

Lethen Wind Farm

Further Environmental Information Report

July 2022

 Fred. Olsen Renewables

 ITPENERGISED

Contents

1.	Introduction	1
2.	Response to the Application	4
3.	Landscape and Visual.....	6
4.	Ornithology.....	13
5.	Ecology	18
6.	Hydrology, Geology and Hydrogeology	24
7.	Noise and Vibration.....	27
8.	Cultural Heritage	29
9.	Traffic and Transport.....	38
10.	Socio-Economics, Tourism and Recreation.....	40
11.	Aviation and Radar	42
12.	Other Issues.....	43
13.	Summary and Conclusions	44
14.	References.....	45

Figures

Figure Number	Title
A3.1	Cumulative ZTV to 45km with Operational Tom nan Clach and In Planning Tom na Clach Wind Farm Extension
A6.1	Interpolated Soil and Peat Depth
A6.39	Viewpoint 3
A6.40	Viewpoint 4
A6.41	Viewpoint 5
A6.42	Viewpoint 6
A6.43	Viewpoint 7
A6.44	Viewpoint 8
A6.45	Viewpoint 9
A6.46	Viewpoint 10
A6.47	Viewpoint 11
A6.48	Viewpoint 12
A6.49	Viewpoint 13
A6.50	Viewpoint 14

A6.52 Viewpoint 16

Appendices

Appendix Number	Title
A6.1	Response to Stage 1 Checking Report
A6.2	Peat Slide Risk Assessment
A9.1	The Highland Council Planning Condition Review (Transport)

List of Abbreviations

Abbreviation	Description
CNP	Cairngorms National Park
CNPA	Cairngorms National Park Authority
CRM	Collision Risk Modelling
CTMP	Construction Traffic Management Plan
CZTV	Cumulative Zone of Theoretical Visibility
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
FEI	Further Environmental Information
HES	Historic Environment Scotland
HLC	Habitat Loss Calculations
HMP	Habitat Management Plan
HRA	Habitat Regulations Assessment
LCT	Landscape Character Type
LVIA	Landscape and Visual Impact Assessment
NHZ	Natural Heritage Zone
NSR	Noise Sensitive Receptor
OHMP	Outline Habitat Management Plan
RSPB	Royal Society for the Protection of Birds
SEPA	Scottish Environment Protection Agency
SLQ	Special Landscape Quality
SNH	Scottish Natural Heritage (now known as NatureScot)
SPA	Special Protection Area
SPP	Scottish Planning Policy
THCHET	The Highland Council Historic Environment Team
THC	The Highland Council
TnC	Tom Nan Clach Wind Farm

TnCExt	Tom na Clach Wind Farm Extension
VP	Viewpoint
ZTV	Zone of Theoretical Visibility

1. Introduction

1.1. Background

- 1.1.1 Fred. Olsen Renewables Ltd (hereafter referred to as ‘the Applicant’) has applied to the Scottish Ministers for Section 36 consent and deemed planning permission under the terms of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, to construct and operate Lethen Wind Farm (hereafter referred to as the ‘Proposed Development’, at site centre British National Grid (BNG) NS 9322 3567.
- 1.1.2 The application was supported by an Environmental Impact Assessment Report (EIA Report) as required by The Electricity Works (Environmental Impacts Assessment) (Scotland) Regulations 2017 and submitted to the Scottish Ministers in December 2021 with the application (Reference: ECU00002216).

1.2. Purpose of the Further Environmental Information (FEI)

- 1.2.1 Following the submission of the Proposed Development, the Energy Consents Unit (ECU) consulted relevant statutory and non-statutory organisations as well as the public. Following the receipt of consultation responses, the Applicant has undertaken further work where appropriate and produced this Further Environmental Information (FEI) Report.
- 1.2.2 This FEI Report provides the information required to address changes to the cumulative baseline, notably the Tom na Clach Wind Farm Extension (TnCExt) (ECU00003453), and address comments received in response to the application. The TnCExt scheme was shown as ‘in Scoping’ within **Figures 6.26** and **6.27** of the **EIA Report** and is located approximately 4.28 km (turbine to turbine) to the west of the Proposed Development. The TnCExt scheme is a proposed extension to the operational Tom nan Clach Wind Farm (TnC) and was submitted to the Scottish Ministers in March 2022.
- 1.2.3 It should be noted that there are no changes to the Proposed Development as outlined within the application.
- 1.2.4 The information set out below is intended to be read in conjunction with the EIA Report and the assessment procedure used in this report follows that of the EIA Report. Reference will be made to the EIA Report chapter, associated technical appendices and figures where the original remains applicable. Where any information in the EIA Report is superseded by the information presented in this FEI Report, this is made clear.

