



Technical Appendix 6.3

Gatecheck Report



Hollandmey Renewable Energy Development

Gatecheck Report

August 2021

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1 Introduction

1.1 Background

1. ScottishPower Renewables (UK) Ltd, trading as ScottishPower Renewables (hereinafter referred to as 'the Applicant') is applying to the Scottish Government's Energy Consents Unit (ECU) for consent and deemed planning permission to construct and operate the proposed Hollandmey Renewable Energy Development (hereinafter referred to as the 'proposed Development').
2. The Site is located approximately 8 km south west of John o' Groats and 16 km east of Thurso, situated within the north eastern part of the Caithness area of the Highlands. The Site lies wholly within the administrative boundary of The Highland Council (THC).
3. The Proposed Development would comprise 10 turbines, with a blade tip height of up to 149.9 m to tip with a combined rated output of around 50 MW, ground mounted solar array with a rated output of around 15 MW and a Battery Energy Storage System (BESS) with a storage capacity of around 15 MW. The Proposed Development would include associated infrastructure comprising:
 - turbine foundations;
 - crane hardstandings;
 - transformer/switchgear housings located adjacent to turbines;
 - access tracks (existing, upgrade of existing or new as required);
 - watercourse crossings (upgrade of existing or new as required);
 - underground electrical cabling;
 - permanent anemometer mast and LIDAR compound;
 - up to two temporary Power Performance Masts (PPM);
 - a construction compound area and a solar compound area;
 - a substation compound;
 - closed-circuit television mast(s);
 - communication mast(s);
 - permanent control building;
 - up to three borrow pit search areas; and
 - health & safety and other, directional site signage.

1.2 Purpose and Structure of Report

4. This Gatecheck Report has been prepared by RSK Environment Ltd (RSK) in line with Section 36 (Electricity Act 1989) application gate-checking procedures, as established by the Scottish Government's ECU.
5. This Gatecheck Report will describe the design evolution of the proposed Development since the scoping stage including, where relevant, changes that have been made in response to consultations and community engagement. The document also sets out the scope of the EIA in advance of the application for consent being made.
6. The report is structured as follows:
 - Section 2 looks at the design of the development, with a site description and design iterations provided;
 - Section 3 describes the scoping consultation;
 - Section 4 describes community engagement, with a summary of public consultation events and outcomes; and
 - Section 5 presents the application details, along with the timeline for advertising and submission of the application.

2 Design of Development

2.1 Site Description

7. The Site is privately owned and covers an area of approximately 1149 ha and is centred on National Grid Reference (NGR) ND 29621 69892. The Site is moorland with commercial forest plantation, open ground between forested areas and woodland livestock grazing. The landform is gently undulating and sloping from an altitude of approximately 79 m Above Ordnance Datum (AOD) in the north east of the Site to 36 m AOD in the north west. Several minor watercourses drain the Site including Burn of Ormigill, Burn of Hollandmey and Link Burn in addition to extensive drainage ditches that connect to these watercourses. There are small lochans in the north east of the Site including a group of lochans in Phillips Mains Mire Site of Special Scientific Interest (SSSI).
8. There are agricultural buildings in the centre of the Site, tracks within and on the edges of the Site, and three abandoned buildings to the south of the Site. There are four non-designated heritage assets including two farmsteads and a fish house in the centre of the Site and a shieling in the south. Lochend Windfarm comprising four wind turbines each 99.5 m in height to blade tip is immediately to the west of the Site.
9. Access to the Site is provided via an existing opening from the C1033 Everly-Crockster Toll Road, which forms a crossroad junction with the West Lodge Road. The access will require to be upgraded to allow for access by construction traffic and abnormal load transporters.
10. The immediate area surrounding the Site is rural with land used predominantly for agriculture and commercial forestry purposes. There is a relatively low population density within the immediate vicinity with few properties located within 1 km of the Site.
11. The proposed Development would require forest restructuring works to enable construction and operation of the renewable energy development.

2.2 Iteration of Design

12. The proposed Development has gone through four principal iterations of the layout (the initial layout and three subsequent iterations), which have been developed at different stages in the project design process. Layouts A to D, shown on **Figure 1**, illustrate the four layouts and visually illustrates how the design and application boundary have evolved through the design stages of the EIA process.

Table 1: Summary of iterations of design

Layout	Description	Design Rationale
A	Initial Layout – First Design Workshop (11 turbines)	<p>RSK conducted a preliminary design study that focussed on potential noise limit constraints associated with nearby residential properties and potential visual impacts. The design study considered THC 'Onshore Wind Energy Supplementary Guidance (2016) and Part 2b (2017)', the decision notice from the refusal of the Lyth Windfarm appeal (November 2013) and the THC pre-application advice for Hollandmey (March 2019). This led to the establishment of the following key design principles:</p> <ul style="list-style-type: none"> • sculptural, linear design; • permeable and rhythmic layout; • avoid northern part of Site because of Site constraints including watercourses and an area with Special Protection Area connectivity; • allow forestry to be retained assisting in low level screening from north; • achieve separation between the windfarm and smaller scale seaboard landscapes;

Layout	Description	Design Rationale
		<ul style="list-style-type: none"> achieve visual association with Lochend and Stroupster Windfarms; minimise increase in turbine envelope when viewed from Dunnet Head SLA viewpoint; balanced and logical appearance in key views; and compact layout in distant views. <p>Early on in the design process, turbines at the greater height of 179 m were considered in detail with comparative visual appraisals made to determine what was considered to be the best balance, taking into account other environmental, technical and commercial constraints. It was decided, as a result of this exercise, that 149.9 m tip height would be the preferred option.</p> <p>The preliminary study yielded a 11 turbine layout. A co-located feasibility study identified potential locations for a solar array and BESS.</p> <p>Following the establishment of the preliminary layout, an internal design workshop was held whereby the layout was scrutinised considering site-specific field data and desk-based environmental studies relating to peat, ecology, ornithology, archaeology and forestry. The evolving design was then subject to an appraisal of potential visual effects and a number of variants of the design considered. Each variant was reviewed against the design principles using wirelines from key viewpoints to further refine the layout. The outcome of the design workshop was an 11 turbine layout (Layout A).</p> <p>This layout formed the basis of direct EIA scoping.</p>
B	Design Iteration 1 – Public Information Event 1 (10 turbines)	<p>Following the first design workshop a landscape appraisal was completed, which included a site visit by the landscape specialist. The findings of the landscape appraisal were considered in combination with further noise assessment to create a preferred ten turbine layout of up to 149.9 m tip height.</p> <p>The decision to remove a single turbine compared to Layout A, was to facilitate a reduction in potential impacts on deep deposits of peat, and to allow re-alignment of the remaining turbines to further reduce such impacts whilst also maintaining the design principles as outlined above. The removal of this turbine also provided additional flexibility to minimise impacts with respect to noise. The preferred layout was then approved by SPR's wind yield team.</p> <p>An environmental appraisal of potential solar locations was conducted and a preferred option area for a solar array and solar compound, and battery storage compound and substation was identified in the north of the Site. This area was chosen because it:</p> <ul style="list-style-type: none"> is located on flat terrain; is a location that avoids and/or minimises potential impacts on known environmental resource; lies in close proximity to the Site entrance and turbine related access track infrastructure. <p>In formulating Layout B, as the turbine locations were becoming more 'definitive' in light of emerging constraints. Layout B was used for the first public information event (PIE).</p>

Layout	Description	Design Rationale
C	Design Iteration 2 – Public Information Event 2 (10 turbines)	<p>Following the establishment of Layout C, with all key constraints identified and turbine locations largely fixed as a result of both these and consultation responses, two key exercises were completed as follows:</p> <ul style="list-style-type: none"> Appraisal of solar array, battery storage compound and substation area (and land-take) to select preferred locations; and Design of ancillary infrastructure including access tracks, crane hardstandings, construction compounds, substation and borrow pits. <p>With respect to the solar infrastructure, BESS and substation the locations identified on Figure 1c were selected for potential development. The locations were chosen because they:</p> <ul style="list-style-type: none"> allows for avoidance of deep peat deposits and need for forestry plantation removal; is afforded significant screening by onsite vegetation/forestry plantation; would be affected by minimal shadowing from both vegetation and proposed turbines; and <p>With respect to ancillary infrastructure, a key focus was the access track design/layout, as well as the number and positioning of borrow pits, construction compounds, and substation. Prior to, and as part of, a second design workshop these elements were designed in accordance with the following design principles:</p> <ul style="list-style-type: none"> utilising existing forestry access tracks as far as practicable; utilising forestry 'breaks' and 'rides' as far as practicable for access tracks; minimisation of forestry plantation removal; restricting any effects on plantation to their leeward side as far as practicable to minimise potential for windblow; minimisation and/or avoidance of deep deposits of peat; where deep peat cannot be avoided by access tracks, adoption of 'floating road' design; minimisation of water crossings; avoidance or minimisation of impacts on environmental resources; location of borrow pits where rock resource is most evident at surface and/or making use of existing ones; reduce potential 'trafficking' across Site with placement of borrow pits and construction compounds; and select optimal location for substation taking account of turbine and solar array infrastructure. <p>A second design workshop was held in order to verify the turbine layout, location and land-take of the solar array infrastructure, and also the ancillary infrastructure supporting both BESS and solar array technologies. The resultant design was then subject to a targeted peat depth investigation, along with a joint site visit to all locations by a project engineer and principal hydrogeologist to take account of local ground conditions, peat depth, topography and the presence of bedrock at or near the surface. Consultations with Scottish Environmental Protection Agency (SEPA) resulted in further alterations to access track design in order to minimise the number of watercourse crossings required and to further minimise impacts on peat.</p>

Layout	Description	Design Rationale
		This design is seen as Layout C in Figure 1c , which was used for the second PIE.
D	Design Iteration 3 – Final Site Layout (10 turbines)	<p>The telecommunications impact assessment (TIA) and scoping consultation with Telefonica had indicated that Turbine 8 (T8) had the potential to impact a microwave link crossing the Site. The TIA had identified mitigation measures which were discussed during further consultation with Telefonica. Feasibility studies including a Line of Sight Assessment and consultation with BT regarding installation of fibre optic cables were undertaken to explore whether the link could be rerouted. The findings of the feasibility studies showed that there was not a technical or commercially viable form of secondary mitigation, so it was decided to mitigate by design. An environmental appraisal was conducted to find an alternative location for T8 and subsequently T8 was moved c.50 m south. Telefonica have confirmed that this location is acceptable.</p> <p>The application boundary was also refined at this stage following provision of information not previously available.</p> <p>This design is seen as Layout D in Figure 1d, which constitutes the final 'Design Freeze' or application layout that forms the basis of this application for consent.</p> <p>Individual assessment Chapters will report their design input in further detail and respond to specific matters, in particular pertaining to the scale of the proposed turbines, the landscape fit of the layout and Criterion 4 to 10 of Highland Council's Onshore Wind Energy Supplementary Guidance.</p>

3 Scoping and Consultation

3.1 Introduction

42. As part of the EIA process, the Applicant conducted informal scoping consultation (direct scoping) with various stakeholders. Scoping consultation was undertaken in order to refine the scope of the assessment of environmental impacts and ensure that it is robust and focussed in its approach on significant effects.
43. In July 2020, Scoping Topic Information Sheets, outlining proposed methodology and approach for assessing effects, and a project information sheet were issued to relevant consultees to seek their views on the scope and content of the EIA for the current proposals. This also provided an opportunity for consultees to provide any initial feedback on the proposals (including any potential environmental concerns they may have regarding the proposed Development) in order for the Applicant to consider these in the final layout and design of the proposed Development. Consultees were also requested to provide any relevant baseline information relating to the Site and the surrounding area that may assist in undertaking the EIA.
44. A direct scoping exercise was undertaken following a prior pre-application consultation exercise completed in 2019 in relation to the potential for a Renewable Energy Development at Hollandmey. The advice received as part of that process covered a lot of the information that would typically be contained in a formal scoping direction and was taken into account when preparing the Project Factsheet and EIA Topic Information Sheets provided to consultees.

45. Direct Scoping allowed a more focused and proportionate consultation to take place by building on the information that had already been identified and gathered for the proposed Development. This approach has been applied successfully on other SPR projects and has achieved the purpose of scoping, namely:
 - identifying important issues and significant impacts to be addressed by the EIA;
 - identifying the key stakeholders, their concerns and their values; and
 - discussing and agreeing appropriate methods of impact assessment including survey methodology where relevant.
46. The scoping responses from consultees were analysed and relevant points were taken forward and used to inform the assessment process and to inform the design process.

3.2 Scoping Consultation

47. **Table 2** provides a summary of the organisations that were contacted as part of the scoping process. These organisations were invited to provide feedback on the scope of the assessment of environmental impacts.

Table 2: Scoping consultees

Consultee	
Statutory Consultees	
Historic Environment Scotland	NatureScot
SEPA	THC
Non-Statutory Consultees	
BAA Edinburgh	BAA Glasgow
British Horse Society	BT
Bower Community Council	Caithness Access Panel
Caithness Archaeology Trust	Caithness Chamber of Commerce
Caithness District Salmon Fisheries Board	Caithness Voluntary Group
Castletown Community Council	Civil Aviation Authority
Crown Estate Scotland	Disability Equality Scotland
Dunnet and Canisbay Community Council	Fisheries Management Scotland
Flow Country Rivers Trust	Glasgow Prestwick Airport
Highlands and Islands Airport Ltd	Highland Biological Recording Group
John Muir Trust	Joint Radio Company
Marine Scotland	Ministry of Defence
Mountaineering Scotland	National Air Traffic Services Safeguarding
North Highland Initiative	North of Scotland Archaeological Society
Office for Nuclear Regulation	Ofcom
Royal Society for the Protection of Birds	Scottish Forestry
Scottish Ornithologists Club	Scottish Squirrels
Scottish Water	Scottish Wildcat Action
ScotWays	Sinclair's Bay Community Council
Telefonica	Transport Scotland
Venture North	VisitScotland
Vodafone	

48. The scoping matrix, which outlines the responses from consultees, including details of the issues raised and the Applicant's response to each issue, is provided as a tabulated summary in **Appendix 2**.

4 Community Engagement

4.1 Overview

49. Public consultation is a key element of the environmental assessment process and, as part of the wider consultation process, attention was given to community engagement, in cognisance of Planning Advice Note (PAN) 3/2010: Community Engagement (Scottish Government 2010). SPR are committed to developing renewable energy responsibly and strive to be good neighbours in all aspects of their work. SPR are committed to the Highlands and to maximising the opportunities for local communities to benefit from their projects. SPR informed the following local community councils of the proposed Development by email in July 2020:

- Bower Community Council;
- Castletown Community Council;
- Dunnet and Canisbay Community Council; and
- Sinclair's Bay Community Council.

50. This coincided with the distribution of a leaflet to all commercial and residential properties within 10 km of the Site, introducing the proposed Development and inviting public comment through the project email address.

51. In addition, consultation has been undertaken with the local communities in the form of PIEs. There are no requirements in the EIA regulations or the Electricity Act for a proposed Section 36 development to host a public event; however, SPR voluntarily held two PIEs to establish dialogue with local communities regarding the proposed Development. Due to the restrictions on face-to-face meeting brought about by the COVID-19 pandemic, alternative web-based consultation measures were utilised. The PIEs were three-week long online events intended to replace the traditional Public Information Days.

52. The two PIEs were held, one in October 2020 and another in January 2021. The first was advertised by an advert in the local newspaper, the John o' Groat Journal the week before it began. Online adverts were also placed on the John o' Groat Journal website (<https://www.johngroat-journal.co.uk/>) and a couple of local interest websites, including caithness.org and caithness-business.co.uk. The local community councils and local councillors were also notified in advance by email and provided with a poster for the event. The second PIE was advertised in both local newspapers, the John o' Groat Journal and Caithness Courier, for two consecutive weeks starting the week before the event began. Online adverts were again placed on the same websites as the first PIE. Local community councils and local councillors were again notified by email and provided with an event poster the week before the event began.

4.2 Public Consultation Feedback

53. The PIEs provided an explanation of the design process, infrastructure/layout, work completed to date, geology including peat, hydrology, transport, archaeology, ecology, ornithology, landscape and visual and noise, and benefits of the proposed Development. Figures and visualisations were presented, which allowed members of the community to gain an understanding of what the proposed Development may look like from key viewpoints and how the constraints were being considered in the design process. There was a feedback form available for members of the community to leave comments for the project team. According to website traffic, there were 192 different people who visited the PIE webpages for the event in October and 142 visitors for the event in January. The number of virtual 'attendees' far exceeded the typical number at traditional public information days so although in-person consultation was not possible, a larger proportion of the local community were able to engage.

54. The feedback provided by the local community highlighted several points which the EIA Report addresses, including:

- impact on property prices;
- flood risk;
- community benefits;
- shadow flicker impacts;

- residential visual amenity; and
- biodiversity.

5 Application Details

55. We expect to lodge the Section 36 application in November 2021 for:

- 10 turbines, of up to approximately 5 MW installed capacity each and a maximum tip height of 149.9 m;
- up to approximately 15 MW installed capacity of ground mounted solar arrays;
- a battery storage area and battery storage units with approximately 15 MW capacity;
- turbine foundations;
- crane hardstandings;
- transformer/switchgear housings located adjacent to turbines;
- access tracks (existing, upgrade of existing or new as required);
- watercourse crossings (upgrade of existing or new as required);
- underground electrical cabling;
- permanent anemometer mast and LIDAR compound;
- up to two temporary Power Performance Masts (PPM);
- a construction compound area and a solar compound area;
- a substation compound;
- closed-circuit television mast(s);
- communication mast(s);
- permanent control building;
- up to three borrow pit search areas; and
- health & safety and other, directional site signage

56. The proposed Development layout is shown in **Figure 2 of Appendix 1**.

57. While subject to confirmation with THC and assuming accordance with the relevant COVID-19 restrictions, it is envisaged that the Environmental Impact Assessment Report (EIA Report) will, on submission of the Section 36 Application, be available for viewing by the public at Thurso Library and Seaview Hotel, John o' Groats. The EIA Report will be available to view for several weeks. The exact time period is to be confirmed with the Energy Consents Unit. In addition, the EIA Report will be made available electronically on the SPR Hollandmey project website and CD and hard copies may be obtained from SPR at a reasonable charge reflecting the cost of making the relevant information available.

