> <p>In particular, Freasdail wind farm is located on the northern edge of SPR's site and the consented Eascairt wind farm (if built) will sit due south of Freasdail on the southern edge of the site - all 3 wind farms could appear as a single entity when viewed from the B8024 between, say, Carse and Torinturk.</p> <p>Q 5.2 - SKCC requires that the visual impact on the South Knapdale APQ as a whole needs to be fully assessed along with the selection of appropriate viewpoints.</p> <p>Q 5.3 - Clustering and cumulative visual impact. SKCC wants this in particular to be specifically assessed as a problem for South Knapdale and the cumulative impact on views from high ground in the APQ and critical sections of the B8024.</p> <p><u>LVA</u> - South Knapdale's residents will be mainly impacted by visibility issues:</p> <p>The ZTV maps seem to show that 24 to 26 turbine tips will be visible along the B8024 as it runs East downhill from Carse</p> <p>The ever increasing, cumulative density of wind farms down the length of Kintyre</p> <p>The quality of the views available from SK's residents situated along and above West Loch Tarbert will be affected, including the local Area of Panoramic Quality</p> <p>In particular, Freasdail wind farm is located on the northern edge of SPR's site and the consented Eascairt wind farm (if built) will sit due south of Freasdail on the southern edge of the site - all 3 wind farms could appear as a single entity when viewed from the B8024 between, say, Carse and Torinturk.</p> <p>Q 5.2 - SKCC requires that the visual impact on the South Knapdale APQ as a whole needs to be fully assessed along with the selection of appropriate view points.</p> <p>Q 5.3 - Clustering and cumulative visual impact. SKCC wants this in particular to be specifically assessed as a problem for South Knapdale and the cumulative impact on views from high ground in the APQ and critical sections of the B8024</p>	<p>Chapter 7: Landscape and Visual Impact Assessment</p>
<p>The Coal Authority</p>	<p>We have checked the site location plan 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.</p>	<p>Chapter 10: Hydrology, Hydrogeology, Geology and Soils</p>
<p>Transport Scotland</p>	<p><u>Site Access</u> - The Scoping Report indicates that the site will be accessed via an existing junction on the A83(T). This junction currently serves a residential property in addition to being a forest access road. It is assumed that this access will be upgraded to serve the proposed windfarm. Full details should be supplied with the EIA submission as Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate this access.</p> <p><u>Access Route</u></p> <p>Any amendments to the trunk road junction will require to be discussed and agreed (via a technical approval process) by the appropriate Trunk Road Area Manager prior to construction. At the application stage, 1:500 scale drawings of what is proposed are required along</p>	<p>Chapter 12: Access, Traffic and Transport</p>

Consultee	Summary of Key Issues	Where Addressed in EIA Report
	<p>with swept path plans for the vehicles that are anticipated to use the access.</p> <p>This study indicates that there are pinch points which will require road amendments to be carried out, however, the Scoping Report does not provide any indication as to where these pinch points are located. Transport Scotland will require to be satisfied that the size of turbine components proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. We would, therefore, request that a full Abnormal Loads Assessment report be provided with the EIAR which identifies any 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.</p> <p><u>EIA Methodology</u></p> <p>Transport Scotland would wish to state that in the EIAR, the methods adopted to assess the likely traffic and transportation impacts on traffics flows and transportation infrastructure, should comprise:</p> <ol style="list-style-type: none"> 1)Determination of the baseline traffic and transportation conditions, and the sensitivity of the site and existence of any receptors likely to be affected in proximity of the trunk road network; 2) Review of the development proposals to determine the predicted construction and operational requirements; and 3)Assessment of the significance of predicted impacts from these transport requirements, taking into account impact magnitude (before and after mitigation) and baseline environmental sensitivity. <p>Where environmental impacts have been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by stating in the report:</p> <ul style="list-style-type: none"> • The work that has been undertaken e.g. Transportation/ Noise / Air Quality Assessments etc; • What this has shown i.e. what impact if any has been identified; and • Why it is not significant. 	
<p>VisitScotland</p>	<p>We would suggest that full consideration is also given to the Scottish Government’s 2008 research on the impact of wind farms on tourism.</p> <p>The report also highlights a request, as part of the planning process, to provide a tourism impact statement as part of the Environmental Impact Analysis.</p> <p>Given the aforementioned importance of Scottish tourism to the economy, and of Scotland’s landscape in attracting visitors to Scotland, VisitScotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full. This includes when taking decisions over turbine height and number.</p>	<p>Chapter 14: Socio-Economics, Recreation and Tourism</p>
<p>West of Scotland Archaeology Service (WOSAS)</p>	<p><u>Direct Issues</u> - The Council’s Archaeological Advisors, the West of Scotland Archaeology Service (WOSAS) advise that the area contains significant recorded archaeology which should be avoided. There is every possibility of there being unrecorded visible remains in the area too and so a walkover survey of the application area is required to help inform the baseline for direct issues raised by the proposals. The ground is not too high for human use and has not been previous forested so the existence and survival of any buried remains is also an issue raised by the proposals.</p> <p><u>Indirect Issues</u> - The setting of all scheduled ancient monuments (SAMs) out to 10km will require to be assessed. The setting of all NSR sites out to 5km will require to be assessed. The setting assessment for the site does not need to consider the effect of the proposals on its significance but rather its setting.</p> <p>The advice of Historic Environment Scotland (HES) should be sought with regard to the approach to assessment of setting effects.</p>	<p>Chapter 11: Archaeology and Cultural Heritage</p>

Gatecheck

The five consultees that responded to the Gatecheck Report, AB&C, Scottish Environment Protection Agency (SEPA), Historic Environment Scotland (HES), North Ayrshire Council (NAC) and Scottish Natural Heritage (SNH) were all satisfied that their views had generally been considered and specified concerns addressed.

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