1.3. FEI Project Team

- 1.3.1 The FEI Report was produced by ITPENERGISED’s environmental teams supported by external consultants. **Table 1.1** outlines the full team, their role and experience.

Table 1.1 – FEI Team

Person	Role (Company)	Expertise
Anna Hudson	EIA Project Manager (ITPENERGISED)	BSc (Hons) Biology/Zoology, MSc Environmental Sustainability, PIEMA. 12 years’ of experience in the EIA project management.
Fraser Blackwood	Planning Policy Context (JLL)	BA (Hons) Geography and Environmental Planning, MSc Urban Real Estate Management, MRTPI.

Person	Role (Company)	Expertise
		17 years' of experience in planning and environmental consultancy.
Brian Denny	Landscape and Visual and Residential Visual Amenity (Pegasus Group)	BA (Hons) Landscape Architecture, PG Diploma Landscape Architecture, MIEMA, C.Env, Chartered Landscape Architect, Fellow of the Landscape Institute. Experienced expert witness. Over 30 years' experience in design and development.
Shona Ruesch	Ornithology (Natural Power)	MSc Ecology and Evolution 12 years' experience in conservation, academic and consultancy sectors.
Nicole Dunn	Ecology (Natural Power)	BSc (Hons) Biology and Chemistry, MSc Environmental Monitoring, Modelling and Management, Associate member of CIEEM. 12 years' experience in conservation, academic and consultancy sectors.
Katherine Arthur	Geology, Peat, Hydrology & Hydrogeology	MA (Hons) Geography, MSc Energy and Environmental Management 15 years' of experience in hydrology and peat assessments for renewable energy projects
Simon Waddell	Noise and Vibration (ITP Energised)	BSc, MIOA. 11 years' experience
Lynne Roy	Cultural Heritage (AOC Archaeology Group)	BA (Hons), MSc, FSA SCOT, MCIfA. Experienced expert witness. 18 years' experience.
Gordon Buchan	Traffic and Transport (Pell Frischmann)	BEng (Hons), MSc, MCILT, MCiHT. Experienced expert witness. 25 years' experience.
Graeme Blackett	Socio-Economics, Tourism and Recreation	BA (Hons) Economics, MIED, Member of the Economic Development Association Scotland. Experienced expert witness. 26 years' experience.
Ian Fletcher	Aviation and Radar (Wind Business Support)	BEng (Hons) Mechanical Engineering 19 years' experience

1.4. Availability of the FEI

- 1.4.1 In accordance with the Electricity Works (Miscellaneous Temporary Modification) (Coronavirus) (Scotland) Regulation 2020, electronic copies of the FEI Report and supporting documents can be accessed at <http://www.energyconsents/scot/> and www.fredolsenrenewables.com/windfarms/lethen/

1.4.3 Hard copies of the FEI Report are available by request from:

Fred. Olsen Renewables
Ochil House
Springkerse Business Park
Stirling
FK7 7XE
Email: communities@fredolsen.co.uk

1.5. Representation to the FEI

1.5.1 Any representations to the submission of the FEI Report should be made directly to the Scottish Government at

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

Email: representations@gov.scot

Online: <http://www.energyconsents.scot/>

2. Response to the Application

2.1.1 The responses received to date on the submission of the application from consultees are summarised in Table 2.1 below and are provided in greater detail, along with the Applicant's response, within the respective technical chapters.

Table 2.1 – Summary of Responses

Consultee	Consultation Response
British Horse Society	No objection
BT	No objection
Cairngorms National Park Authority (CNPA)	Objection
Carrbridge & Vicinity Community Council	Neutral
Cawdor and West Nairnshire Community Council	No objection
Cromdale and Avie Community Council	Support
Crown Estate	No objection
East Nairnshire Community Council	<i>Gone into Abeyance</i>
Finderne Community Council	Objection
Findhorn Nairn and Lossie Rivers Trust	No objection
Grantown On Spey Community Council	Objection
Highland and Islands Airports	No objection
Historic Environment Scotland	Objection
Joint Radio Company	No objection
Marine Scotland	No objection
Ministry of Defence (MoD)	No objection
NatureScot	No objection
NATS Safeguarding	No objection
Royal Society for the Protection of Birds (RSPB)	No objection
Scottish Environment Protection Agency (SEPA)	No objection
Scottish Water	No objection
The Highland Council (individual officers only)	Objection (landscape & heritage)
Transport Scotland	No objection

2.1.2 Table 2.2 overleaf notes those consultees that were notified of the application but have not responded.

Table 2.2 – Consultees that have not provided a response

Consultee	
Civil Aviation Authority	Scottish Forestry
Dulnain Bridge Community Council	Scottish Rights of Way and Access Society (ScotWays)

Consultee

Fisheries Management Scotland	Scottish Wildlife Trust
John Muir Trust	Scottish Wild Land Group (SWLG)
Moray Council	Strathdearn Community Council
Mountaineering Scotland	Visit Scotland

- 2.1.3 There have been a total of 59 public representations made to the Proposed Development application (as of 06 July 2022): 27 have been in support of the Proposed Development and 32 representations have objected.