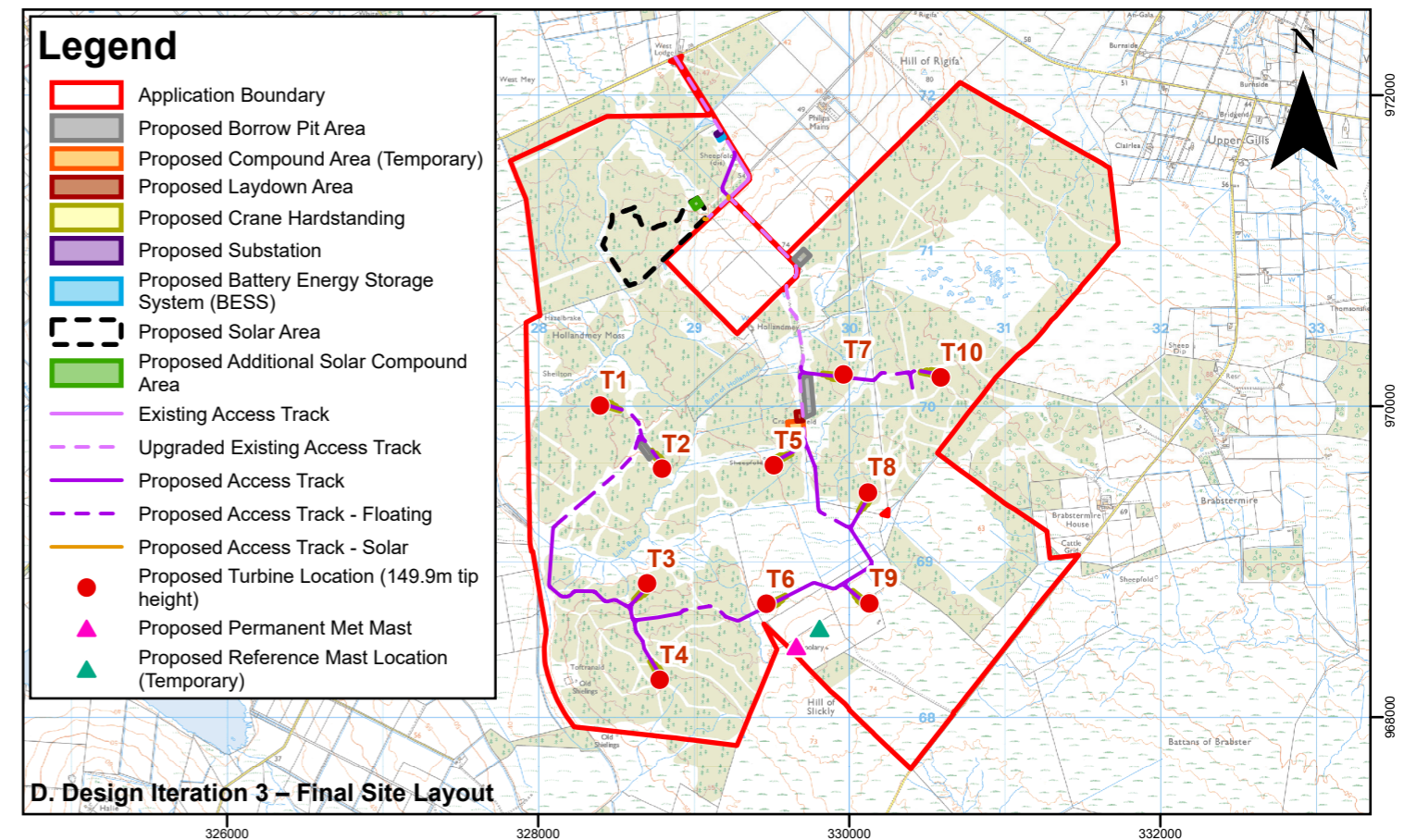
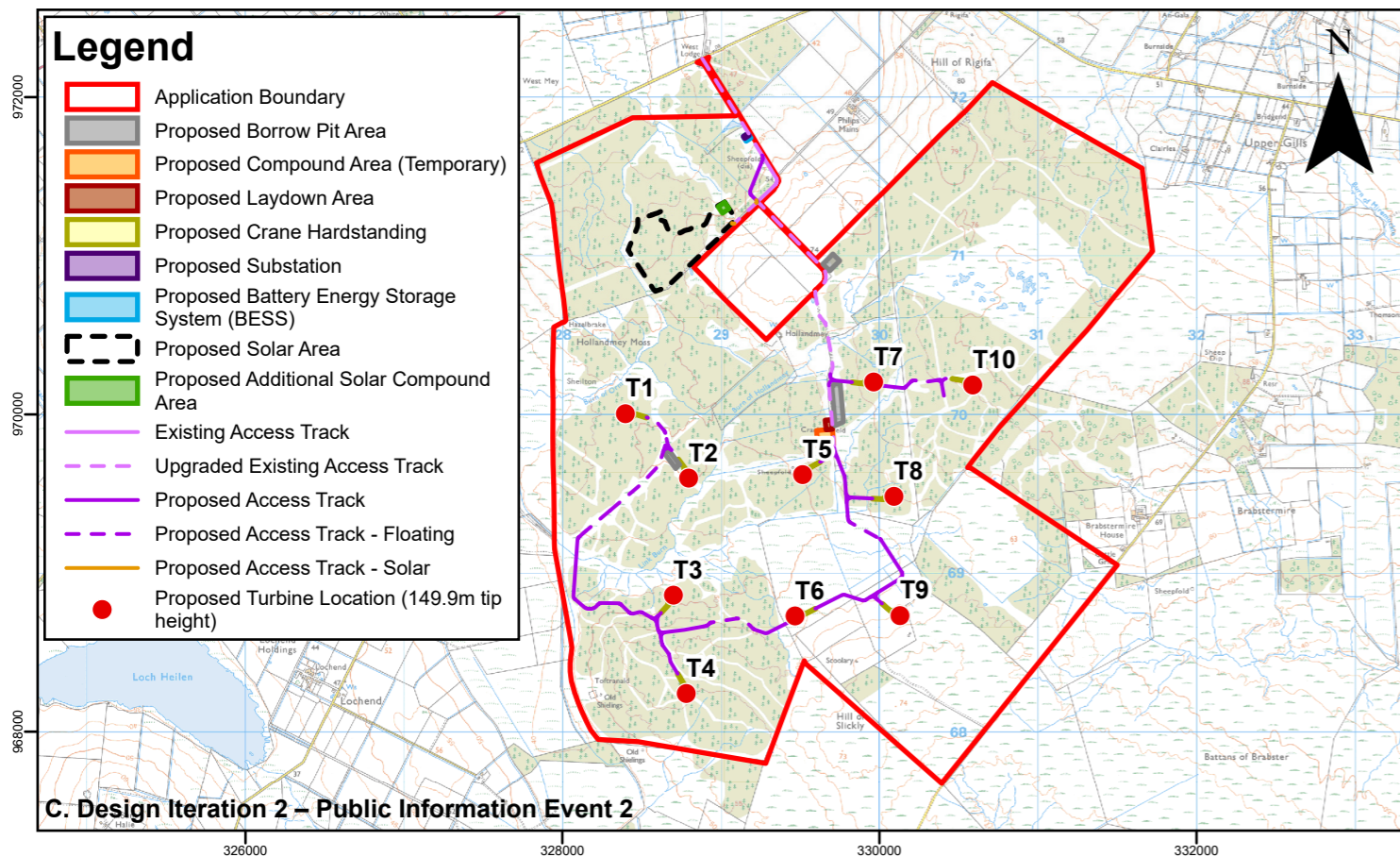
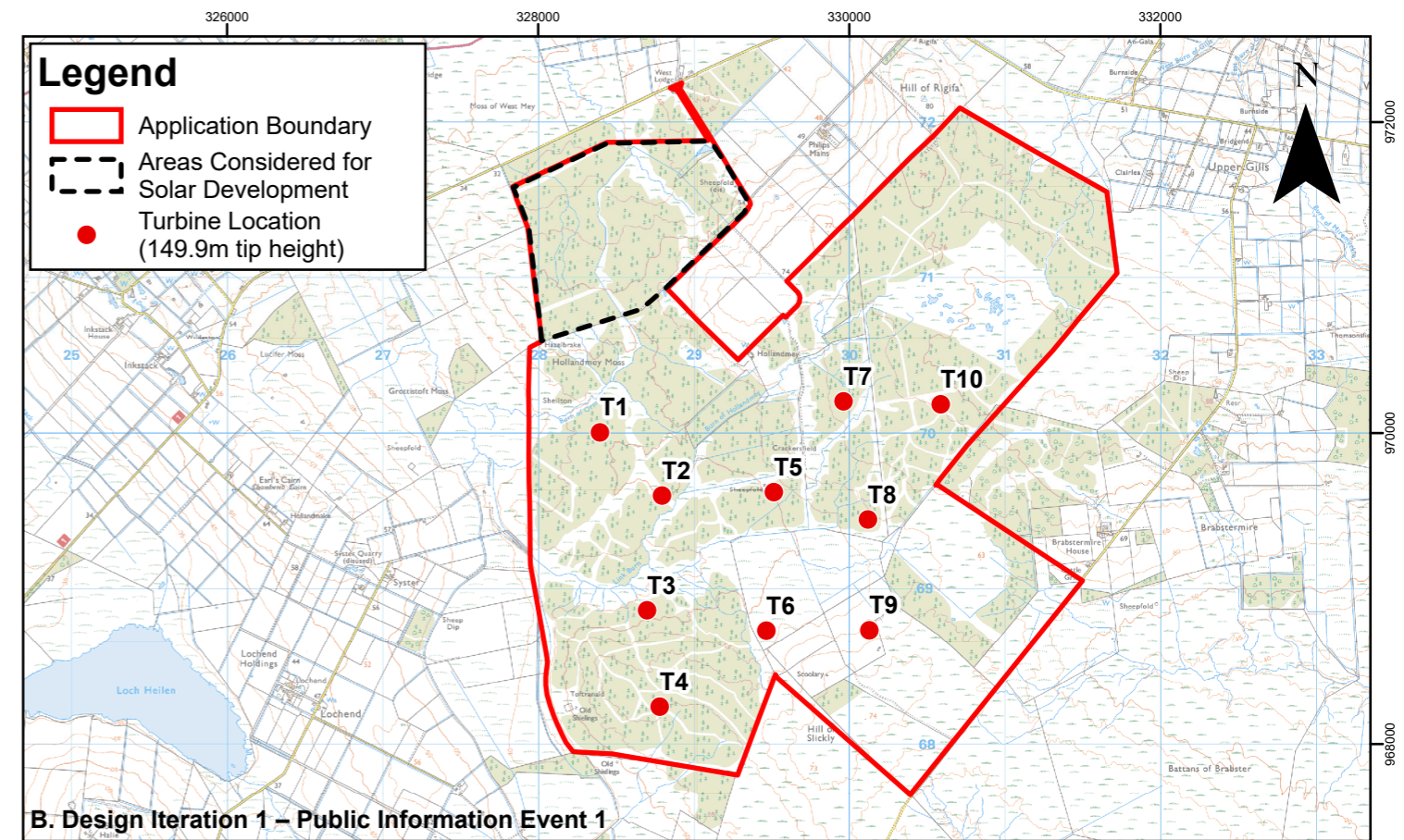
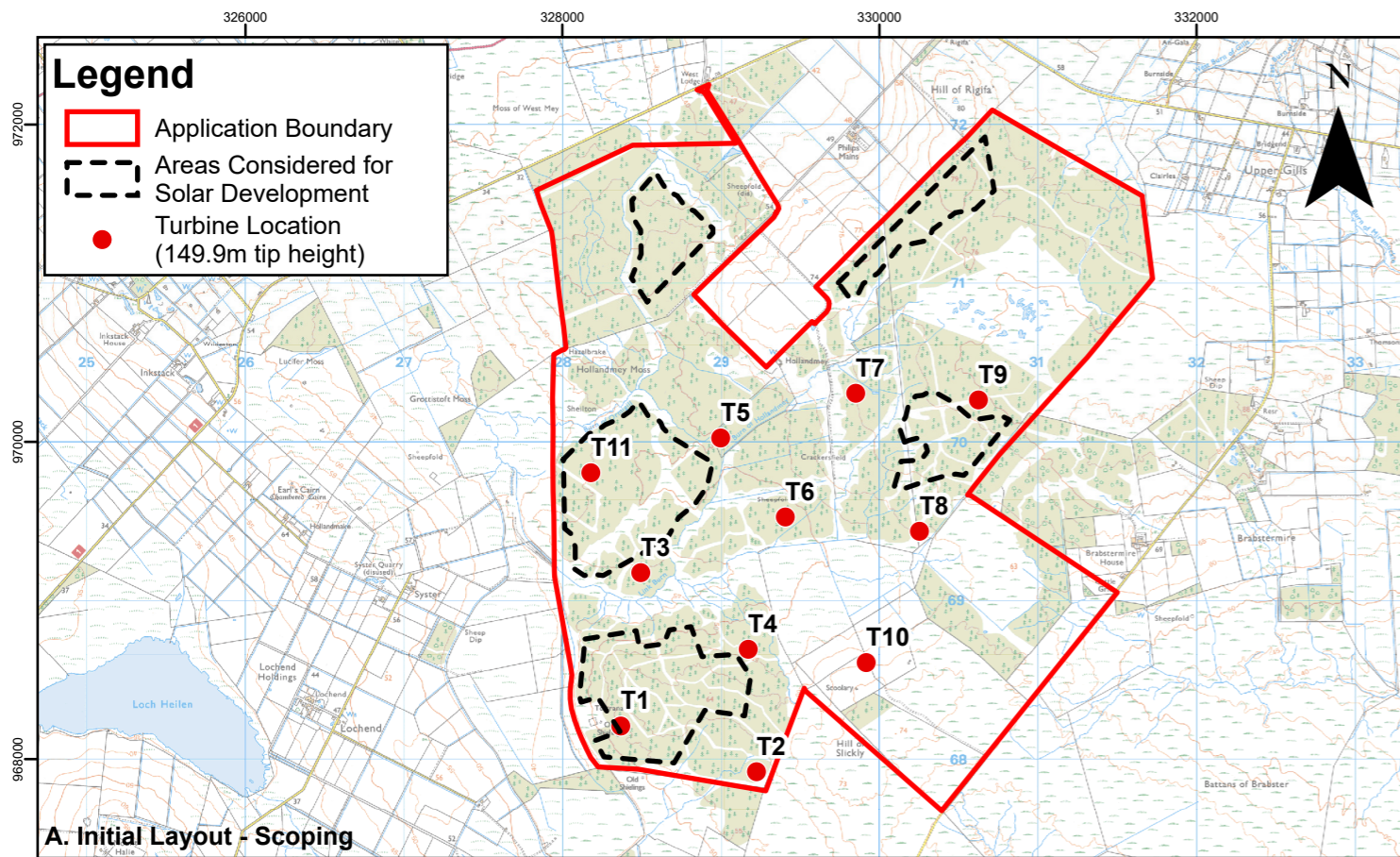
58. The Section 36 Application for consent will be advertised in the Edinburgh Gazette for two weeks, and a local newspaper, the John o' Groat Journal. The dates of publication are yet to be confirmed.

Hollandmey Windfarm Project Team

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320 St Vincent Street
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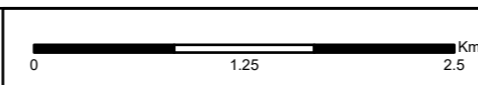
Hollandmeyred@scottishpower.com





Rev	Date	By	Comment
D	11/08/2021	AJ	Iterations updated.
C	01/07/2021	DL	RLB updated.
B	11/11/2020	AJ	Application boundary updated.