3. Landscape and Visual

3.1. Introduction

3.1.1 This section of the FEI Report considers landscape and visual matters. In particular it serves to provide an update to the existing cumulative landscape and visual assessment, presented in **Section 6.10 of Chapter 6 of the EIA Report**. The update addresses the TnCExt as an additional scheme under scenario 2 of the cumulative assessment (which addresses ‘in-planning’ schemes).

3.2. Consultee Feedback and Applicant Response

3.2.1 Responses on landscape and visual matters were received from NatureScot, THC and Cairngorms National Park Authority (CNPA) and are summarised in **Table 3.1** below along with the Applicant’s response.

Table 3.1 – Matters Raised in Relation to Landscape and Visual

Comment	Applicant’s Response
NatureScot –29 April 2022	
<p>We did not consider the Applicants’ assessment of effects on the Special Landscape Qualities (SLQs) of the Cairngorms National Park (CNP) sufficient to draw conclusions from. We have therefore undertaken further work to better inform our own appraisal of effects. Our own assessment concludes that there would be a significant effect on three SLQs of the National Park, namely;</p> <ul style="list-style-type: none"> - <i>Dark skies</i> SLQ within close proximity of the proposal around the rim of the CNP as a result of the turbine lighting, - <i>Wildness</i> SLQ within close proximity along the margins of the CNP as a result of the turbine lighting, and - <i>Landscapes both cultural and natural</i> SLQ from the Cromdale Hills as a result of the proposal blurring the distinction between these two key underpinning characteristics. <p>The significant effects on the SLQs identified as a result of the lighting (<i>Dark Skies</i> and <i>Wildness</i> SLQs) are limited in extent, affecting outward facing views to less visited areas of the CNP which lie along its boundary. The significant effects on the <i>Landscapes both cultural and natural</i> SLQ however are well within the interior of the CNP (at around 18 km from the proposal) across popular and well visited areas of the CNP. It is our view that the collective significance of the effects on the SLQs of the National Park are not of a degree that they damage the unity or soundness of the CNP and therefore they would not affect its integrity.</p>	<p>The EIA Report included an ‘<i>Assessment of effects on the Special Landscape Qualities of the Cairngorms National Park</i>’ at its Appendix 6.6. This was undertaken following the approach set out within the draft methodology ‘<i>Guidance for Assessing the Effects on Special Landscape Qualities</i>’ (2018) prepared by NatureScot.</p> <p>The proposed approach to the assessment was shared with NatureScot via email dated 17 September 2021 and no concerns were raised regarding the proposed approach. It is therefore disappointing that NatureScot did not consider the assessment was sufficient to draw conclusions from. However, notwithstanding this, it is noted that NatureScot concluded that “<i>the effects on the SLQs of the National Park are not of a degree that they damage the unity or soundness of the National Park and therefore they would not affect its integrity</i>” and this conclusion replicates the overall findings of Appendix 6.6 of the EIA Report.</p>

Comment	Applicant's Response
<p><u>Effects on Landscape Character</u></p> <p>We agree with the LVIA that there would be significant effects on parts of Landscape Character Type (LCT) 291 Open Rolling Upland and LCT 286 Narrow Wooded Valley – Moray and Nairn</p>	<p>It is noted that NatureScot agree with the LVIA that the only significant effects on landscape character would be on parts of LCT 291 Open Rolling Upland and LCT 286 Narrow Wooded Valley – Moray and Nairn.</p>
<p><u>Effects on visual amenity</u></p> <p>We are in general agreement with many of the conclusions of the visual impact assessment however we continue to be of the view that the conclusions on the effect of the lighting would have been better informed if the applicants had drawn on a visualisation to illustrate the degree of existing lighting arising from nearby settlements and roads.</p>	<p>It is noted that NatureScot set out that they are in general agreement with the LVIA in relation to effects on visual amenity and that they do not identify any additional significant effects on visual receptors beyond those set out in the LVIA.</p> <p>Regarding the potential for an additional night-time visualisation from within the CNP, correspondence was held with NatureScot regarding this matter during the preparation of the LVIA. This highlighted the very limited extent of night-time visibility from within the National Park, in particular from areas which were not remote and likely to be experienced by more than a very small number of receptors. Attention was also drawn to the findings of the Report to the Scottish Ministers in relation to the Crystal Rig IV Wind Farm including the following observations following the Reporters viewing of a test light '<u>Beyond 7.5 kilometres, for example, when weather conditions are good, the intensity of the light would be significantly reduced and appear no brighter than the brightest stars in the sky. As we note above, we found it difficult to detect the test light at 200 candela when viewed from Whitekirk [i.e. at a distance of 17 km] and, as such, do not consider that the lights would be particularly noticeable'</u></p>
<p>Highland Council – 25 May 2022</p> <p>Highland Council are yet to provide their formal Landscape comments, but provided advice in an email dated 25 May 2022 regarding the proposed scope of the landscape and visual section of the FEI Report.</p>	<p>The feedback on the scope of the FEI has been taken into account and has informed the content of the FEI Report. This includes: Updated Visualisations (prepared to both Highland Council and NatureScot visualisations standards) which also show Tom na Clach Wind Farm Extension in the cumulative wireline images for a selection of the LVIA Viewpoints; the collection of updated photography for viewpoints 10- Beinn Mhor and 16- Summit of the Knock of Braemoray; and site infrastructure to be modelled into the updated visualisations.</p>
<p>Cairngorms National Park –22 April 2022</p> <p>The committee resolved to object to the Proposed Development, due to significant adverse effects on three of the Special Landscape Qualities of the CNP (as set out in</p>	<p>The objection of the CNPA is noted.</p> <p>The matter of the effects on the CNP was addressed within Appendix 6.6 of the</p>