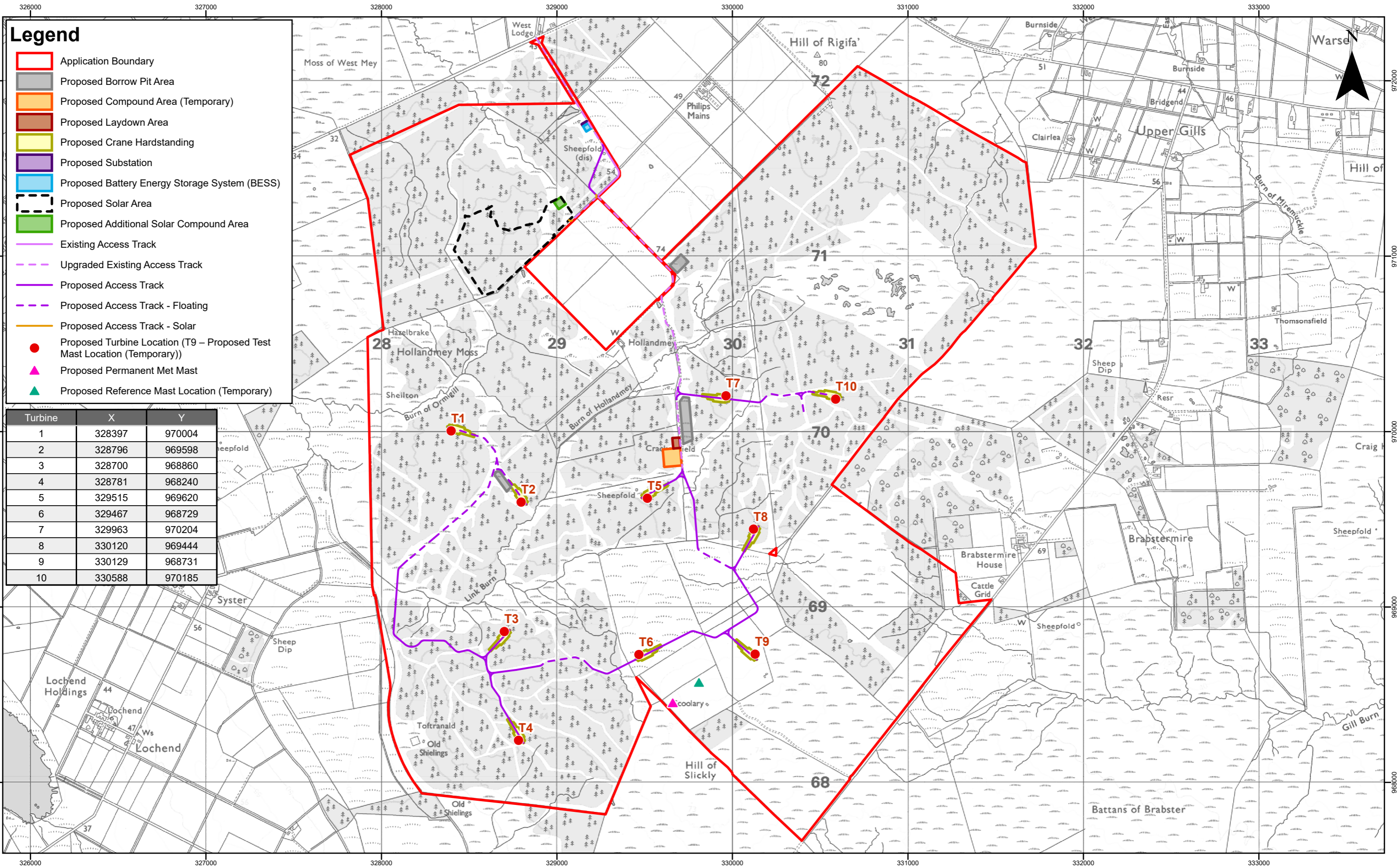
1:45,000
Scale @ A3



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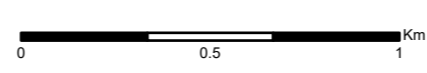
Hollandmey Renewable Energy Development - EIA
Figure 1 Design Iterations

Drg No	HMY_C_079	
Rev	D	Datum: OSGB36
Date	11/08/2021	Projection: TM
Figure	1	



Rev	Date	By	Comment
I	10/08/2021	AJ	Met mast removed.
H	02/08/2021	DL	Infrastructure updated.
G	10/08/2021	AJ	Substation updated.

1:20,000
Scale @ A3



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Hollandmey Renewable Energy Development Figure 2 Proposed Site Layout

Drg No	HMY_C_053	
Rev	I	Datum: OSGB36
Date	10/08/2021	Projection: TM
Figure	2	



Appendix 1

Consultation Matrix

1 Direct Scoping Responses

1. EIA Scoping Topic Information Sheets and a Project Factsheet for Hollandmey Renewable Energy Development were issued directly to stakeholders and consultees listed in Table 1.1 below on 30 July 2020.

Table 1.1: Hollandmey Renewable Energy Development direct scoping responses

Consultee	Method and Date of Consultation	Scoping Comments Received	Applicant Response
Statutory Consultees			
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p><u>Operational Noise</u></p> <p>The applicant will be required to submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSUR- 97 'The Assessment and Rating of Noise from Wind Farms' and the associated Good Practice Guide published by the Institute of Acoustics. The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10 m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12 m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development. While the above are the preferred target levels the guidance does allow scope for a higher daytime limit if the relevant criteria is met.</p>	<p>The noise assessment (Chapter 13: Noise) will be undertaken in accordance with national and local planning policy and following current best practice guidance including the Institute of Acoustics: A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (IoA GPG), which will inform the assessment of operational noise that would be generated by the proposed Development.</p> <p>Based on the assessments undertaken it is expected that operational noise levels from the proposed Development would be within levels deemed, by national guidance, to be acceptable for developments of this nature, on an individual and cumulative basis.</p>
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p><u>Cumulative Noise</u></p> <p>The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. The noise assessment must take into account predicted and consented levels from such developments. Where existing development has consented limits higher than suggested above, the applicant should agree appropriate limits with the Council's Environmental Health Officer.</p> <p>The assessment should include a map showing all windfarm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed. The assessment should include a table of figures which includes the following:</p> <ul style="list-style-type: none"> • the predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12 m/s; • the maximum levels based on consented limits from each existing or consented windfarm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear; and • the predicted levels from each existing or consented windfarm development at each NSL. • the cumulative levels based on consented and predicted levels at each NSL. <p>The assessment should also include a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.</p>	<p>The noise assessment (Chapter 13: Noise) will consider the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Confirmation of the approach to the noise assessment was agreed directly with THC EHO via a Microsoft Teams videoconference call on 25 August 2020.</p>
The Highland Council - Environmental Health Officer	THC Direct Scoping (letter response via email)	<p><u>Noise Exposure</u></p> <p>When assessing the cumulative impact from more than one windfarm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property</p>	<p>When assessing the cumulative impact from more than one windfarm, the noise assessment</p>

Consultee	Method and Date of Consultation	Scoping Comments Received	Applicant Response
██████████	dated 17 September 2020)	subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite.	(Chapter 13: Noise) will consider any increase in exposure time.
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<u>Background Noise Measurements</u> I understand the intention is to utilise previous the results of background monitoring surveys and where required to use these to form a composure background level at some properties. I have no objections to this approach.	Noted
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<u>Amplitude Modulation</u> Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However, at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.	The technical appendix (Technical Appendix 13.1) to the environmental noise assessment will include a discussion of the latest research into amplitude modulation and its relevance to the planning system. This will be in the context of the general approach to the noise assessment.
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<u>Construction Noise</u> Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. Generally, windfarm sites are far enough from noise sensitive premises that construction noise should not be a significant issue and all that may be required is a noise mitigation plan demonstrating that the best practicable measures would be employed. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment. A construction noise assessment will be required in the following circumstances: <ul style="list-style-type: none"> • where it is proposed to undertake work, which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm; or • where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months) If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise'. Details of any mitigation measures should be provided including proposed hours of operation. Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor would employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.	Construction noise will be assessed in the noise assessment (Chapter 13: Noise). The EIA Report will be accompanied by an outline CEMP and a detailed CEMP will be prepared by the Principal Contractor at the detailed design stage, which will set out the method statement for construction and associated noise management measures. This will be subject to approval by THC prior to construction.
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<u>Private Water Supplies</u> The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies, but it is not definitive. An onsite survey will be required.	Consultation with THC was undertaken to identify private water supplies (PWS) and THC supplied PWS information within 5 km of the application boundary. A site visit was also undertaken in August 2020 to obtain an overview of site conditions at the time of the visit and to confirm PWS data.

Consultee	Method and Date of Consultation	Scoping Comments Received	Applicant Response
			As no private water supplies were identified in the area an assessment of the potential impacts and risks on PWS was not required.
The Highland Council - Environmental Health Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<u>Dust</u> Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.	The access, traffic and transport assessment (Chapter 12: Access, Traffic and Transport) will consider impacts caused by dust from construction vehicle movements. A Construction Traffic Management Plan and an outline Construction Environmental Management Plan (CEMP) will be submitted with the EIA Report and will include best practice measures to mitigate potential dust impacts.
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35 mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50 mm and 75 mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape i.e., a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards: https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments Separate volumes of visualisations should be prepared to both Highland Council Standards and SNH guidance. These should be provided in hard copy. It would be beneficial for THC's volume to be provided in an A3 ring bound folder for ease of use. The use of monochrome for specific viewpoints is useful where there are a number of different windfarms in the view. Without seeing wireframes it is not possible to advise on these at this time. We are happy to provide advice on this matter going forward. All existing turbines should be re-rendered even if they appear to be facing the viewer in the photograph to ensure consistency.	A 35 mm format full frame sensor camera was used. Photographs were taken with 50 mm and 75 mm focal lengths. Photomontages provided as part of the landscape and visual impact assessment (LVIA) will follow THC's visualisation standards.
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	This assessment should include the expected impact of onsite borrow pits and access roads, despite the fact that the principal structures will be a primary concern. All elements of a development are important to consider within any EIAR, including the visual impact of the tracks.	The LVIA will assess the impact of the proposed Development which includes all ancillary infrastructure.
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	It should be noted that there are a number of similar applications in this area which are yet to be determined / concluded in the vicinity of this application, which may or may not help clarify the weight towards particular policy elements in the final planning balance. We consider that you should undertake the cumulative assessment over a Study Area the same as the visual assessment, a minimum 45 km Study Area. As this is the case, we recommend that you utilise our interactive Wind Turbine map, which is up to date as of 6 January 2020, to identify other developments within the Study Area. The map can be accessed on the link below and is anticipated to be updated in early 2021: http://highland.gov.uk/windmap Consultation should also be undertaken with Energy Consents Unit to identify any other developments which are currently at Scoping Stage as these may have advanced at the same pace as your proposal.	The cumulative assessment (forming part of the LVIA) will include windfarms within a 45 km study area with a focus on those sites within 30 km. Kirkton Wind Farm is at the scoping stage and will be monitored and would be added to the cumulative baseline if its status were to change to in planning before the proposed Development is submitted for planning permission.
The Highland Council - Landscape Officer	THC Direct Scoping (letter response via email	Viewpoints (VP) for the assessment of effects of a proposed Development must be agreed in advance of preparation of any visuals with THC. At this point we would request the following additional viewpoints:	After further correspondence between RSK and THC, viewpoints were agreed on 16 September 2020, including one on the Far North Railway Line

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[REDACTED]	dated 17 September 2020)	<ul style="list-style-type: none"> from the ZTVs there is theoretical visibility from the Far North railway line through the Sweeping Moorland and Flows as well as along the route between Halkirk and Wick. VP should be somewhere between Altnabreac Station Olgrinmore; and A836 between Thurso and Dunnet to the east of Castletown. <p>We acknowledge that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. We have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography.</p> <p>Please consult us on the viewpoint locations again once the number, size and scale of the turbines has been finalised.</p> <p>As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy developments within the area. The detailed location of viewpoints will be informed by site survey, mapping and predicted ZTVs. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community, and associated reporting on consultation undertaken, take this into account. The final list of viewpoints should be agreed with the Planning Authority.</p> <p>The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view or for assessment of impact on designated sites, communities or individual properties. We are content with a Study Area of 40 km, given the scale of the turbines. Given the size of the turbines and the landscape sensitivities of the Site and the surrounding area, we would expect a detailed assessment of effects should be undertaken for the whole Study Area.</p>	between Altnabreac Station and Olgrinmore and one on the A836 between Thurso and Dunnet to the east of Castletown as requested.
The Highland Council - Landscape Officer [REDACTED]	THC Direct Scoping (letter response via email dated 17 September 2020)	When assessing the impact on recreational routes please ensure that all core paths, the national cycle network, long distance trails, and the North Coast 500 are assessed. It should be noted that these routes are used by a range of receptors.	The LVIA will assess core paths within 5 km of the proposed Development, NCN route 1 (NCN1) and the NC500 where it passes through the study area. There are no long-distance trails in the study area.
The Highland Council - Landscape Officer [REDACTED]	THC Direct Scoping (letter response via email dated 17 September 2020)	The development will further extend the number of proposals of this type in the surrounding area, necessitating appropriate cumulative impact. It is considered that cumulative impact will be a significant material consideration in the final determination of any future application. The Study Area for a cumulative LVIA (CLVIA) should extend to a minimum of 35 km. Given the cumulative impact of renewable energy in this area it is expected that the applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there may be an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined developments in the Council's Panoramic Viewer please see the link below: http://www.highland.gov.uk/panoramicviewer	All images provided as part of the LVIA will be provided to comply with the Council's Panoramic Digital Viewer.
The Highland Council - Landscape Officer [REDACTED]	THC Direct Scoping (letter response via email dated 17 September 2020)	The SNH 2019 landscape character assessment should be used.	The LVIA will use the SNH 2019 landscape character assessment.
The Highland Council - Landscape Officer [REDACTED]	THC Direct Scoping (letter response via email	We expect an assessment of the impact on all potentially effected WLAs to be included within the EIAR given the proximity to a number of WLAs and the theoretical visibility of the proposed Development from within WLAs. SNH will provide further assessment advice on WLAs.	WLAs have been scoped out of the LVIA in agreement with SNH, via email correspondence date 16 September 2020.

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	dated 17 September 2020)		
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	We expect an assessment of the proposal against the criterion set out in the Council's OWESG to be included within the LVIA chapter of the EIAR.	The LVIA will include an assessment against the criteria in the Council's Onshore Wind Energy Supplementary Guidance (OWESG) ¹ .
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. As part of this the impact on the Special Landscape Areas (SLA) must be undertaken using the SLA citations available from the Council's website.	The LVIA assesses the impacts on those SLA likely to be affected by the proposed Development.
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	No aviation lighting is envisaged to be required provided that the turbine heights remain below 150 m. Should this not be the case the effect of the aviation lighting must be assessed through the EIA process and further advice on aviation lighting is available from SNH.	Turbine tip heights have remained below 150 m.
The Highland Council - Landscape Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	Residential visual amenity should be assessed within the LVIA. 3.25 The LVIA must present clear definitions for how the significance of effect for each matter considered in the LVIA chapter of the EIAR has been established. i.e., clear definitions of sensitivity of receptors and magnitude of change. Further to this the EIAR must explain how such matters combine to reach an overall finding of effects of the development.	The landscape technical lead visited local residences to collect baseline data and a residential visual amenity assessment will be included in Technical Appendix 7.2 .
The Highland Council - Landscape Officer ██████████	Email dated 17 August 2020	Confirmed acceptance of proposals for the railway and lay-by viewpoints at the Far North railway line and Moorland and Flows LCT and the A836 between Thurso and Dunnet. On the formatting of visual materials, we ask for the 65.5 degree panoramas in an A3 format not only for ease of use, but for the accessibility of consultees and a wider audience. I think this continues to be important, bearing in mind that the general public should be able to access images as well as Authorities and Consultees, as per para 1.10 of our Visualisation Standard. Therefore, I would prefer to see these included.	Landscape photography has been taken from the agreed viewpoints. The 65.5 degree panoramas will be presented in A3 landscape format.
The Highland Council – Access Officer ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	Public recreation on the Site and landscape impact from the coastline has been highlighted in the 'other issues' section of this scoping report. I have no comments to make at this stage.	Public recreation on the Site will be assessed in the Other Issues assessment (Chapter 15: Other Issues) of the EIA Report. There are no core paths within the application boundary. ScotWays were consulted and stated that there are no known rights of way on the Site.
The Highland Council - Contaminated Land Officer ██████████	Direct Scoping Response (email dated 31 August 2020)	Our records indicate that there is a steading at the central north boundary of the Site (Hollandmey NGR: 329364 970496) which had an asbestos roof, and a sheep dip to the south indicated on the historic map of 1968. These features may have resulted in land contamination. In addition, there are small old quarries shown at NGR 329588 970715 and NGR 330267 971619, along the northern boundary of the Site which, if infilled with degradable waste materials, may cause some minor	No infrastructure would be located near any of the potential contaminated land locations.

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		<p>contamination / ground gas issues. Should new structures be proposed on or adjacent to these locations as part of the development, then further investigation may be required.</p> <p>I therefore recommend that the following condition be attached to any permission granted:</p> <p><u>CN01C</u></p> <p>No development shall commence until a scheme to deal with potential contamination onsite has been submitted to and agreed in writing by the Planning Authority. The scheme shall include:</p> <ul style="list-style-type: none"> the nature, extent and type of contamination onsite and identification of pollutant linkages and assessment of risk (i.e., a land contamination investigation and risk assessment), the scope and method of which shall be submitted to and agreed in writing by with the Planning Authority, and undertaken in accordance with PAN 33 (2000) and British Standard BS 10175:2011+A2:2017 Investigation of Potentially Contaminated Sites - Code of Practice; the measures required to treat/remove contamination (remedial strategy) including a method statement, programme of works, and proposed verification plan to ensure that the Site is fit for the uses proposed; measures to deal with contamination during construction works; in the event that remedial action be required, a validation report that will validate and verify the completion of the agreed decontamination measures; and in the event that monitoring is required, monitoring statements shall be submitted at agreed intervals for such time period as is considered appropriate by the Planning Authority. <p>No development shall commence until written confirmation has been received that the scheme has been implemented, completed and, if required, monitoring measurements are in place, all to the satisfaction of the Planning Authority.</p> <p><u>Reasons – Contamination CN01R</u></p> <p>To ensure that the Site is suitable for redevelopment, given the nature of previous uses/processes on the Site. I advise the Applicant be contacted, with a request that they provide, by way of an assessment of potential contamination issues, site history information concerning the past use of the Site. Please forward any such site history which you receive to the Contaminated Land Team so that we are able to advise if it is sufficient to demonstrate that the Site is suitable for use. Provided the site history is detailed, and does not indicate former potentially contaminative land use, a site investigation may not be required.</p>	
<p>The Highland Council – Forestry ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p>Within the application boundary there are areas of woodland and significant woodland along the access route which may be affected. If any areas of woodland are likely to be affected by the development (including its access) the Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIAR.</p> <p>The EIAR should indicate all the areas of woodland / trees that would be felled to accommodate the development, including any off site works / mitigation. Compensatory woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If so minded, permission is only likely to be granted on the basis that compensatory planting proposals are identified in advance. Compensatory planting should be within the Highland area and not form part of an already approved forestry plan/proposal that has gained FC funding. Areas of retained forestry or tree groups should be clearly indicated and methods for their protection during construction and beyond clearly described. If timber is to be disposed of, details of the methodology for this should be submitted. Generally, THC are content with the methodology and scope of the Forestry chapter of the EIAR, and we do not hold any further information which you do not already have access to.</p>	<p>The design has evolved to minimise the tree felling required while delivering a technically, environmentally and commercially viable layout. Where possible infrastructure has been sited to avoid felling that would create new woodland edges that would be at risk of windblow.</p> <p>The areas of felling, felling volume, and compensatory planting requirement have been calculated and will be presented in the EIA Report (Chapter 15: Other Issues).</p> <p>A keyholing design approach has been taken. The current Forest Design Plan is being used in the preparation of the Windfarm felling and restocking plans.</p>

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			A forestry assessment will be provided in Chapter 15: Other issues . A forestry technical report will be provided as Technical Appendix 15.1 .
The Highland Council – Forestry ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	The development, if granted consent, would likely release carbon throughout the construction period. While the Council note that over time the carbon release on the Site would be balanced by the generation of electricity. It is considered that to offset the carbon release in the construction period that trees could be planted. This should be on an appropriate site located within THC's area and as close as possible to the Site.	The carbon balance assessment (provided in Chapter 15: Other Issues) will include emissions related to construction. The carbon balance assessment, which will be calculated using the Scottish Government's Carbon Calculator Tool, will report the total 'pay back' period. Compensatory planting options will be assessed as part of the EIA process.
The Highland Council – Historic Environment ██████████	Direct Scoping Response (email dated 19 September 2020)	<p>I am generally satisfied that the information presented in the scoping request will adequately address the impact assessment for this proposal. The methodology as set out in the information sheet (4 of 9) is acceptable. However, although direct impacts to known assets will be scoped out, the assessment will need to consider the potential for unrecorded or buried features and deposits to be present that may be impacted. Where impacts are unavoidable, HET expect proposed methods to mitigate this impact to be discussed in detail.</p> <p>I can confirm that I am content to agree the extent of the proposed Study Areas. There are no viewpoints or visualisations recommended here in addition to those proposed in the information sheet.</p> <p>Please let me know if you need anything further at this stage.</p>	<p>The archaeology and cultural heritage assessment (Chapter 11: Archaeology and Cultural Heritage) will consider the potential for unrecorded or buried features and deposits to be present that may be impacted. Where impacts are unavoidable, any proposed methods to mitigate this impact will be discussed in detail.</p> <p>A direct impact assessment will be conducted as part of the EIA.</p>
The Highland Council – Transport Planning ██████████	Direct Scoping Response (email dated 20 August 2020)	<p>Transport planning are generally satisfied with your attached scoping submission.</p> <p>A copy of our earlier pre-application response, ref. 19/00053/PREAPP, is attached for reference.</p> <p>In addition to environmental effects in relation to IEMA Guidelines, we will be particularly interested in the direct impact of construction traffic on the local road network and the mitigation required.</p> <p>In this regard it would be helpful, where possible, if the main sources of construction materials could be identified.</p> <p>With regard to your Consultee Questions:</p> <ul style="list-style-type: none"> • Yes, we are generally satisfied with the proposed methodology and scope of your assessment. • We are not presently aware of any planned road works or improvement schemes, but this position should be confirmed prior to the construction phase of the development. • The need for additional traffic surveys will be dependent on the suitability of available traffic data. • No additional requirements. <p>I trust these comments are sufficient at present, but please get in touch if you require anything further.</p> <p>A MS Teams call was undertaken with the THC Transport Planning Team on 10 August 2021, and it was agreed that a site visit be undertaken to further understand concerns raised regarding what road improvement/mitigation measures might be required on roads that Transport Planning are concerned about. Although it is anticipated that any concerns will be able to be dealt with through a pre-commencement condition further information may be required to be provided as part of the planning application to ensure that the THC Transport Planning are satisfied that any proposed improvement/mitigation measures will be achievable.</p>	<p>The direct impact of construction traffic on the local network and the mitigation required will be discussed in the access, traffic and transport chapter (Chapter 12: Access, Traffic and Transport).</p> <p>It is anticipated that onsite borrow pits will be used to source aggregate, but the EIA Report will consider a worst case scenario of all aggregate being delivered to the Site too.</p>

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The Highland Council – Structures ██████████	Email response dated 8 October 2020	THC structures were consulted directly by RSK initially in September 2020 to discuss the practicalities of Abnormal Load deliveries along several potential routes to site. THC Structures Provided a spreadsheet of the structures along the proposed delivery route. Further discussions are planned to be undertaken with THC Structures following the outcome of a site visit with Transport Planning (date to be confirmed).	A route survey has been undertaken and notes all predicted works at this time. This would be updated as and when required following the site gaining planning consent and would be undertaken in consultation with Transport Scotland.
The Highland Council - Planning ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p>THC request that any EIA submitted in support of an application for the above development take the comments highlighted below into account; many of which are already acknowledged within the Supporting Information. In particular, the elements of this report as highlighted in parts 3, 4 and 5 should be presented as three distinct elements.</p> <p>Where responses have been received by internal consultees these are available to view online and should be taken as forming part of the scoping response from THC. If any further responses are received these will be forwarded on in due course. The following comprises THC scoping response (excluding responses received individually and discussed elsewhere in this table).</p> <p><u>Description of the Development</u></p> <p>The description of development for an EIA is often much more than would be set out in any planning application. An EIA must include:</p> <ul style="list-style-type: none"> • a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e., connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied; • a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; • the risk of accidents, having regard in particular to substances or technologies used; • an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and • the estimated cumulative impact of the project with other consented or operation development. 	<p>The EIA Report will fulfil all of the requirements of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, which include development description, consideration of alternatives, and a description of likely environmental effects.</p> <p>In regard to development description, the proposed Development will include the following infrastructure, which will be assessed in the EIA Report:</p> <ul style="list-style-type: none"> • 10 turbines, of up to approximately 5 MW installed capacity each and a maximum tip height of 149.9 m; • up to approximately 15 MW installed capacity of ground mounted solar arrays; • a battery storage area and battery storage units with approximately 15 MW capacity; • turbine foundations; • crane hardstandings; • transformer/switchgear housings located adjacent to turbines; • access tracks (existing, upgrade of existing or new as required); • watercourse crossings (upgrade of existing or new as required); • underground electrical cabling; • permanent anemometer mast and LIDAR compound; • up to two temporary Power Performance Masts (PPM); • a construction compound area and a solar compound area; • a substation compound; • closed-circuit television mast(s); • communication mast(s); • permanent control building; • up to three borrow pit search areas; and • health & safety and other, directional site signage <p>A figure showing the site layout plan with turbine coordinates will be included in the EIA Report.</p>

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			<p>Chapter 3: Proposed Development of the EIA Report will include a description of the main characteristics of the production processes. In addition, Volume 4: Technical Appendices of the EIA Report will include borrow pit assessment and watercourse crossing assessments.</p> <p>The risk of accidents has been considered and scoped out of the EIA. A brief summary of the issue will be presented in the EIA Report.</p> <p>Each technical subject area, which cover water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc., will provide a description of expected residues and emissions related to their specific topic. Each technical subject area will also conduct a cumulative impact of the project with other consented or operation development.</p>
<p>The Highland Council - Planning ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Alternatives</u></p> <p>A statement is required which outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following:</p> <ul style="list-style-type: none"> • the range of technologies that may have been considered; • locational criteria and economic parameters used in the initial site selection; • options for access; • design and locational options for all elements of the proposed Development (including grid connection); and • the environmental effects of the different options examined. <p>Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.</p>	<p>Chapter 2: Site Description and Design Evolution will include a section on consideration of alternatives which will address the range of technologies considered, initial site selection criteria, access considerations, design iteration and a review of the environmental effects of the different options examined.</p> <p>The carbon emissions related to the proposed Development will be calculated using the Scottish Government's Carbon Calculator Tool.</p>
<p>The Highland Council - Planning ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Environmental Elements Affected</u></p> <p>The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area and you are encouraged to use your understanding of these in assessing your development and the potential for cumulative effects to arise. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.</p>	<p>The technical subject area chapters of the EIA Report will provide a description of the baseline and the potential impacts, followed by an assessment to determine significance of effect. This will include a cumulative assessment, which will be informed by a review of the cumulative site EIA Reports and data included in the THC's turbine list.</p>
<p>The Highland Council - Planning ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Land Use and Policy</u></p> <p>The EIAR should recognise the existing land uses affected by the development having particular regard for THC's Development Plan inclusive of all statutorily adopted Supplementary Guidance (SG). Particular attention should be paid to the provisions of the Onshore Wind Energy SG (OWESG) inclusive of any Landscape Sensitivity Appraisal. This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish</p>	<p>Existing land uses will be described in Chapter 14: Socio-Economics, Recreation and Tourism the EIA Report. The LVIA Assessment includes an assessment against the criteria in the Council's OWESG. In addition to the Planning Statement, the EIA Report will include a chapter on renewable energy and planning policy that will describe the relevant policies; however, only the Planning Statement will include an assessment of</p>

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		Government policy and guidance on renewable energy and wind energy should be considered in this section. The purpose of this chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy.	the proposed Development against the relevant planning policies.
The Highland Council – Planning ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p><u>Sustainability</u></p> <p>The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development. A Sustainable Design Statement is required. Renewable energy developments produce a sustainable form of energy; however, the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development in its entirety is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of sustainable development are fully assessed in the information which supports the application. The renewable energy development needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer needs to consider the impact of the installation and the prospective long-term use of the energy to accommodate the requirements of a decarbonised energy provision for Scotland and the Highlands. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies.</p> <p>Energy storage technology is of interest to the Council as an emerging new aspect of renewable energy developments with considerable potential benefits for energy generation, efficiency and supply. In broad principle the inclusion of infrastructure for energy storage in renewable energy proposals can be supported, given the benefits. Any associated buildings with the renewable energy development must be designed in a way which is sympathetic to the local area and existing pattern of development. However, in considering the detail the Council would need to understand the type and nature of storage facility proposed, such as scale and appearance, and it would be beneficial to have information to explain the specific electricity network benefits and capacity proposed.</p> <p>The developer should also consider the potential for generation of alternative fuels as part of the development. Consideration to be given to an element of local use of the energy and particular use of Hydrogen generation if there is an opportunity in the development for redundancy supply profiles. The Council also encourage the inclusion of electric car charging facilities within all new developments. A strategy for the provision of charging points within the development should be submitted with the application.</p>	<p>The information contained within the technical subject area chapters of the EIA Report and Planning Statement will contain sufficient information to consider the proposed Development against the sustainable design checklist contained within the Sustainable Design Guide SG. The Planning Statement will also assess the proposed Development in the context of relevant development plan policies, including Policy 28 Sustainable Design.</p> <p>The EIA Report will include a socio-economic chapter (Chapter 14: Socio-economic, Recreation & Tourism) that will consider the long term social and economic impact of the proposed Development on a local and national scale. All of the technical subject area chapters will consider the long-term impacts of the proposed Development, which is being applied for in perpetuity. Therefore, matters related to the three pillars of sustainability will be considered in the EIA Report. The carbon balance assessment and planning statement will consider how the proposed Development will contribute to Scotland's climate change targets and wider strategy and policy framework. Discussions are ongoing with THC regarding providing support for the local electric vehicle charging network.</p>
The Highland Council – Planning ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p><u>Ornithology</u></p> <p>The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the planning application process, not as an issue which can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to the comments of SNH and RSPB in this respect.</p> <p>An assessment of the impacts to birds through collision, disturbance and displacement from foraging / breeding / roosting habitat will be required for both the proposed Development and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.</p>	<p>Protected bird species are fully considered in the EIA Report and the comments of NatureScot and RSPB (detailed below) are referenced and considered.</p> <p>The ornithology assessment (Chapter 9: Ornithology) of the EIA Report will include an assessment of impacts to birds including a cumulative assessment where necessary. Survey methods will be detailed.</p>
The Highland Council – Planning ██████████	THC Direct Scoping (letter response via email dated 17 September 2020)	<p><u>Ecology</u></p> <p>The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc) interest onsite. It needs to be categorically established which species are present onsite, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the Site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programme</p>	<p>Baseline surveys for habitats together with protected and notable species have been undertaken to inform the design and assessment of the proposed Development (Chapter 2: Site Description and Design Evolution), in accordance with best practice industry standard guidelines.</p>

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		<p>(such as native- tree planting, stock exclusion, etc) for the Site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.</p> <p>The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed Development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. SNH can also provide specific advice in respect of the designated site boundaries for SACs and SPAs and on protected species and habitats within those sites. The potential impact of the development proposals on other designated areas such as SSSI's should be carefully and thoroughly considered and, where possible, appropriate mitigation measures outlined in the EIAR. SNH provide advice on the impact on designated sites.</p> <p>If wild deer are present or will use the Site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats and other interests.</p> <p>The EIAR needs to address the aquatic interests within local watercourses, including down stream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.</p> <p>Further advice can be found in SNH's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken.</p> <p>The EIAR should include an assessment of the effects on Ground Water Dependent Terrestrial Ecosystems (GWDTE). Please contact SEPA for detailed advice.</p>	<p>A draft Habitat Management Plan (HMP), with a particular focus on the enhancement of onsite blanket bog habitats will be provided.</p> <p>Consideration of whether the proposed Development could assist or impede in the delivery of the Caithness Biodiversity Action Plan (LBAP) through impacts upon LBAP species and habitat interests will be provided in Chapter 8: Ecology and Biodiversity of the EIA Report.</p> <p>The potential for impacts upon qualifying features of relevant statutory designated sites for nature conservation will be assessed, providing adequate information for the undertaking of a Habitats Regulations Appraisal by the relevant Competent Authority</p> <p>A fish habitat survey (Technical Appendix 8.4, Chapter 8: Ecology) will be undertaken to inform the design and assessment of the proposed Development. Consultation has also been undertaken with the CDSFB (as detailed herein).</p>
<p>The Highland Council – Planning</p> <p>██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Water Environment</u></p> <p>The EIAR needs to address the nature of the hydrology and hydrogeology of the Site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration would be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.</p> <p>If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Developments should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.</p> <p>The Council's Flood Risk Management Team had no comments to make at this stage. However, there are a number of watercourses and waterbodies onsite therefore the following applies:</p> <ul style="list-style-type: none"> a minimum of a 50 m buffer of all watercourses / bodies, except water crossings is required; 	<p>Effects on the water environment, groundwater dependent terrestrial ecosystems and on run off will be addressed Chapter 10: Hydrology, Hydrogeology, Geology and Soils of the EIA Report.</p> <p>The design of the proposed Development has avoided unnecessary watercourse crossings. Details of the design of the watercourse crossings will be provided in the Drainage Impact and Watercourse Assessment (Technical Appendix 10.5).</p> <p>SEPA were consulted and provided with an opportunity to comment on the design of the proposed Development in relation to impacts on the water environment.</p> <p>All development work, including construction and operation, is at least 50 m away from watercourses and waterbodies, except where crossings are required. Following a meeting with SEPA on 29 October 2020, it was agreed that drainage ditches that had been identified on the Site would only require a 10 m buffer. Suitable mitigation will be proposed to ensure that there</p>

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		<ul style="list-style-type: none"> access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change; land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and the EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment SG. <p>The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.</p> <p>The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies, but it is not definitive. An onsite survey will be required.</p> <p>It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.</p>	<p>would be no significant effects on the drainage ditches.</p> <p>Natural flood management techniques are used where possible.</p>
<p>The Highland Council – Planning</p> <p>██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Geology, Soils and Peat</u></p> <p>The EIAR must consider the risks of engineering instability relating to presence to peat on the Site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the proposed Development minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.</p> <p>The EIAR should include a full assessment on the impact of the development on peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure but also covering the areas of ground which would be subject to micro-siting limits.</p> <p>SEPA can provide detailed advice on methodology for peat probing and the peat assessment.</p> <p>Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the renewable energy development.</p> <p>The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.</p>	<p>Effects on peat and geology are addressed in Chapter 10: Hydrology, Hydrogeology, Geology and Soils of the EIA Report. A peat slide risk assessment has also been undertaken.</p> <p>Peat probing was also undertaken on all areas where infrastructure is proposed (inclusive of micro-siting allowance).</p> <p>SEPA were consulted and provided with an opportunity to comment on the design of the proposed Development in relation to impacts on peat during a Microsoft Teams videoconference meeting on 29 October 2020.</p> <p>The carbon balance assessment (Chapter 15: Other Issues) will be conducted using the SEPA Carbon Calculator tool, which factors in the release of carbon from disturbance to peat.</p> <p>Embedded mitigation measures including best practice construction methods will be outlined in the EIA Report.</p>
<p>The Highland Council – Planning</p> <p>██████████</p>	<p>THC Direct Scoping (letter response via email</p>	<p><u>Aviation, Radar and Telecoms</u></p> <p>The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future</p>	<p>The Applicant have consulted all relevant stakeholders in relation to aviation, radar and telecommunications. The Applicant have altered the design of the proposed Development to</p>