Comment	Applicant's Response
the Committee Report) causing it to fail to meet the requirements of Policies 1.3 and 3.3a of the <i>Cairngorms National Park Partnership Plan 2017 – 2022</i>	EIA Report the 'Assessment of effects on the Special Landscape Qualities of the Cairngorms National Park'. It is also noted that in their consultation response, NatureScot conclude that <i>'It is our view that the collective significance of the effects on the SLQs of the National Park are not of a degree that they damage the unity or soundness of the National Park and therefore they would not affect its integrity'</i>

3.3. Updated Cumulative Assessment

- 3.3.1 The section includes for consideration of Cumulative Effects on both Landscape Character and Visual Amenity, with consideration to both 'in combination' and 'sequential' visual effects. Consideration is also given to the overall totality of the Combined Effect of all schemes with TnCExt now included.
- 3.3.2 The text is supported by a Cumulative ZTV (CZTV) for Lethen with Tom Nan Clach Wind Farm (TnC) and TnCExt (Figure A3.1). Updated Visualisations (prepared to both THC and NatureScot visualisations standards) which also show TnCExt in the cumulative wireline images have also been prepared for the following selection of the LVIA Viewpoints: VP3, VP4, VP5, VP6, VP7, VP8, VP9, VP10, VP11, VP12, VP14 and VP16.
- 3.3.3 In undertaking these visualisations all existing turbines have been re-rendered to face the viewer as requested by THC. All site infrastructure has also been modelled into the updated visualisations where this would be visible and not screened by the intervening landform. The visualisations for Viewpoints 10: Beinn Mhor and 16: Summit of the Knock of Braemoray now also include different baseline photography taken in clearer weather conditions than those included within the EIA Report.

Updated Cumulative Effects

- 3.3.4 All other wind energy developments that were operational, under construction, consented or subject to a valid full planning or Section 36 application within 45 km of the Proposed Development were identified and reviewed as part of the cumulative baseline set out in the EIA Report. It was acknowledged that this list is constantly evolving and therefore, 12 October 2021 was used as an effective 'cut off' date after which no further research was undertaken on the evolving status of wind energy development in the study area, and the Cumulative LVIA reflected the status of each wind farm at the time of this date.
- 3.3.5 The TnCExt was submitted to the Scottish Ministers on 28 March 2022. **Table 3.2** below summarises the details of the scheme, updating the information presented in **Table 6.11** of the **EIA Report**.

Table 3.2 - Other Wind Farms within 45 km of the Site - Updated

Site	Blade tip height of turbines	Number of turbines	Distance and Direction
In Planning			
Tom na Clach Wind Farm Extension	149.9m	7	4.28 km west

- 3.3.6 **Table 6.12** of the **EIA Report** provided a summary of cumulative visibility at each of the 16 assessment viewpoints. **Table 3.3** below summarises the visibility of the TnCExt as an update to **Table 6.12**.

Table 3.3 - Summary of Combined Cumulative Visual Effects by Viewpoint Location – Updated

Visibility of Wind Farms at Each Viewpoint Location (Key: X = In Combination, O = In Succession)	
Viewpoint location	Tom Na Clach Extension
1 Carn Glas-choire	O
2 Minor road north of Drynachan	O
3 B9007 near Lochindorb	X
4 Creag Ealraich	X
5 Meall a’Bhreachraibh	X
6 Shore Road, Lochindorb	X
7 Dava Way	X
8 A939 at Milestone	X
9 Gorton Hill	X
10 Bheinn Mhor	X
11 Creagan a Chaise	X
12 Meall a’Bhuachaille Cairn	X
13 Minor Road, near Dunearn Fort	O
14 Ardclach Bell Tower	X
15 Lymore on the A939	X
16 Summit of the Knock of Braemoray	X

3.3.7 Scenario 2 of the cumulative assessment in the EIA Report addressed ‘in-planning’ schemes. The following section provides an update to this assessment now including for TnCEXt.