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	dated 17 September 2020)	<p>application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained within the EIAR to determine whether any suspensive conditions are required in relation to such issues.</p> <p>There should be continued dialogue with HIAL over the impact on the radar at airports in the area.</p> <p>If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.</p>	<p>mitigate potential impacts on a telecommunications link. An assessment of civil and military aviation issues has been undertaken and no issues have been identified that require mitigation or detailed technical assessments. Aviation, radar and telecommunications impacts will be included in Chapter 15: Other Issues.</p>
<p>The Highland Council – Planning</p> <p>██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Socio-Economic, Recreation and Tourism</u></p> <p>We consider that this should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development.</p> <p>In this regard windfarm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.</p> <p>The Site is on land with access rights provided by the Land Reform Scotland Act. The potential impact on and mitigation for public access should be assessed incorporating core paths, public rights of way, long distance routes, other paths and wider access rights across the Site. There are core paths and public rights of way in this area which are likely to be affected during construction and operation phases. In line with the policies and provisions of the Highland-wide Local Development Plan (HwLDP) a plan detailing the following should be submitted as part of the EIAR:</p> <ul style="list-style-type: none"> existing public non-motorised public access footpaths, bridleways and cycleways on the Site and any proposed access route from the public road infrastructure proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water; and impacts of the proposed Development on the core paths and proposed mitigation if any. <p>An Access Management Plan is required to be submitted with the application. Specifically, the EIAR requires to assess the development's potential impact on the Affric-Kintail Way long distance route and other improvements to public access on or near the Site must be considered.</p> <p>Any existing routes should be accommodated before, during and after construction without diversions. If diversions of core paths or rights of way are being considered, then early engagement is recommended to avoid unnecessary delay in the process. The applicant should also be aware that successful orders may be required to legitimately divert rights of way or core paths, that the Council will charge the applicant in the region of £1,500 for each order whether or not they are successful and that if unsuccessful the applicant will have to accommodate public access along the existing paths.</p> <p>The Council's Access Officer has no further comments to make at this stage.</p>	<p>Socio-economics, recreation and tourism will be considered at a local and national scale in Chapter 14: Socio-economics, Recreation and Tourism in the EIA Report.</p> <p>The Applicant and RSK have windfarm development experience in this location.</p> <p>The Applicant would submit an Access Management Plan post consent as a planning condition.</p> <p>ScotWays were consulted and stated that there are no known rights of way on the Site. There are no long distance routes within Caithness so potential impacts have been scoped out of assessment.</p>
<p>The Highland Council – Planning</p> <p>██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Miscellaneous: Health and Safety and Shadow Flicker</u></p> <p>The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and</p>	<p>Consideration was given to potential impacts relating to air quality, population and human health, and vulnerability of the proposed Development to risks of major accidents and disasters. Following the collection of baseline data, no significant effects were predicted so they</p>

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		<p>/ or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the Site.</p> <p>Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.</p> <p>A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application.</p> <p>Given that the final layout for the turbines and the candidate turbine is yet to be selected, a shadow flicker assessment should be undertaken as part of the EIAR. That said, if there are no properties within 11 rotor diameters the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIAR.</p>	<p>have been scoped out of the EIA Report; however, justification will be given in the EIA Report for this.</p> <p>An outline CEMP will be submitted with the EIA Report and will include best practice measures to mitigate potential dust impacts in addition to impacts on the topics discussed above.</p> <p>A shadow flicker assessment (Technical Appendix 15.5) has been conducted and its findings will be presented as a standalone section in Chapter 15: Other Issues.</p>
<p>The Highland Council - Planning ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Significant Effects on the Environment</u></p> <p>Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:</p> <ul style="list-style-type: none"> • the existence of the development; • the use of natural resources; and • the emission of pollutants, the creation of nuisances and the elimination of waste. <p>The potential significant effects of development must have regard to:</p> <ul style="list-style-type: none"> • the extent of the impact (geographical area and size of the affected population); • the trans-frontier nature of the impact; • the magnitude and complexity of the impact; • the probability of the impact; and • the duration, frequency and reversibility of the impact. <p>The effects of development upon baseline data should be provided in clear summary points.</p> <p>The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.</p> <p>The applicant should provide a description of the forecasting methods used to assess the effects on the environment.</p>	<p>The EIA Report will comply with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, which include requirements relating to the description of likely environmental effects.</p> <p>All assessments will be conducted in accordance with the relevant guidance, which include standards for determining and reporting sensitivity of receptor, magnitude of impact and significance of effect.</p>
<p>The Highland Council – Planning ██████████</p>	<p>THC Direct Scoping (letter response via email dated 17 September 2020)</p>	<p><u>Mitigation</u></p> <p>Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reducing and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.</p> <p>The mitigation being tabled in respect of a single development proposal can be manifold. Consequently, the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries</p>	<p>The EIA Report will include a Schedule of Mitigation. This will be provided in Chapter 16: Schedule of Commitments.</p>

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		<p>forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). Further guidance can be obtained at:</p> <p>http://www.highland.gov.uk/NR/rdonlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction_environmental_management_22122010.pdf</p> <p>This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.</p> <p>The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.</p>	
<p>NatureScot (formerly Scottish Natural Heritage)</p> <p>██████████</p>	<p>Email dated 27 August 2020</p>	<p>Provided link to their 'general scoping and pre-application advice' note: https://www.nature.scot/general-pre-application-and-scoping-advice-onshore-wind-farms. This includes information about survey methods, sources of further information and guidance, and data presentation.</p> <p><u>Landscape</u></p> <p>Note that a Wild Land Assessment has been scoped out due to the distance of the Wild Land Areas (WLA) from the Site. Impacts may be possible at distances greater than 20 km so SNH advise on screening in a Wild Land Assessment. SNH can provide further advice once they have received a ZTV.</p> <p>If turbines are likely to require aviation lighting, then SNH would be available to discuss the scope of this assessment.</p> <p>Note the proposal may have potentially significant effects on the Hoy and West Mainland National Scenic Area (NSA). SNH advise that that a Special Landscape Qualities (SLQ) assessment for the NSA should be screened in. SNH can advise further once provided with ZTV.</p>	<p>Landscape lead emailed screening note to NatureScot with a map of WLA overlaid with a tip height ZTV. NatureScot stated they do not expect there to be significant effects arising on the qualities of WLAs and would not expect a wild land assessment. This was agreed via email correspondence dated 16 September 2020.</p> <p>The RSK aviation lead liaised with the aviation technical specialist and it was concluded that the turbines would not require aviation obstacle lighting and any lighting required would use infra-red wavelength lighting that is not visible to the human eye.</p> <p>Landscape lead emailed screening note to NatureScot with a map of NSA overlaid with a tip height ZTV, and a wireline of a proposed viewpoint in the North Hoy and West Mainland NSA which will be used without a photograph for assessing potential effects on the NSA. NatureScot agreed that a full photomontage would not be required. This was agreed via email correspondence dated 16 September 2020.</p> <p>An SLQ assessment has been undertaken in the LVIA.</p>
<p>NatureScot (formerly Scottish Natural Heritage)</p> <p>██████████</p>	<p>Email dated 27 August 2020</p>	<p><u>Ornithology</u></p> <p>Content with the approach to ornithological surveys, which appear to follow SNH guidance. Unable to comment further without seeing the viewshed map and the full survey results in the EIA report.</p>	<p>The viewshed map and survey results will be appended to Chapter 9: Ornithology. Surveys were planned according to NatureScot guidance taking into consideration the qualifying interests of the nearby SPAs and other local bird populations.</p>
<p>NatureScot (formerly Scottish Natural Heritage)</p>	<p>Email dated 27 August 2020</p>	<p><u>Peatland</u></p>	<p>SEPA were consulted and provided with an opportunity to comment on the design of the proposed Development in relation to impacts on</p>

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<p>██████████</p>		<p>Note there is Class 1 peatland onsite; however, it is likely degraded given the presence of the forestry plantation. Should priority peatland habitat be identified onsite then efforts to avoid impacting on this habitat should be considered through siting, design and mitigation.</p> <p>Welcome peat depth survey, outline PMP, CEMP. Additionally, SNH welcome proposals to undertake an NVC; however, advise this should be undertaken at any infrastructure located on priority peatland habitat and not just blanket bog habitat as stated in the scoping document.</p>	<p>peat. Subsequent changes were made to the access track layout and the location of Turbine 2 to mitigate impacts on peat. A Peat Management Plan will be included as Technical Appendix 10.2.</p> <p>A National Vegetation Classification (NVC) survey has been undertaken as part of the ecology assessments (Chapter 8: Ecology). The study area included coverage of all habitats within the Site and out to 250 m, with focus on those habitats likely to represent habitat types listed on Annex 1 of the Habitats Directive or comprising potential Groundwater Dependent Terrestrial Ecosystems (GWDTEs). Further consideration of GWDTEs is provided in Chapter 10: Hydrology, Hydrogeology, Geology and Soils.</p>
<p>NatureScot (formerly Scottish Natural Heritage)</p> <p>██████████</p>	<p>Email dated 27 August 2020</p>	<p><u>Protected Species</u></p> <p>Welcome the proposed protected species surveys. Advise that if any protected species are recorded onsite then species protection plans should be produced and submitted as part of the EIA report.</p> <p>Satisfied for freshwater pearl mussel to be scoped out of the EIA.</p>	<p>Baseline surveys for protected and notable species have been undertaken in accordance with the scope of surveys detailed within the EIA Topic Information Sheet: Ecology.</p> <p>Where required mitigation measures in relation to legislation compliance with regards protected species will be provided within the EIA Report for inclusion within Species Protection Plans (SPPs) within the proposed Development's Construction Environmental Management Plan (CEMP). An outline CEMP will be presented in outline in the EIA Report.</p>
<p>NatureScot (formerly Scottish Natural Heritage)</p> <p>██████████</p>	<p>Email dated 27 August 2020</p>	<p><u>Protected Areas</u></p> <p>Note the Loch of Mey SSSI has hydrological connection with the Site and welcome further consideration of potential impacts to the SSSI arising from this connectivity.</p> <p>Note that part of the Site is located within Phillips Mains Mire SSSI. The EIA report should include appropriate mitigation measures to demonstrate that the proposal would not either directly or indirectly impact on the SSSI.</p>	<p>Design evolution of the proposed Development (Chapter 2: Site Description & Design Evolution) has ensured that no infrastructure is located within the Phillips Mains Mire SSSI and there would be no direct impacts upon this designated site or any other statutorily designated site for nature conservation. Chapter 8: Ecology will consider the potential for significant indirect effects upon the Phillips Mains Mire SSSIs qualifying blanket bog interests and implications for its currently 'Favourable Maintained' conservation status.</p>
<p>Scottish Environment Protection Agency (SEPA) – Ref. PCS/172386</p> <p>██████████</p>	<p>Letter response via email dated 26 August 2020</p>	<p><u>General Overview</u></p> <p>All tracks should be a minimum of 50 m from watercourses, except for watercourse crossings. There might be scope for minor changes to this once the preferred layout has been presented.</p>	<p>SEPA were consulted and provided with an opportunity to comment on the design of the proposed Development in relation to impacts on the peat and the water environment. Subsequent changes were made to the access track layout and a turbine location to mitigate impacts on peat.</p>

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		<p>Before formal submission of the application SEPA recommend further consultation with them. This should include the following layout plans showing all permanent and temporary works: (1) 50 m buffers to watercourses, (2) NVC survey results, and (3) all peat probing results (showing the location of individual peat probes, colour coded for depth).</p> <p>Once NVC and peat probing surveys have been completed they should be submitted for consultation. SEPA can advise on any GWDTE assessment or other work on peat such as the Peat Management Plan.</p> <p>EIA scoping topics information sheets</p> <p>Provided following responses to consultee questions:</p> <ul style="list-style-type: none"> • Spatial Extent <ul style="list-style-type: none"> ○ SEPA are content with the proposed spatial extent of the hydrology, hydrogeology, geology and soils assessment (2 km from proposed infrastructure) and cumulative assessment (5 km from proposed infrastructure). Expect surveys to be carried out in line with current guidance and best practice as appropriate. Depending on the site layout, surveys may need to include areas outwith the application boundary (e.g., for habitats, NVC surveys should extend 250 m from deep excavations). • Flood Risk Assessment <ul style="list-style-type: none"> ○ The majority of the Site is outwith the SEPA Flood Map, except for the riparian corridor along the Link Burn; however, there are several small watercourses onsite. Avoiding development within 50 m of all watercourses should avoid exacerbating flood risk elsewhere. SEPA approve the proposal to undertake a high level screening as part of the EIA and for a Drainage Impact Assessment to be agreed as part of the CEMP. • Solar Park <ul style="list-style-type: none"> ○ SEPA are supportive of solar parks if located appropriately and designed to minimise impacts on the environment. SEPA request that any application be supported by clear descriptive information and plans outlining all infrastructure requirements. ○ The following information would be useful: <ul style="list-style-type: none"> ▪ how the ground would be prepared. For example, whether the whole site would be stripped of vegetation then reinstated or the panels and supporting infrastructure is to be key-holed into the existing vegetation/topography. Even if the Site is not stripped, depending on to the concentration of development proposed, there could be a significant disturbance of land cover and drainage in the area; ▪ the extent of foundations required for the panels and other infrastructure and how they would be formed; ▪ how the cables would be laid. If underground, cable trenches should not act as preferential drainage pathways. This should cover all relevant cabling, including that to the user of the electricity, if this forms part of the application; and ▪ how the Site would be managed during operation. For example, proposals for vegetation management, and panel cleaning and maintenance. Proposals for decommissioning and restoration should also be outlined. <p><u>Detailed scoping requirements</u></p> <p>There may be opportunities to scope out some of the issues below depending on the Site. Evidence must be provided in the submission to support why an issue is not relevant for the Site to avoid delay and potential objection.</p> <p>SEPA are willing to comment on the draft submission.</p> <ul style="list-style-type: none"> • General issues 	<p>All development work is at least 50 m away from watercourses and waterbodies, except where crossings are required. Following a meeting with SEPA on 29 October 2020, it was agreed that drainage ditches that had been identified on the Site would only require a 10 m buffer. Suitable mitigation will be proposed to ensure that there would be no significant effects on the drainage ditches.</p> <p>Effects arising from the solar park and effects on the water environment, GWDTEs, peat, flood risk and drainage impact will be addressed in the EIA Report.</p> <p>A Phase 1 habitat survey and NVC survey have been undertaken. Chapter 8: Ecology will include a Phase 1 habitat plan and an NVC Plan and details of design iteration with regards to the presence of sensitive habitats and GWDTEs.</p> <p>The Site is currently covered by a Long Term Forest Plan approved by Scottish Forestry (SF). The changes to the Plan will be discussed with SF and it is expected that a plan amendment will need to be submitted to SF for approval. A full baseline forestry study has been carried out.</p> <p>All forestry plans and associated work will comply with the UK Forestry Standard and this will be stated in the forestry sections of Chapter 15: Other Issues</p> <p>All watercourses and water bodies will be protected in accordance with Table 6.7.2 of the UK Forestry Standard. It is not intended to use any waste wood on the Site.</p>

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		<ul style="list-style-type: none"> ○ Presume that the plan is being prepared as part of or to support a Forest Grant Scheme application or similar process. If this is the case, then applicant should ensure that the relevant Scottish Government and Forestry Commission Scotland guidance is followed. ○ The Plan should state that the proposals would comply with the UK Forestry Standard and the requirements of the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) and be designed accordingly. The plan should also identify the environmental features of the Site, identifying constraints and opportunities to address. Where these constraints or opportunities have layout implications then this should be demonstrated by way of clear maps. ● Activities which may have adverse effects on the water environment <ul style="list-style-type: none"> ○ The Plan should provide information on how protecting the water environment has been considered when deciding on the location, layout and design of the planting and felling proposals (for example in relation to the timing of works or size of areas felled at the same time). ○ All watercourses and water bodies should be identified as constraints and be protected from forestry operations by open space or suitable riparian planting in line with Table 6.7.2 of the Forestry Standard. These areas should all be clearly marked on the proposal maps. ○ Information should also be provided on whether the existing forest drainage meets current best practice. Where possible the proposal map should identify all areas where existing drains need to be realigned to ensure they do not discharge directly into watercourses. ○ The plan should identify all opportunities for other improvement works such as upgrading of a culvert to allow fish passage, removal of a redundant weir or re-introduction of meanders in artificially-straightened watercourses. ○ The plan should confirm if there are any invasive non-native species (such as the North American signal crayfish, Japanese knotweed, rhododendron and Himalayan balsam) in the plan area and identify their presence as a constraint. If there are invasive non-native species present, the plan should briefly outline proposals for control or removal. ○ The plan should include information on all new infrastructure required (e.g., new or upgraded roads, quarries, temporary welfare facilities or new infrastructure to facilitate public access to the area). This supporting infrastructure should be designed to avoid engineering activities in or impacting on the water environment wherever possible. ● Carbon balance and impacts on peat <ul style="list-style-type: none"> ○ The plan should identify if there is peat on the Site. This can initially be based on soils mapping and local knowledge, but if these suggest that peat is widespread across the Site then suitable survey is required. Areas of deep peat should be shown on the proposal maps. ○ Proposals for replanting in deep peat areas should demonstrate how they comply with the relevant FCS guidance including Deciding future management options for afforested deep peatland and Supplementary Guidance to Support the FC Forestry and Peatland Habitats Guideline Note. New areas of planting should be shown to avoid areas of peat exceeding 50 cm depth and to avoid sites that would compromise the hydrology of adjacent bog habitats. Such avoidance should be demonstrated by superimposing the planting plan on the peat depth mapping information. ○ Proposals for new infrastructure should be shown to avoid areas of deep peat. Where this is not possible then measures to minimise impacts such as floating tracks should be set out on plans. The plan should identify all areas where peatland restoration is proposed, outline the aims of restoration and the methods to be employed to achieve the outlined aims. ● Impacts on wetlands including groundwater dependant terrestrial ecosystems (GWDTE) <ul style="list-style-type: none"> ○ It must be demonstrated that the layout and design of the development minimise impact on GWDTE. SEPA have worked with FCS and the forestry industry to develop forestry-specific guidance on GWDTE - Practice guide for forest managers to assess and protect Groundwater Dependent Terrestrial Ecosystems when preparing woodland creation proposals. This provides further detail on the following requirements. ○ If the plan includes new woodland creation or new tracks or quarries in unforested areas an initial site suitability assessment should be carried out. This should determine the presence and likely extent of potential GWDTE and 	