[Cumulative Effects on Landscape Character](#)

Cumulative Scenario 2 – Other consented and in-planning schemes are considered to also be operational

3.3.8 In the second cumulative scenario (where other schemes in planning are also considered to be consented and operational), the EIA Report considered five additional schemes, which were comprised of three broad groupings. Firstly, the revised Cairn Duhie scheme which lies c.6 km to the north-east. Secondly, the Clash Gour, Berry Burn Extension and Rothes III schemes, which lie between 13 km and 27 km to the north-east. Thirdly, the Corriegarth II scheme which lies c.3.7 km to the south-west.

3.3.9 The TnCEXt would lie away from these schemes at a distance of around 4.28 km to the west, but in the same tract of landscape as the existing TnC Wind Farm, which it would serve to extend.

3.3.10 As the TnCEXt would be located adjacent to an existing wind farm it would therefore serve to further consolidate the existing influence of wind energy which is already brought about in this part of the landscape. It is noted that the existing TnC Wind Farm and the proposed TnCEXt

both lie with the same Landscape Character Type (LCT) (291 – Open Rolling Upland) as the Proposed Development.

- 3.3.11 However, given the TnCExt is located immediately adjacent to the existing TnC Wind Farm, it is therefore considered that if this scheme were also part of the baseline landscape in which the Proposed Development were to be constructed, there would be no substantive change to the previous assessment of the effects on landscape character which the Proposed Development would bring about. The combined effects of all the schemes together are subsequently discussed separately below.

Totality of the Combined Effect of all Schemes

- 3.3.12 Consideration was also given in the EIA Report to the overall totality of the effect, when the Proposed Development was considered alongside the other operational, consented and proposed schemes. Of most relevance to this was a consideration of the overall impact on the two LCTs where a significant effect was identified in the main assessment, and which cover the majority of the 5 km area around the Proposed Development: LCT 291 – Open Rolling Upland and Flows and LCT286 – Narrow Wooded Valley. This assessment is now extended to also include consideration of the TnCExt.
- 3.3.13 The Proposed Development is located in LCT 291 – Open Rolling Upland. The existing TnC Wind Farm is already operational in the western part of the LCT, with the Paul's Hill I and Berry Burn schemes already located in the north-eastern part of the LCT. The TnCExt would lie alongside the existing TnC Wind Farm in the western part of the LCT.
- 3.3.14 It is acknowledged that each of the operational schemes already individually bring about a localised significant effect on the part of LCT291 in which they are located. The TnCExt would therefore serve to extend the localised significant effect which is already brought about by the existing TnC Wind Farm to a minor degree. In turn, it is noted that the revised Cairn Duhie Wind Farm and part of the Clash Gour scheme and the Berry Burn Extension are also proposed within LCT291 and would themselves also give rise to a localised significant effect on those parts the LCT in which they are located.
- 3.3.15 It is acknowledged that there may also be the potential for further additional combined effects to occur in those parts of the LCT291 which lie between two or more of the sites, but where the schemes individually would not bring about a significant effect. In this case however, it is already identified in the main assessment that the significant effects of the Proposed Development in its own right would extend up to the location of the TnC and Cairn Duhie schemes. As such, there would not be any additional significant cumulative effect in additional parts of the landscape located between the schemes that would not already arise as a result of the Proposed Development in its own right if you were to also include the TnCExt, as it lies within this same area.
- 3.3.16 It is recognised that the combined overall effect on the character of LCT291 were the Proposed Development plus each of the additionally proposed schemes to be consented alongside the existing TnC scheme would be notable, such that collectively the character area would become one in which the presence of wind farms was a recognised characteristic. It would not however be the case that wind energy would become the single dominant characteristic of LCT291 in such a fashion that would prevent an understanding and appreciation of its wider underlying landscape. This conclusion would not change with the inclusion of the TnCExt, given its location immediately adjacent to the existing TnC Wind Farm.
- 3.3.17 LCT286 – Narrow Wooded Valley is located to the north of the Proposed Development and does not have any existing or proposed wind farms located within it. A significant effect was identified for part of the LCT as result of the Proposed Development and as a result of its proximity to LCT286 it is understood that such localised significant effects with the LCT would also apply to the revised Cairn Duhie Wind Farm which lies immediately adjacent to the LCT.

There may also be the potential for views of the existing schemes at Hill of Glaschyle and Berry Burn, as well as the proposed Clash Gour and Berry Burn Extension. The TnCExt, given its location relatively close to LCT286, may also have visibility from the LCT further consolidating the effect on the area.