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		<p>assess the risks that the proposed operations could pose. This involves use of existing data sources such as aerial photographs, GIS and a walkover survey with a competent surveyor. A Functional Wetland Typology for Scotland should be used to identify all wetland areas. Either a) all identified wetland areas should be avoided and protected by buffer areas according to the UK Forestry Standard or b) a National Vegetation Classification (NVC) habitat survey should be completed for all wetlands identified within the development area (borrow pit, road, new planting area) and surrounding survey buffer areas. The survey radius of 100 metres applies where excavation is less than 1 metre and 250 metres where excavation is greater than 1 metre below surface. The results of the NVC survey and Appendix 4 of SEPA Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependant Terrestrial Ecosystems should be used to identify if wetlands are potentially GWDTE.</p> <ul style="list-style-type: none"> ○ Results of these findings should be submitted in the form of a clear plan and supported by a report or field notes on GWDTE habitat condition and botanical richness. The vegetation survey map should be overlaid with a map that clearly details the extent of proposed operations and infrastructure (including excavations) and the proposed avoidance/mitigation measures. The site plan should clearly demonstrate how the results of the habitat survey inform the design of the proposals. ○ For new planting proposals (1) Springs and flushes and botanically rich fens should not be planted on. A buffer of 20 m should be maintained between the forest edge and edge of GWDTE habitat. This buffer may be planted with native broadleaves via hinge mounding. (2) Fens that are not considered to be botanically rich can be planted. (3) Rush pasture, Molinia dominated marshy grassland and wet heath are usually not botanically rich and can be planted, however where botanically rich then planting should be restricted to low density native species if it would enhance the wetland habitat. (4) Degraded, botanically poor GWDTE can be planted. ○ The location of (1) new floating forest roads within 100 m of GWDTE or (2) new cut roads or quarries within 250 m of GWDTE should be reconsidered. If infrastructure cannot be relocated outwith this buffer zone, then the likely impact on them will require further appraisal (see page 26 of SEPA Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependant Terrestrial Ecosystems for further advice on this). The results of this appraisal and necessary mitigation measures should be included in the assessment. ○ Planting of wet woodland, which is also a GWDTE, can help compensate for loss of other types of GWDTE. Such areas should be highlighted on the proposal map. <ul style="list-style-type: none"> ● Use of waste onsite, including felling waste <p>Proposals to make use of any waste wood on the Site should be outlined in the plan. The proposals should comply with SEPA Guidance: Management of Forestry Waste. There must be a clear beneficial use identified for any material left onsite.</p>	
<p>Historic Environment Scotland (HES) – Ref: 300035015</p> <p>██████████</p>	<p>Letter response via email dated 24 August 2020</p>	<p>HES interests cover World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs). The relevant local authority archaeological and cultural heritage advisors will be able to advise heritage assets not covered by HES interests, such as unscheduled archaeology, and category B- and C-listed buildings.</p>	<p>THC have been consulted and their Historic Environment team provided a scoping response.</p> <p>The archaeology and cultural heritage assessment (Chapter 11: Archaeology & Cultural Heritage) will be conducted in line with HES scoping comments. The project Zone of Theoretical Visibility (ZTV) has been used to identify any ‘assets that may be affected’. Further consultation was held with HES to agree on visualisation locations to aid assessment of line of sight and impact on setting.</p>
<p>Historic Environment Scotland (HES) – Ref: 300035015</p> <p>██████████</p>	<p>Letter response via email dated 24 August 2020</p>	<p><u>Potential direct impacts</u></p> <p>Confirm there are no scheduled monuments, category A listed buildings, Inventory battlefields, gardens and designed landscapes or World Heritage Sites within the application boundary.</p>	<p>Response noted.</p>

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<p>Historic Environment Scotland (HES) – Ref: 300035015</p> <p>██████████</p>	<p>Letter response via email dated 24 August 2020</p>	<p><u>Potential impacts on the setting of assets</u></p> <p>There are numerous nationally important historic environment assets in the vicinity of the development whose settings have the potential to be significantly adversely impacted by it. HES have focused on those assets where significant adverse impacts to settings are most likely.</p> <ul style="list-style-type: none"> • Category A listed buildings and Inventory gardens and designed landscapes <ul style="list-style-type: none"> ○ Castle of Mey (LB 1797) and associated garden and designed landscape (GDL 00096) – outstanding historical value because of its association with the Royal Family and the Earls of Caithness. There is an important axial view south from the castle which is significant to the castle’s landscape setting and has been contrived by framing the vista with woodland plantations creating a focused view over the formal lawn to the open land and horizon beyond. The principal rooms are located on the 1st floor of the castle with views to the south, which look out over parkland framed by woodlands. According to the submitted ZTV, the proposed Development would be visible from the castle and extensive areas of the GDL. Turbines may be visible in the important planned view south from the castle, its entrance forecourt and the lawns to the south. This impact would be increased in views from the principal rooms on the 1st floor of the castle. Therefore, consider that the proposed Development would have a significant adverse impact on the setting of both the Category A-listed Castle of Mey and its Inventory garden and designed landscape to a degree that would raise issues of national interest such that HES would be likely to object. The EIAR should assess the impact of the development on the setting of both these assets using the methodology set out in the Managing Change Guidance Notes on Setting and Gardens and Designed Landscapes. Given the potential adverse impacts on both assets, photomontages showing the view from the entrance forecourt to the Castle and from principal rooms on the first floor of the Castle will be required to inform the assessment. Without a turbine layout it is not possible to know whether these potential adverse effects could be successfully mitigated by design. Request further engagement with HES is undertaken once a draft turbine layout and initial visualisations are available to allow HES to provide more detailed advice regarding impacts on the setting of these assets and any potential mitigation options at a useful stage in the process. • Scheduled Monuments <ul style="list-style-type: none"> ○ Earl’s Cairn (chambered cairn N of Hollandmake, Inkstack (SM 449)) - The cairn is located on a low ridge aligned NW-SE and its chamber opening to the ESE suggests a relationship with the wider landscape to the NW and SE. Views along the cairn’s axis, south west to north east, are important to the setting of the monument. The cairn is likely to have been built in a prominent location overlooking surrounding lands associated with its builders and users. Views that allow an appreciation of this may be important to the cairn’s significance. The proposed Development would be around 2 km to the east of the cairn and could affect important views from it. These potential impacts should be assessed through the production of visualisations and a site visit. If adverse impacts are identified these should be mitigated by design, for example through deletion or relocation of proposed turbines. ○ Thomsonsfield (Broch 780 m SW of, Brabstermire (SM588)) - located to the east of the proposed Development and likely to have been built in a prominent, or defensible, position that overlooks surrounding lands associated with its occupants. Views that contribute to an understanding of this may be important to the broch’s significance. The proposed Development would be around 2 km to the west of the broch and could affect important views from it. These potential impacts should be assessed through the production of visualisations and a site visit. If adverse impacts are identified these should be mitigated by design, for example through deletion or relocation of proposed turbines. <p>This list is not considered to be exhaustive, and it is recommended that a wider search is undertaken; any impacts to the settings of assets should be assessed appropriately to determine whether these would be significant. The likely sensitivity of the setting should be used to help determine which sites are assessed in more detail in the EIA Report</p>	<p>Following the scoping response, a site layout plan (14 October 2020) and wirelines (2 November 2020) were provided to HES for comment. HES replied on 20 November 2020 to state that in their opinion there would be a significant impact on the Castle of Mey and its Inventory garden and designed landscape. Discussions are ongoing with HES to discuss potential mitigation for potential impacts on views from the Castle of Mey.</p> <p>In addition, it was requested that an additional visualisation from the Castle of Mey Drawing Room is provided. Furthermore, it was agreed that all visualisations from the Castle of Mey, Earl’s Cairn and Thompsonfield would include photomontages.</p> <p>Site visits to the Castle of Mey, Earl’s Cairn and Thompsonfield have been conducted to aid assessment of impacts on setting.</p>
<p>Historic Environment Scotland (HES) – Ref: 300035015</p>	<p>Letter response via email dated 24 August 2020</p>	<p><u>Potential cumulative impacts</u></p> <p>There are numerous existing, consented and proposed windfarms in both the immediate vicinity and in the surrounding area. HES consider that there is the potential for significant cumulative effects on the setting of the designated assets</p>	<p>Response noted. A cumulative assessments and visualisations will be included in the EIA Report.</p>

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(Victoria Clements)		identified above. Request that appropriate cumulative assessments and visualisations are provided in any EIAR produced, particularly considering the differing turbine heights between cumulative Windfarms and the proposed Development.	
Historic Environment Scotland (HES) – Ref: 300035015 [REDACTED]	Letter response via email dated 24 August 2020	<p><u>Scoping cultural heritage and archaeology factsheet</u></p> <p>Pleased that cultural heritage effects are scoped in, operational effects of the proposal on the setting of cultural heritage assets, as well as direct and indirect impacts from construction, will be assessed, and mitigation for any significant effects will be identified. HES would welcome further consultation as the design of the project progresses to provide advice regarding impacts on the setting of assets at a useful stage in the process. Recommend that HES Managing Change Guidance Note on Setting is used to inform setting assessments. Further information on good practice in cultural heritage assessment can be found in Appendix 1 of the EIA Handbook.</p> <p>Note that a detailed assessment methodology has not been provided. HES can provide advice regarding the proposed methodology before the application is submitted.</p> <p>Note a 5 km study area is proposed to identify nationally important assets that may receive impacts to their settings with further assets between 5 and 20 km only being considered where they are of “exceptional importance and where long distance views are thought to be particularly sensitive”. Unclear what criteria for ‘exceptional’ importance would be applied so HES advise all nationally important assets, including scheduled monuments, up to at least 10 km from the proposed Development should be appraised for potential impacts on their settings. HES do not generally recommend the use of a specific radius to identify assets for inclusion or exclusion in assessments as there is the potential for assets to be missed. Generally, recommend using a ZTV to identify assets which may receive impacts to their settings in the first instance. Recommend consideration should be given to including assets even if the ZTV indicates that no direct intervisibility would be possible because there is the potential for turbines to appear in the background of key views towards these assets. Where potential for adverse impacts on an asset’s setting are identified then it should be taken forward for detailed assessment to identify the scale of impacts. This is likely to require a site visit and, in some cases, production of visualisations. HES would welcome further consultation to approve a proposed list of assets for detailed assessment. This should be informed by a robust appraisal and the results and rationale behind the selection of assets for detailed assessment clearly set out. HES would also be able to provide further advice on what visualisations may be required from the selected assets.</p> <p>Noted the factsheet refers to adverse impacts being mitigated by an appropriate level of survey, excavation, recording, analysis and publication of results and that such investigations can have a beneficial effect by increasing knowledge and understanding, thereby enhancing its archaeological interest and offsetting adverse effects. HES state that such investigations may be appropriate as mitigation in some circumstances; however, they will not always be sufficient to mitigate and offset significant effects. It may be difficult to mitigate impacts on the setting of assets by such investigations. Given that archaeological excavation results in destruction of the physical asset it may be difficult to justify this level of intervention as a beneficial effect in all circumstances.</p>	<p>HES were provided with a site layout plan (14 October 2020) and wirelines (2 November 2020) to consider potential impacts on the setting of assets. Following this, it was agreed to provide an additional visualisation from the Castle of Mey Drawing Room. Furthermore, it was agreed that all visualisations from the Castle of Mey, Earl’s Cairn and Thompsonfield would include photomontages.</p> <p>A ZTV was used to identify any heritage assets that may be affected by the operation of the proposed Development i.e., through effects on their settings and the contribution made to their cultural significance. Assets have been included in the assessment based on the level of importance assigned to the asset, so as to ensure that all significant effects are recognised. All nationally important assets, including scheduled monuments, up to at least 10 km from the proposed Development will be appraised for potential impacts on their settings.</p> <p>Site visits to the Site and the surrounding cultural heritage assets including the Castle of Mey, Earl’s Cairn and Thompsonfield have been conducted to aid assessment of direct and indirect impacts and impacts on setting.</p>
Historic Environment Scotland (HES) – Ref: 300035015 [REDACTED]	Letter response via email dated 24 August 2020	<p><u>Scope out</u></p> <p>HES agree that direct effects on assets within their remit can be scoped out but recommend consulting local authority regarding unscheduled historic assets. HES agree setting impacts during construction stage can be scoped out because they would be short-term and temporary.</p> <p>HES asked for clarification on what indirect effects includes before they can agree to them being scoped out.</p> <p>HES recommend consulting with local authority before scoping out effects on Category C listed buildings.</p> <p>HES do not agree to scoping out operational effects on setting of designated assets within 5 km because there is no confirmed turbine layout or list of assets proposed to be scoped out.</p>	<p>Response noted. THC have been consulted and their Historic Environment team provided a scoping response. Category C listed buildings have been scoped out as the one Category C building within the study area is located in a wooded setting and the group value with other associated listed buildings would remain unaffected by the proposed Development.</p> <p>Indirect effects include secondary processes, triggered by the proposed Development, that lead to the degradation or preservation of heritage assets. For example, changes to hydrology may affect archaeological preservation; or changes to</p>

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			<p>the setting of a building may affect the viability of its current use and thus lead to dereliction. The EIA has considered the potential for indirect effects.</p> <p>The study area has been the subject of previous archaeological investigations. In addition to the known heritage assets recorded by the Historic Environment Records and identified at Scoping, the previous investigations have identified further assets. The results of these surveys, along with the further studies carried out for the EIA, provide a thorough understanding of the archaeological and historical assets which survive upstanding within the study areas. The EIA will also consider whether there are areas of the Site with potential for previously unrecorded heritage assets to survive.</p> <p>THC were provided with a proposed site layout plan (14 October 2020) and visualisations from key cultural heritage receptors (2 November 2020). Potential operational effects on setting of designated assets will be included in the EIA.</p>
<p>Historic Environment Scotland (HES) – Ref: 300035015</p> <p>██████████</p>	<p>Letter response via email dated 24 August 2020</p>	<p><u>Further information</u></p> <p>The Historic Environment Policy for Scotland (HEPS 2019) was adopted on the 01 May 2019 and replaced the Historic Environment Scotland Policy Statement (HESPS 2016). The HEPS 2019 is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes HES's Managing Change in the Historic Environment Guidance Notes, which are available online at www.historicenvironment.scot/heps.</p> <p>Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). Technical advice is available on HES's Technical Conservation website at http://conservation.historic-scotland.gov.uk/.</p>	<p>Response noted. Guidance has informed EIA.</p>
<p>Historic Environment Scotland (HES) – Ref: 300035015</p> <p>██████████</p>	<p>Letter response via email dated 24 August 2020</p>	<p><u>Summary</u></p> <p>Based on the information provided, HES consider there is the potential for significant adverse effects on the setting of numerous nationally important designated assets located in the vicinity of the Site. These potential adverse effects might merit an objection. HES can provide further advice as further information such as visualisations and a turbine layout become available and recommend that further consultation with HES is undertaken during the design process, so advice is provided at a useful stage.</p>	<p>Further consultation received from HES via email dated 29 January 2020 confirmed that HES consider that the proposed Development would have a significant effect on the setting of the Castle of Mey. Discussions are ongoing with HES to discuss potential mitigation for potential impacts on views from the Castle of Mey.</p>
Non-Statutory Consultees			
<p>BAA Edinburgh</p> <p>██████████</p>	<p>Email dated 10 August 2020</p>	<p>The proposed Development is outwith the Safeguarding Consultation zone for Edinburgh Airport, so BAA Edinburgh have no comment to make.</p>	<p>No action required</p>
<p>BAA Glasgow</p>	<p>Email dated 4 August 2020</p>	<p>The proposed Development is outwith the Safeguarding Consultation zone for Glasgow Airport, so BAA Glasgow had no comment to make.</p>	<p>No action required</p>

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[REDACTED]			
Bower Community Council [REDACTED]		No response received.	No action required.
BT [REDACTED]	Email dated 11 August 2020	<p>The Site could cause interference to BT's current and presently planned radio network. There are 8 x BT radio network links that could be potentially affected.</p> <p>BT would object to future development of this proposal if it strongly interfered with the existing BT radio links.</p> <p>BT require ideally 100 m minimum clearance from the Blade tip to the link path to avoid interference.</p> <p>Once specific Turbine locations are known, BT can reassess whether they would cause interference.</p>	Design evolution of the proposed Development (Chapter 2: Site Description and Design Evolution) has ensured that turbines have been sited to avoid impacts on BT radio links. A telecommunications impact assessment was conducted to confirm that there are no potential effects. Telecommunications impacts are considered further in Chapter 15: Other Issues . A telecommunications assessment is provided as Technical Appendix 15.4 .
Civil Aviation Authority – Airspace [REDACTED]	Email dated 1 August 2020	Do not comment on scoping applications.	No action required.
Caithness Access Pane [REDACTED]		No response received.	No action required.
Caithness Archaeological Trust [REDACTED]		No response received.	No action required.
Caithness Chamber of Commerce [REDACTED]		No response received.	No action required.
Caithness Voluntary Group [REDACTED]		No response received.	No action required.
Caithness District Salmon Fishery Board (CDSFB) [REDACTED]	Email dated 1 August 2020	<p>CDSFB is confident that the proposed Development has no implications for fisheries.</p> <p>The Site does impinge on several small streams that feed the Rattar Burn, which enters the sea just to the west of Skarfskerry.</p> <p>CDSFB has no survey information on the fish populations that these streams may support. However, all these streams probably contain brown trout, eels and, perhaps, lampreys; none of the streams are likely to support salmon.</p>	A fish habitat survey (Technical Appendix 8.4, Chapter 8: Ecology) will be provided to confirm the presence of any potentially important habitats for fish species within the Site.
Castletown CC [REDACTED]		No response received	No action required.