- 3.3.18 When the combined effect of both Lethen, Cairn Duhie, TnCExt and the other schemes is considered it is noted that a significant effect would extend to cover much of the southern part of the LCT. However, it is not considered that views of wind energy beyond the boundary of the LCT would become the single dominant characteristic of LCT286 in such a fashion that would prevent an understanding and appreciation of its wider underlying characteristics.

Cumulative Effects on Views and Visual Amenity

Cumulative Scenario 2 – Other consented and in-planning schemes are also considered to be operational

- 3.3.19 As with cumulative landscape character effects, it is acknowledged that wherever more than one wind farm is visible in any given view, there will be a greater overall or cumulative effect on the view or visual amenity than if just one wind farm was visible in the landscape and that the more wind turbines that are constructed, the greater the magnitude of overall (or combined) change to the view or visual amenity that prevailed prior to the introduction of the first turbines.
- 3.3.20 However, it is also noted that in any given view where turbines are already present, the additional effect on visual amenity of introducing further turbines may not be as significant as the initial introduction of turbines. This is relevant when considering the addition of the TnCExt immediately adjacent to the existing TnC Wind Farm.
- 3.3.21 It is also recognised however that a slight additional effect on top of an existing effect which at present is not quite significant could in theory tip the balance such that the overall effect is deemed to be significant. Again, generally speaking, such additional cumulative effects will arise where a visual receptor would now lie between a cumulative wind farm in one direction and the Proposed Development in a different direction, such that the visibility of turbines as a result of the addition of the Proposed Development would become notable in multiple, usually directly opposite, directions. However, it is noted that this may also apply where a view of the current 13 turbines in the existing TnC Wind Farm, becomes a view of up to 20 turbines once the TnCExt is also considered in the same direction.

Cumulative 'in combination' visual effects

- 3.3.22 An 'In combination' cumulative visual effect is the term used to refer to the situation where a viewer is able to see one or more further wind farms, in addition to the Proposed Development, whilst standing in the one location. These effects are either 'simultaneous', where the viewer can see the additional turbines in the same angle of view, or 'successive', where the view can see the additional turbines in a different angle of view by turning their head.
- 3.3.23 As was set out within the main part of the assessment in the EIA Report, many of the views available towards the Proposed Development will already include the existing TnC turbines either simultaneously, or successively. For the most part therefore, any views of the TnCExt will be from locations which already have visibility of the existing TnC turbines.
- 3.3.24 With regard to the revised visualisations which have been prepared to also include the TnCExt in the cumulative wirelines it is considered that if this scheme were also part of the baseline landscape in which the Proposed Development were to be constructed, there would be no change to the previous assessment of the effects on visual amenity which the Proposed Development would bring about, as set out in the EIA Report. TnCExt would form a minor additional element in the view, seen in the same tract of landscape as the existing TnC turbines.

Cumulative 'sequential' effects

- 3.3.25 A 'sequential' cumulative visual effect is the term used to refer to the situation where a viewer is able to see one or more further wind farms in addition to the Proposed Development, whilst travelling along a linear route. This could be either on foot, whilst walking on a footpath, or by bicycle or car along the public highway. The main assessment in the EIA Report focussed on the following routes which it was identified had the potential to experience significant effects as a result of the Proposed Development and these were also used as the basis for the cumulative assessment:
- A939
 - A940
 - B9007
 - Shore Road Lochindorb
 - Dava Way
- 3.3.26 Each of these receptors has been considered in relation to the TnCExt and it is not considered that any additional significant cumulative effects would arise, beyond the significant effects on these routes which were already identified in the main assessment in the EIA Report. It is acknowledged that the TnCExt would be visible from these receptors to some degree but given its location immediately adjacent to the existing TnC turbines and relative distance away from these locations, it is not considered that this would change the previous conclusions, also noting the scheme would lie further from these routes than the Proposed Development.

Totality of the Combined Effect of all schemes

- 3.3.27 Consideration has also been given the overall totality of the cumulative visual effect, when the Proposed Development is considered alongside the other operational, consented and proposed schemes, now including for the TnCExt. As previously set out in the EIA Report, the main visual receptors where this would be applicable are the A939, A940, B9007, the Shore Road Lochindorb and the Dava Way.
- 3.3.28 It has already been identified in the main assessment that there would be a significant visual effect on part of the B9007 and the Shore Road Lochindorb as a result of the Proposed Development. When the combined effects of the other operational, consented and proposed schemes are considered, now including for the TnCExt there would also be localised significant effects on parts of the A939, A940 and the Dava Way. However, these effects would be brought about by the other schemes in isolation, irrespective of the addition of the Proposed Development or the TnCExt. It is not considered that the addition of the Proposed Development would be such as to result in the overall cumulative impact of turbines being dominant or oppressive in views from this area. This would remain the case with the inclusion of the TnCExt.

3.4. Summary

- 3.4.1 This FEI chapter updates the **Chapter 6** landscape and visual assessment within the **EIA Report**, when taking into consideration the responses/updated cumulative etc. This update has not altered the overall conclusions of the EIA Report.

4. Ornithology

4.1. Introduction

- 4.1.1 This section provides an updated assessment of potential impacts on ornithological receptors relevant to the Proposed Development to allow the inclusion of the nearby TnCExt, for which an application has now been submitted. For all other information refer to **Chapter 7** of the **EIA Report**.

4.2. Consultee Feedback and Applicant Response

- 4.2.1 Responses on Ornithology matters were received from NatureScot and the Royal Society for the Protection of Birds (RSPB) and are summarised in **Table 4.1** below along with the Applicant's response.

Table 4.1 - Summary of Consultee Feedback and Applicant Response

Comment	Applicant's Response
NatureScot – 29 April 2022	
Conclude that the proposal will not adversely affect the integrity of the capercaillie Special Protection Areas (SPAs).	Noted. No response required.
Welcome the Applicant's proposal to provide a Species Protection Plan for breeding birds. Recommend this includes measures to safeguard breeding birds during all works proposed, including any activities relating to the proposed Habitat Management Plan, and also includes appropriate survey buffers around the site access routes as well as any proposed borrow pits.	Proposed conditions noted and agreed by the Applicant.
Advise that plans to reduce the intensity and/or extent of heather management through burning and/or cutting (as outlined in the Outline Habitat Management Plan (OHMP)) also have the potential to increase the risk of damaging wildfire. We therefore advise that identifying wildfire prevention measures and developing a Wildfire Response Plan alongside the Habitat Management Plan would be appropriate.	Proposed conditions noted and agreed by the Applicant.
RSPB –18 February 2022	
Are content with the findings of the information to inform the Habitat Regulations Assessment (HRA) (EIA Report Appendix 7.3) that identifies that there is a low risk of impacts on Capercaillie Special Protection Areas as a result of the proposed wind farm.	Noted. No response required.

4.3. Updated Cumulative Assessment

- 4.3.1 The cumulative impact assessment has been updated to include the nearby TnCExt, for which an application was submitted at in March 2022. See **Table 4.2** below.

4.4. Summary

- 4.4.1 This FEI chapter updates the cumulative impact assessment within the EIA Report, when taking into consideration TnCExt. No further updates were required as a result of consultee responses. This update has not altered the overall conclusions of the EIA Report, which is no significant residual effects on any ornithological features.

Table 4.2 - Summary of Cumulative Ornithological Effects

IOF	EIA Cumulative Residual Effects	TnCExt	Total Cumulative Residual Effects
<p>Greylag goose</p>	<p>Collision Risk Modelling (CRM) was undertaken for two sites in addition to the Proposed Development giving an estimate of 1.72 collisions per year across all sites (0.77 in the breeding season, 0.79 in the non-breeding season). Breeding season collision mortality from these sites represents 0.002 % of the Scottish breeding population. Non-breeding season collision mortality represents an undetectable number of the Scottish wintering population. Cumulative predicted collision rate would be undetectable against background annual mortality.</p> <p>Cumulative collision risk is predicted to be of negligible magnitude at the regional level, resulting in no significant effect.</p>	<p>Greylag goose was scoped out of assessment and CRM for this species is not included in the CRM report (Appendix 12.C).</p>	<p>As no collision impact was predicted for greylag goose at TnCExt there is no additional cumulative impact predicted.</p> <p>Therefore, the cumulative collision risk is still predicted to be of a negligible magnitude at the regional level, resulting in no significant effect.</p>
<p>Pink-footed goose</p>	<p>CRM was undertaken for two sites in addition to the Proposed Development, giving an estimated 2.38 collisions per year across all sites (which would represent <0.01 % of the Scottish and UK populations). Cumulative predicted collision rate would be undetectable against background annual mortality.</p> <p>Cumulative collision risk is predicted to be of negligible magnitude at the regional level, resulting in no significant effect.</p>	<p>Pink-footed goose was scoped out of assessment and CRM for this species is not included in the CRM report (Appendix 12.C).</p>	<p>As no collision impact was predicted for pink-footed goose at TnCExt there is no additional cumulative impact predicted.</p> <p>Therefore, the cumulative collision risk is still predicted to be of a negligible magnitude at the regional level, resulting in no significant effect.</p>
<p>Whooper swan</p>	<p>There were few whooper swan records from other sites; CRM was only undertaken for the Proposed Development. This gave an estimate of 0.36 collisions per year (which would represent <0.2 % of the total population estimates for NHZs 12 and 16 and of the most recent British wintering population estimate). Cumulative predicted collision rate would be undetectable against annual mortality.</p> <p>Cumulative collision risk is predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p>	<p>Whooper swan was scoped out of assessment and CRM for this species is not included in the CRM report (Appendix 12.C).</p>	<p>As no collision impact was predicted for whooper swan at TnCExt there is no additional cumulative impact predicted.</p> <p>Therefore, the cumulative collision risk is still predicted to be of a low magnitude at the regional level, resulting in no significant effect.</p>
<p>Golden eagle</p>	<p>CRM was undertaken for one site in addition to the Proposed Development giving an estimate of 0.04 collisions per year across the two sites. This represents 0.2 % of the breeding population estimate for NHZ 10. The cumulative predicted collision rate of these two sites is unlikely to be detectable against background mortality.</p>	<p>0.012 birds predicted to collide per year.</p> <p>Recorded nest location adjacent to site boundary but construction and operational disturbance</p>	<p>The cumulative CRM total for all developments is 0.052 birds per year. This represents 0.2 % of the breeding population estimate for NHZ 10. This is not substantially changed compared with that predicted in the EIA. Therefore, the</p>