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Crown Estate Scotland ██████████	Email dated 28 August 2020	Crown Estate Scotland have no comment to make because their assets are not affected by the proposed Development.	No action required.
Dunnet & Canisbay CC ████████████████████		No response received	No action required.
Fisheries Management Scotland ██████████		No response received.	No action required.
Flow Country Rivers Trust ██████████		No response received.	No action required.
Glasgow Prestwick Airport (GPA) ██████████	Email dated 6 August 2020	The proposed Development is outwith the windfarm safeguarding area of interest for GPA. GPA would be extremely unlikely to object to this development on aviation grounds.	No action required.
Highland Biological Recording Group (HBRG) ██████████	Email dated 31 July 2020	HBRG have biological data for the area that can be provided at a charge. Recommend using HBRG data because it is good practice for an environmental assessment of a development of this nature. HBRG do not get involved in assessing developments to keep their role in data provision completely neutral so will not comment on the proposed Development.	Existing records of non-statutory designated sites, protected and notable species have been used to inform the scope of baseline ecological surveys (Chapter 8: Ecology) and to inform the design and assessment of the proposed Development (Chapter 2: Site Description and Design Evolution).
Highlands and Islands Airports (HIAL) ██████████	Letter response via email dated 26 August 2020	Due to potential regulatory reform regarding surveillance HIAL have deferred the procurement of a surveillance solution. This impacts HIAL's Air Traffic Management Strategy (ATMS) combined surveillance and remote tower project at Dundee, Kirkwall, Stornoway, Sumburgh and Wick Airports. The uncertainty over what the future surveillance solution will be means HIAL cannot satisfactorily assess the impact of a windfarm development on surveillance. This means that surveillance cannot currently be considered in HIAL's safeguarding criteria and they cannot object on this basis. The surveillance safeguarding criteria will be reinstated once the final surveillance solution has been determined, this is expected to take a period of 6 – 12 months. Above is standard response HIAL have been sending out to developers.	No further action required. An aviation assessment (Technical Appendix 15.7) will be presented in Chapter 15: Other Issues . HIAL's response and any further correspondence will be referenced in Chapter 15: Other Issues .
John Muir Trust ██████████	Email dated 10 August 2020	Noted the presence of carbon rich soils onsite. In the interests of climate would expect disturbance to these soils to be minimised through careful design and sensitive siting of the turbines, tracks and associated infrastructure.	Design evolution of the proposed Development (Chapter 2: Site Description and Design Evolution) has considered effects on peat and minimised encroachment on areas of deep peat where possible. A carbon balance assessment (Chapter 15: Other Issues) will be conducted which will estimate carbon emissions associated with construction and operation of the proposed Development and compare them with the carbon reductions that would be delivered.

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John O'Groats Trail ██████████		No response received.	No action required.
Joint Radio Company (JRC) ██████████	Emails dated 5 and 17 August 2020	JRC confirmed that all of the proposed Turbine locations had been cleared with respect to radio link infrastructure operated by the local electricity utility. JRC does not foresee any potential problems regarding interference caused by the proposed Development. If any details of the proposed Development change, particularly the location or scale of any turbines, JRC will need to re-evaluate the proposal.	Design evolution of the proposed Development (Chapter 2: Site Description and Design Evolution) has ensured that turbines have been sited to avoid impacts on JRC radio links. A telecommunications impact assessment (Appendix 15.4, Chapter 15: Other Issues) will be conducted to confirm that there are no potential effects.
Marine Scotland ██████████	Email dated 17 August 2020	<p>Provided link to generic scoping guidelines: https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren</p> <p>It is important to avoid and/or reduce the possibility of impacts from mechanisms including: increased sediment transport and deposition; pollution incidents; altered hydrological pathways; removal or degradation of fish habitat, including spawning areas; reduction in food supply and obstructions to upstream and downstream migration of fish</p> <p>Information to be included in the ES as follows:</p> <ul style="list-style-type: none"> • a description of which fish species are present and their abundance in the waterbodies and watercourses potentially impacted by the development, and whether they are important for conservation or supporting fisheries; • a description of the water quality of waterbodies which could be impacted and how the development may impact on these pre-construction conditions; • a description of what activities during construction, post-construction and decommissioning have the potential to impact on fish or associated fisheries and what mitigation measures would be put in place to avoid and/or reduce this impact; • consideration of potential cumulative effects with adjacent and other developments; and • proposals for monitoring during construction, post-construction and decommissioning. • <p>Recommended that developer carries out site characterisation surveys of water quality and fish populations within and downstream of proposed Development area (particular focus on fish populations listed under European Habitats Directive and of conservation value)</p> <p>Results from characterisations to be presented in EIA report along with appropriate mitigation measures and a monitoring programme.</p> <p>Potential cumulative impacts on water quality and fish populations as a result of operational/consented developments to also be considered in selection of control sites in proposed monitoring programmes.</p>	Baseline water quality status, water quality monitoring measures, any monitoring relating to fish population and mitigation measures will be provided in Chapter 8: Ecology and Chapter 10: Hydrology, Hydrogeology and Geology and Soils .
Ministry of Defence (MOD) ██████████	Letter response via email dated 2 September 2020	<p>MOD has no concerns about the proposed Development.</p> <p>In the interests of air safety, the MOD would request that the development should be fitted with MOD accredited aviation safety lighting. The perimeter turbines should be fitted with 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200 ms to 500 ms duration at the highest practicable point.</p> <p>MOD wishes to be consulted and notified about the progression of the proposed Development and any subsequent application(s) that may be submitted relating to it to verify that it would not adversely affect defence interests.</p>	<p>The Applicant proposes installing MOD accredited Infrared lights on selected periphery turbines of the proposed Development, agreeing this with the MOD prior to commencement of construction.</p> <p>The Applicant consulted the MOD/Defence Infrastructure Organisation following further design iteration and no issues were found. An Aviation Impact Assessment is provided in</p>

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			Technical Appendix 15.7, Chapter 15: Other Issues.
Mountaineering Scotland ██████████		No response received	No action required
NATS Safeguarding ██████████████████	Email dated 4 August 2020	The proposed Development does not conflict with safeguarding criteria so NATS Safeguarding has no objection to the proposal.	No action required
North Highland Initiative ██████████████████		No response received	No action required
North of Scotland Archaeology Society (NOSAS) ██████████████████		No response received	No action required
Nuclear Safety Directorate ██████████	Email dated 4 August 2020	ONR make no comment on the proposed Development because it does not lie within a consultation zone around a GB nuclear site.	No action required
Royal Society for the Protection of Birds (RSPB) ██████████	Letter response via email dated 18 August 2020	<p>Overall, RSPB agree with the content of the EIA Topic Information Sheet for Ornithology.</p> <p><u>Designated Sites and Birds of Conservation Concern</u></p> <p>The proposed Development is located approximately 1 km from the Caithness and Sutherland Peatlands Special Protection Area (SPA) and Ramsar site, and approximately 1.5 km from the Caithness Lochs SPA and Ramsar site. From the information available at this stage, it appears that there would be likely significant effects on the qualifying interests of both these SPAs (and corresponding Ramsar sites) from the proposed Development alone or in combination with other projects. Therefore, the EIA Report should include sufficient information to inform an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017.</p> <p>The Site and its surrounding area is used or likely to be used by a number of species listed on Schedule 1 of the Wildlife and Countryside Act and/or Annex 1 of the EU Birds Directive as well as other species that are red or amber listed Birds of Conservation Concern including hen harrier, merlin, short-eared owl, kestrel, greenshank, farmland waders (e.g. lapwing, snipe, redshank and oystercatcher), crossbill, whooper swan, Greenland white-fronted goose (GWFG), greylag goose, pink-footed goose, herring gull, greater black-backed gull and Arctic skua.</p> <p>The area is also a hotspot for curlew. British Trust for Ornithology (BTO) Atlas tetrads covering the Site and its surroundings show high densities of between 4-6, 7-9 and 10-12 breeding pairs. This shows that the whole area is extremely important for this species as these are the highest densities of curlew categories in the 5-year UK wide national survey (published in 2013). The curlew is a red-listed Bird of Conservation Concern. This, combined with the bird's global status of Near Threatened, suggests that the curlew is one of the most pressing bird conservation priorities in the UK.</p> <p>The wider landscape supports good numbers of waders. The RSPB the Caithness Wetlands and Waders Initiative, and sites in the locale are included in their Curlew Trial Management Project.</p>	Response noted. No further action is required.

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		<p>Phillips Mains Mire SSSI is sited within the application boundary. Although the Site is not designated for its ornithological interest, the blanket bog on the Site supports many bird species and the mire is used in winter by greylag geese and may also be used for foraging and as a roost by the much rarer and specially protected species, Greenland white-fronted geese (GWFG).</p>	
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Survey Methodology</u></p> <p>Generally, content with the surveys undertaken. Disappointed that a scoping exercise, which could have informed survey design, was not completed before surveys were undertaken.</p> <p>Figures 8.1 and 8.2 show that the survey boundaries and vantage point (VP) viewsheds do not cover the entire Site, but cover “the extent of the area where any potential turbines might be sited”. The RSPB understand that results from VP surveys are primarily for collision risk monitoring, but they are concerned that the survey boundaries indicated on Figure 8.1 do not cover the entire application boundary, including the access track from the road. If any tracks, borrow pits or other infrastructure is to be placed in areas not surveyed, a proper assessment of impacts will not be possible. Note that the area of the initial walkover surveys conducted in 2017 within 500 m of the application boundary and the goose and swan surveys undertaken in the winter of 2017-18 have not been presented on any figure.</p> <p>Welcome the fact that migratory flight activity has been included in the surveys. It is not clear, however, if the watch point for these surveys is the same as any of those used for the VPs. Maps should be provided showing the Migratory Flight Activity watch points. The search areas for raptors (where access permission was granted) have also not be illustrated and it is unclear what survey boundaries were used for wintering goose surveys. This information should be provided in the full EIA report.</p> <p>Disappointed that the Phillips Mains Mire SSSI is not fully included within the survey boundaries. Local bird watchers have suggested that the Mey flock of GWFG may use Phillips Mains during periods of bad weather or particularly high levels of disturbance; however, RSPB do not know how much time GWFG spends on the mire. Hope that the specific goose roost and foraging watches included this SSSI area. Including the entire SSSI for wader surveys would have also been prudent.</p> <p>It is unclear how night-migrating birds have been considered and the EIAR should address this. It is likely to be difficult to determine the significance of the effect of such a development on certain species associated with the nearby designated sites. This applies particularly to Greenland white-fronted geese which are known to commute regularly during the hours of darkness. Wildfowl often migrate at night and therefore the Vantage Point surveys undertaken to date are unlikely to have recorded them, which would result in an unreliable collision risk assessment. This should be fully explained within the EIA.</p> <p>Recommend that information is provided in the EIA report to demonstrate that the survey data is adequate, robust and accurate, including:</p> <ul style="list-style-type: none"> • full information on the VP work undertaken, including dates, times and weather conditions; • maps showing VP locations that also denote viewsheds (we note Figure 9 of the scoping report does not include these); • maps showing raptor foraging areas; • worked example(s) of collision risk calculations; and • provision of raw data in order independent verification of collision risk calculations. 	<p>The area of the initial walkover surveys and the goose and swan surveys, maps showing the Migratory Flight Activity watch points, search areas for raptors, and survey boundaries used for wintering goose surveys will be presented in Chapter 9: Ornithology of the EIA Report.</p> <p>The Phillips Mains Mire SSSI is over 500 m from the nearest turbine location, so requires less coverage in accordance with the SNH Guidance. Surveys did cover the area where at all possible, however there were restrictions due in no small part to health and safety concerns given that the area is a mire and in the main unstable for walking.</p> <p>Night-migrating birds will be addressed as necessary in EIA Report.</p> <p>Surveys were planned and carried out according to SNH guidance taking into consideration the qualifying interests of the nearby SPAs and other local bird populations.</p>
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Assessment of impacts</u></p> <p>The EIA should consider all the components of the proposal including, turbines, anemometer masts, solar panels, access roads (including the route on public roads to get the turbines on Site), on site tracks, borrow pits, drainage, grid connection, substation and temporary construction buildings/storage compounds. It should assess the impacts of all phases of the project including site selection, design, construction, operation and maintenance. Understand that decommissioning will not be considered as the application is for a development in perpetuity. The proposed condition which would deal with the</p>	<p>These effects will be assessed for the species for which assessment is required dependent on the data from surveys.</p> <p>All infrastructure elements will be included as necessary</p>

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		<p>requirement to remove turbines if they become non-operational should specify the need for a new assessment of impacts and appropriate mitigation because the baseline is likely to change over such a long period of time.</p> <p>Disturbance, displacement, loss of suitable habitat (breeding, wintering and foraging) and collision risk should be assessed for all species, both during construction and operation. This should not only include impacts from the wind turbines but also new tracks and infrastructure as well as any existing road widening or upgrades.</p> <p>The potential barrier effects of this proposal should be addressed in the EIA, for the proposed Development alone, and as part of the cumulative assessment, particularly with regards to geese, swans, gulls and divers.</p> <p>The potential impact on hen harrier behaviour of habitat change arising from the felling and future restocking of forestry or restoration in the area occupied by the turbines should be addressed in the EIA.</p>	<p>The effects of habitat alteration will be assessed as necessary.</p>
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Cumulative Impacts</u></p> <p>Cumulative impacts on the species that are sensitive to wind energy developments (via disturbance, displacement, collision risk and barrier effects) should be assessed across both the NHZ2 (North Caithness and Orkney) and NHZ5 (The Peatlands of Caithness and Sutherland) and also in relation to the nearby Caithness and Sutherland Peatlands SPA and Caithness Lochs SPA.</p> <p>The cumulative assessment should take account of all existing and proposed wind energy developments that could impact on the SPAs in question. The in-combination effect of other relevant plans or projects such as overhead power lines and new woodland planting, should also be considered.</p>	<p>Should a cumulative assessment be required this will include the effects on relevant SPAs and include other projects where necessary.</p>
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Post-construction, Mitigation, Compensation and Habitat Management Plan</u></p> <p>RSPB believes that developments should leave nature in a better condition than before they took place. Would welcome proposals that result in a biodiversity net gain on the Site or on land close to it.</p> <p>Welcome the provision of the principles for biodiversity enhancement on the Site in the EIA report; however, note that prescriptive enhancement measures would be detailed post-consent. A Habitat Management Plan (HMP) should be prepared as part of the EIA and submitted with the application, including any proposals for mitigation and enhancement in relation to important habitats and species; as well as details of post-construction monitoring for collision mortality and breeding birds, particularly those which are features of the nearby SPAs.</p> <p>RSPB would welcome early discussions on the opportunities in the area as the Site has potential for significant benefits to biodiversity through forest to bog restoration. Peatland restoration would be particularly beneficial in any areas adjacent to the Phillips Mains Mire SSSI, other open peatland habitat and adjacent fields with wader populations such as curlew, lapwing, redshank and oystercatcher.</p>	<p>A HMP will be considered, along with any mitigation or enhancement if required.</p>
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Forestry</u></p> <p>Note that the proposed Development would be within conifer forest plantation. Since much of the area is deep peat, the HMP should be designed to benefit surrounding peatland habitats by removing trees and restoring the area to open peatland habitats. Healthy peatland can act as a more effective carbon store than productive forestry, in addition to biodiversity benefits.</p> <p>Key-holing should not be considered in preference to clear felling if the environmental impacts of peat restoration would be more beneficial. The Highland Council's own guidance states "<i>While there may be scope to 'keyhole' turbines into existing woodland, this can lead to stability issues where a windfirm edge cannot be achieved and often requires higher turbines which may have additional landscape implications</i>".</p>	<p>The Applicant are exploring restoring commercial forestry to priority bog habitat in area surrounding the Phillips Mains SSSI.</p>

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		<p>Any required compensatory planting scheme should be included in the Habitat Management Plan and should be carefully planned within a suitable area with regards to habitats and species, for example, avoiding deep peat and wader hotspots. Bird surveys should be undertaken early in the planning stages to ensure birds of open habitats would not be affected.</p> <p>The Scottish Government's policy on Control of Woodland Removal states there are cases where compensatory planting is not required. This includes restoration of peat bogs where the removal of woodland would prevent the significant net release of greenhouse gases, or where it would contribute to enhancing priority species or habitats and their connectivity. Policy 52 of the Highland Wide Local Development Plan states that proposals affecting woodland will be assessed against conformity with Control of Woodland Removal. The RSPB urge the developer to consider the best outcome in terms of long-term carbon sequestration and storage, opportunities for habitat creation and potential additional benefits such as nature-based flood risk management solutions.</p>	
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p>Great-yellow bumblebee have also been recorded in the area.</p> <p>The RSPB can provide records for the Site to assist with any desk study.</p>	<p>Existing records of the great yellow bumble bee listed were provided by the RSPB (and the HBRG) and have been reviewed to inform the requirement for species-specific survey and further advice from the Bumblebee Conservation Trust in relation to the potential for impacts upon the species as a result of the proposed Development.</p> <p>In review, no species records are identified within the Site or within the immediate surrounding area, with species records largely restricted to coastal areas along the north Caithness coast and which would be unaffected by the proposed Development.</p> <p>Habitats within the Site, predominantly comprising coniferous plantation woodland, are unsuitable for the species.</p> <p>A detailed consideration of the potential for impacts upon the great yellow bumblebee, <i>bombus distinguendus</i>, will therefore not be provided within the EIA Report.</p>
<p>Royal Society for the Protection of Birds (RSPB)</p> <p>██████████</p>	<p>Letter response via email dated 18 August 2020</p>	<p><u>Peatland and Carbon Assessment</u></p> <p>The Site contains significant areas of Class 1 deep peat, according to the SNH Carbon and Peatland Map 2016. Policy 55 Peat and Soils, of the Highland Wide LDP, state that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils.</p> <p>Agree that an extensive, site-wide peat depth survey is needed in to ensure that the final infrastructure design avoids deep peat over 50 cm and any sensitive habitats. Welcome the production of a Carbon Balance Assessment. The mitigation hierarchy must be followed, with impacts avoided and minimised where possible. If there would still be impacts on peatland the carbon calculator (or other carbon assessment tool) should be used to assess the impact of the proposed Development.</p>	<p>Effects on peat will be discussed in Chapter 8: Ecology and Chapter 10: Hydrology, Hydrogeology, Geology and Soils.</p>
<p>Scottish Forestry (SF)</p> <p>██████████</p>	<p>Letter response via email dated 28 August 2020</p>	<p>The proposed Development has potential to impact on the forest environment and future management in a significant way. The Site extends 918.60 ha, majority of which is covered by conifer plantation, either restocked or established under Woodland Grant Scheme in the mid-90s. The area is covered by a Long Term Forest Plan (LTFP), ref: 17FGS18237, approved by SF on the 10 of July 2019.</p>	<p>A full baseline study will be carried out and presented in the forestry section of Chapter 15: Other Issues.</p>

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		<p>SF generally agrees with proposed methodology and scope of the forestry assessment. SF is reassured that a full site inspection will be conducted and will include gathering of data such as tree species present onsite, top height, yield class and stocking density assessment. The Site is covered by an approved LTFP so some of the data could potentially be available, subject to Landowner's agreement.</p> <p>SF requested that the following information is provided:</p> <ul style="list-style-type: none"> forestry baseline; clear distinction of felling required to accommodate proposed Development's infrastructure (ha)- permanent woodland loss; and felling required to allow for construction and operating of the proposed Development (ha) - temporary woodland loss; area of permanent woodland loss (ha) for which compensatory planting would be required, as per Scottish Government's Policy on Control of Woodland Removal (CoWRP), and a commitment on timing of producing compensatory planting plan. The compensatory planting plan might be subject to the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017; information on area and timing of felling required for the construction and operating of the proposed Development (temporary woodland loss) – the felling proposal must meet the minimum requirements for sustainable forest management, as set out in the UK Forestry Standard (UKFS) (2017). That information should be provided in a form of revised felling proposals for areas covered by LTFP, and would require separate approval from SF under the Forestry and Land Management (Scotland) Act 2018 (the Act); information on area and timing of restocking, with a commitment that the restocking is to be carried out before the proposed Development is commissioned – the restocking proposals need to meet the UKFS requirements and be approved separately by SF under the Forestry and Land Management (Scotland) Act 2018. That information should be provided in form of revised restocking proposals for area covered by LTFP; and peat depth survey results, that alongside yield class assessment will inform any peatland restoration proposals that might form part of the restocking and/or compensatory planting proposals – as per guidance on 'Deciding future management options for afforested deep peatland', available at: https://forestry.gov.scot/publications/1-deciding-future-management-options-forafforested-deep-peatland/viewdocument. <p>SF would like to point out that the new Scotland's Forestry Strategy 2019 - 2029 was published in February 2019 and should replace the Scottish Forestry Strategy (2006) that is referred to in 'Relevant Policy & Guidance' section of the Forestry Information Sheet. Scotland's Forestry Strategy is available at: https://www.gov.scot/publications/scotlands-forestrystrategy-20192029/</p> <p>All references to 'Forestry Scotland' should be changed to Scottish Forestry, as the relevant consultee.</p>	
<p>Scottish Wildlife Trust</p> <p>██████████</p>		<p>No response required.</p>	<p>No action required</p>
<p>Saving Scotland's Red Squirrels (SSRS)</p> <p>██████████</p>	<p>Email dated 31 July 2020</p>	<p>The development is taking place outside of the operation area of SSRS. SSRS can provide specific information, such as historical sightings.</p>	<p>A review of species sighting records available on the SSRS website has been undertaken to inform the scope of baseline ecology surveys (Chapter 8: Ecology).</p>
<p>Scottish Ornithologists' Club</p> <p>██████████</p>		<p>No response required.</p>	<p>No action required</p>

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Scottish Water ██████████	Email dated 3 August 2020	Scottish Water has no objection to this application. 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.	No action required
Scottish Wildcat Action ██████████	Email dated 4 August 2020	<p>Scottish Wildcat Action had no public sighting within 10 km of the Site. The absence of such a record should not be taken as absence of wildcat and Scottish Wildcat Action have no knowledge of any formal surveys that have been conducted in the area recently. There has been one plausible sighting about 23 km south of the Site. A plausible sighting is one that has not been verified with satisfactory confidence but could have been that of a wildcat.</p> <p>Given the lack of sufficient information on wildcats in the area, a camera-trap survey is recommended to check for the presence of wildcats at the Site. Guidance on camera placement is available on the Scottish Wildcats Action website: http://www.scottishwildcataction.org/media/42480/camera-trapping-leaflet-compressed.pdf</p> <p>The Scottish Wildcat Action project has come to an end. A new project, Saving Wildcats, will replace the project and the website will be updated. All records collated by the project are shared with iRecord and from there will be passed to NBN.</p>	<p>Terrestrial mammal surveys including targeted survey effort for wildcat have been undertaken with reference to NatureScot guidance (2020g) and which did not record the presence or potential presence of the species. Further consideration of the suitability of habitats within the Site for wildcat, <i>felis silvestris</i>, will be provided in Chapter 8: Ecology. The species presence is considered highly unlikely.</p> <p>In accordance with NatureScot guidance (2020g) further detailed survey using camera trapping is required only where there is a need to check evidence of a potential wildcat den. In the absence of any possible den features for the species being recorded and the unlikely presence of the species locally on the basis of absence of existing data/records, camera trapping is not considered a requirement and has not been undertaken.</p>
ScotWays ██████████	Letter response (via email) dated 8 September 2020	<p>The National Catalogue of Rights of Way (CROW) does not show any public rights of way within the application boundary or within 5 km of the Site. However, as there is no definitive record of public rights of way in Scotland, there may be routes that meet the criteria but have not been recorded.</p> <p>There may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. ScotWays acknowledge that the applicant has consulted the Core Paths Plan, prepared by the access team at The Highland Council (THC) as part of their duties under this Act.</p> <p>ScotWays welcomes the proposed improvements to the public access network and recommend consulting with the access team at THC regarding the defined line of any new routes across the Site.</p> <p>There is very little guidance regarding the siting of turbines in relation to established paths and rights of way, but the following may be helpful:</p> <p>Extract from the Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8)</p> <p>Proximity to Highways and Railways</p> <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>ScotWays are concerned there is no proposal to limit the life of the proposed Development.</p>	<p>All comments received have been factored into Chapter 14: Socio-economic, Recreation & Tourism.</p> <p>Landowners were consulted and confirmed that there are no paths on the Site that might meet criteria for public rights of way.</p> <p>Landowners consulted to establish level of recreational activity on the Site in connection to general access rights.</p> <p>The location of the nearest wind turbine to the edge of any public highway, right of way or railway line is greater than the maximum height to the blade tip.</p>
Sinclair's Bay CC		No response received	No action required.

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<p>[REDACTED]</p>			
<p>Telefonica [REDACTED]</p>	<p>Email dated 4 August 2020</p>	<p>Telefonica operate two microwave links within the Site. Based on the current turbine locations, turbine 8 would be blocking part of the Fresnel of one of the microwave links and would need to be at least further 50 meters South to not cause issues with the link. Turbines 4, 7 and 9 are fine but should not move further North. T6 is fine but should not move further South. If the coordinates change then then another assessment will be required.</p>	<p>Further consultation was held to explore potential mitigation solutions. Following a review of alternative locations and input from technical specialists it was decided to relocate Turbine 8. Telefonica have confirmed the new location will not impact on their link.</p>
<p>The British Horse Society (BHS) [REDACTED]</p>	<p>Email dated 17 September 2020</p>	<p><u>Legal context for access through windfarms in Scotland</u></p> <ul style="list-style-type: none"> The Land Reform (Scotland) Act 2003 provides a right of access for all non-motorised recreational users to most land, provided these rights are exercised responsibly. This includes windfarms (other than during the construction phase – see below). Access rights are suspended on land where building or civil engineering work is being carried out, other than on core paths or rights of way. During construction, access to live working areas may be restricted under Construction (Design and Management) Regulations 2007 on the grounds of public safety. The Scottish Outdoor Access Code clarifies that restrictions should be kept to the minimum area, and for the minimum duration, reasonably and practicably possible. Access to the remainder of the Site should not be affected, even during construction. Existing rights of way, core paths and other promoted routes should remain open even in live working areas, other than where pre-agreed signed diversions have been put in place to maintain access. <p><u>Access Controls</u></p> <p>All access controls should ensure that horse riders and carriage drivers, as well as other non-motorised users, are able to exercise their legal access rights. To ensure this, and in accordance with national guidance, BHS expects developers and planners to ensure that:</p> <ul style="list-style-type: none"> in keeping with best practice and the Equalities Act, the least restrictive option is used to provide access for all legitimate recreational users. This is usually a gap; and where it is necessary to erect or lock gates across a track to restrict illegal vehicular access, a suitable gap, bridlegate or horse stile should be maintained alongside. Guidance on appropriate widths and designs can be downloaded from the BHS Scotland website. Sites likely to be used for carriage driving should incorporate facility such as the Kent Gap design. <p>Further details and specifications for gaps, gates and other access infrastructure are provided in the Outdoor Access Design Guide https://www.pathsforall.org.uk/pfa/creating-paths/outdoor-access-design-guide.html. BHS Scotland is happy to provide further guidance and advice where required.</p> <p><u>Key issues for horses</u></p> <p>The main concerns about turbines from an equestrian perspective are:</p> <ul style="list-style-type: none"> blade movement, particularly when blades start to turn within a horse's sight line, or blades which come into view at eye level; moving shadows cast by blades, which some horses may perceive as a threat to their safety, exacerbated by the fact that the object casting the shadow may not be obvious to the horse. Blade shadows are not a problem if the turbine is north of the track or path; sun or light flicker off blades; noise from turbines, particularly erratic noise during start-up or deceleration; risk of snow and ice shedding off blades; risk of electrocution (particularly during lightning strike); and 	<p>There are no core paths, promoted routes or bridleways that traverse the Site.</p> <p>Control of the potential impacts of construction traffic associated with the proposed Development will be managed by the implementation of a CTMP. A draft CTMP will be prepared as embedded mitigation.</p> <p>Details of surfacing of proposed Development access tracks will be agreed following consent.</p>

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		<ul style="list-style-type: none"> risk of injury or fright resulting from structural failure, breakage or collapse of the tower, blades or other constituent parts of turbines. <p><u>Site assessment</u></p> <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 30 m from an equestrian route, as the cables may be difficult to see, especially by a startled horse.</p> <p><u>Design</u></p> <p>BHS expects turbine siting and renewable energy 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 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.</p> <ul style="list-style-type: none"> BHS' standard guidance is that there should be a separation distance of at least four times the overall height of turbines (i.e., to tip of blade) for core paths, nationally promoted routes such as Scotland's Great Trails and other promoted riding routes, as these are most likely to be used by equestrians unfamiliar with turbines. BHS recommends a target of three times overall height between turbines and all other routes which pre-date renewable energy development or turbine erection, including roads. BHS recommends a minimum separation distance of 200 m between turbines and core paths, rights of way or promoted riding routes. <p>Where recommended separation distances cannot be achieved, BHS will expect developers to demonstrate how safety issues can be addressed, including development and signage of alternative routes of comparable length, gradient and appeal to horse riders and carriage drivers to cater for those who prefer not to take their horses so close to turbines. From an equine perspective, turbines that suddenly come into view at close range without any warning are likely to cause the greatest risk of horses reacting.</p> <p><u>Traffic during and after development</u></p> <ul style="list-style-type: none"> Drivers of all vehicles visiting the Site should be alerted to where they are most likely to meet horses. All vehicles should be required to slow down or stop when meeting walkers, cyclists, and particularly horses. Where construction traffic crosses an equestrian route, this should be at right angles to the path or track, with warning notices for both vehicle drivers and horse riders/carriage drivers. Construction traffic should give way to recreational users. A Temporary Traffic Regulation Order should be in place before closure of any core path or promoted route which may be necessary during transportation of large components. Traffic movement which may impact on equestrian access should be planned to allow horse riders and carriage drivers to continue to ride safely in the early morning, evening, at the weekend and on bank holidays. All drivers of large vehicles should follow BHS' guidance to minimise risk to horse riders and carriage drivers (http://www.bhsscotland.org.uk/resources-for-developers.html). Where there is no alternative to using the line of a core path or promoted route as an access track during the construction phase, the route should be widened, and a fence erected to segregate vehicles from horses using the route. <p><u>Surfacing</u></p> <p>BHS recognises that from a developer's perspective, the priority is capacity to support required vehicular access, which usually involves stone surfacing, whereas the ideal surface for horses is firm, well drained turf.</p>	

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		<p>Stoned tracks may increase opportunities for year-round riding, particularly over boggy or waterlogged ground, but sharp stone, particularly if unconsolidated, can quickly lame horses, and will usually restrict pace to walk. When tracks that were previously used by equestrians are stone surfaced as part of renewable energy development this results in loss of amenity for equestrian users.</p> <ul style="list-style-type: none"> Where renewable energy 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. BHS encourages developers to identify in their proposals what, if any action, is proposed to ameliorate the surface of construction tracks on completion of construction. Where traffic movement and natural consolidation with earth or mud is insufficient to blind sharp stone, dressing with whin dust or similar material may be necessary. BHS does not expect paths or tracks with a past history of multi-use or intended for future multi-use to be surfaced with tarmac but accepts that developers may agree to bound surfacing of specific routes for the benefit of walkers and cyclists in some instances. <p>Further guidance on the general principles of equestrian access can be found at http://www.bhsscotland.org.uk/resources-for-developers.html.</p> <p><u>Other facilities</u></p> <p>Incorporation within site design of areas with space for horse boxes and trailers to park, turn and unload easily would be appreciated by horse riders and carriage drivers. Parking areas should not be close to any turbines to allow horses unfamiliar with turbines to be safely unloaded and opportunity to acclimatise. Corals, tying rails and mounting blocks are valuable additional features.</p> <p><u>Maintenance and safety tests</u></p> <p>The increased noise during over-speed and similar safety tests which involve rotors being sped up to capacity can be very frightening for horses, even those which are used to turbines. BHS urges all turbine owners and windfarm operators to alert horse riders and carriage drivers in advance of and during scheduled safety tests by erection of suitably placed signs onsite, on websites etc. confirming time and date to enable those concerned about their horses' reaction to avoid the turbines at relevant times. BHS also recommends that planners make it a condition of planning permission that those responsible for turbines are obliged to notify local horse owners of scheduled test dates at least five days in advance.</p>	
<p>Transport Scotland ██████████</p>	<p>Letter response via email dated 20 August 2020</p>	<p>SYSTRA Limited reviewed the scoping information in their capacity as Term Consultants to Transport Scotland – Roads Directorate.</p> <p><u>Proposed Development</u></p> <p>The nearest trunk road to the Site is the A9(T), which is located to the west at Thurso.</p> <p><u>Assessment of Environmental Impacts</u></p> <p>Transport Scotland agree with using thresholds indicated within the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic as a screening process for the assessment. Where significant changes in traffic are not noted for any link, no further assessment is required.</p> <p>Transport Scotland find it acceptable that base traffic flows will be obtained from 24-hour automatic traffic counts (ATCs) from the Department for Transport, Transport Scotland or The Highland Council, and will be supplemented by additional ATC surveys. Transport Scotland suggest that Traffic Scotland's National Traffic Data System is a potential source of traffic data (https://ntds.trafficscotland.org/).</p>	<p>Chapter 12: Access, Traffic and Transport will provide an assessment of road links in accordance with IEMA and Scottish Government guidance.</p> <p>A draft CTMP will be prepared to accompany Chapter 12: Access, Traffic and Transport.</p>

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		<p>Transport Scotland accept that any impacts associated with the operational phase of the development are to be scoped out of the EIA.</p> <p><u>Abnormal Loads Assessment</u></p> <p>Note that the preferred turbine component access route from a suitable port to the A836 has yet to be confirmed, but a range of potential access route options are being explored. Transport Scotland approve of including full assessment of the access route in EIAR and using approach involving identification of key pinch points along the route and assessment using swept path analysis. Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that transportation of the components would not have any detrimental effect on structures within the trunk road route path.</p> <p>Note that a Blade Lift Adapter vehicle would likely be required to transport blades through pinch points along access route. Blade Lifter Adapter vehicles have not yet been used in Scotland to any great degree, significant work will be required to satisfy Transport Scotland that the proposals can work technically, and do not represent any risk to the safe and efficient operation of the trunk road network.</p>	
<p>Vodafone ██████████</p>	<p>Email dated 13 August 2020</p>	<p>Vodafone provided a list of the links they operate closest to the Site. Vodafone require 100 m clearance from tip of any turbine blade to fixed link radio path.</p> <p>In the event of any conflict, Vodafone advise performing Fresnel Zone calculations, adhering to the recommended Ofcom methodology. This may indicate that reduced clearance margins at location point are possible. Other means of mitigation such as re-siting of masts would not be considered.</p>	<p>Design evolution of the proposed Development (as detailed in Chapter 2: Site Description and Design Evolution) has ensured that turbines have been sited to avoid impacts on Vodafone links.</p> <p>A telecommunications impact assessment (Technical Appendix 15.4, Chapter 15: Other Issues) was undertaken to identify whether the proposed Development will have any impacts on telecommunications and to propose mitigation if applicable.</p>
<p>Visit Scotland ██████████</p>		<p>No response received.</p>	<p>No action required.</p>
<p>Venture North ██████████</p>		<p>No response received.</p>	<p>No action required.</p>

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