IOF	EIA Cumulative Residual Effects	TnCExt	Total Cumulative Residual Effects
	<p>Cumulative collision risk is predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p>	<p>/displacement effects predicted to be negligible.</p>	<p>cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p>
<p>Hen harrier</p>	<p>The one hen harrier territory found at the site is the only nest included in the cumulative assessment (although a second pair also attempted to breed in the Proposed Development Area in 2018). This represents 5.6 % of the NHZ 10 population estimate of 18 pairs. However, there is extensive nesting and foraging habitat in the area surrounding the three developments and hen harriers have been shown to nest successfully in close proximity to wind turbines. It is therefore unlikely that both nesting pairs will be permanently displaced by these wind developments. Furthermore, habitat management at the Proposed Development will provide areas of deep heather away from turbines in which hen harriers could nest.</p> <p>It is therefore predicted that cumulative disturbance/ displacement effects will be of low adverse magnitude and not significant.</p> <p>CRM was undertaken for one site in addition to the Proposed Development giving an estimate of 0.04 collisions per year across the two sites. This represents 0.1 % of the breeding population estimate for NHZ 10.</p> <p>Therefore, cumulative collision risk is predicted to be of low adverse magnitude at the regional level, resulting in no significant effect.</p>	<p>0.006 birds predicted to collide per year.</p> <p>Recorded nest location within 2 km of Proposed Development but construction and operational disturbance/displacement effects predicted to be negligible.</p>	<p>The cumulative CRM total for all developments is 0.046 birds per year. This represents 0.13 % of the breeding population estimate for NHZ 10. This is not substantially changed compared with that predicted in the EIA. Therefore, the cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p> <p>As there is no predicted impact to additional breeding territories there is no change in the cumulative disturbance/ displacement effects. Therefore, these effects are predicted to be of low adverse magnitude and not significant.</p>
<p>Merlin</p>	<p>One merlin territory was recorded in the survey areas of the listed developments. Together with the single pair of breeding merlin within the Proposed Development this represents 15.4 % of the NHZ 10 population estimate of 13 pairs. However, there is extensive nesting and foraging habitat in the area surrounding the three developments. It is therefore unlikely that the pair will be permanently displaced by the Proposed Development. Furthermore, habitat management at the Proposed Development will provide areas of deep heather away from turbines in which merlin could nest.</p>	<p>No merlin territories were recorded within 2 km of the site.</p> <p>Merlin was scoped out of assessment and CRM for this species is not included in the CRM report (Appendix 12.C).</p>	<p>As no collision impact or disturbance/ displacement was predicted for merlin at TnCExt there is no additional cumulative impact predicted.</p> <p>Therefore, the cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p>

IOF	EIA Cumulative Residual Effects	TnCExt	Total Cumulative Residual Effects
	<p>It is therefore predicted that cumulative disturbance/ displacement effects will be of low adverse magnitude and not significant.</p> <p>CRM was undertaken for two sites in addition to the Proposed Development giving an estimate of 0.045 collisions per year across all sites. This represents 0.2 % of the breeding population estimate for NHZ 10.</p> <p>Therefore, cumulative collision risk is predicted to be of low adverse magnitude at the regional level resulting in no significant effect.</p>		
<p>Red kite</p>	<p>CRM was undertaken for one site in addition to the Proposed Development giving an estimate of 0.24 collisions per year across the two sites. This represents 0.24 % of the breeding population estimate for NHZ 21 and 0.3 % of the 84 breeding birds estimated in Highland in 2019. Therefore, cumulative collision risk is predicted to be of low adverse magnitude at the regional level, resulting in no significant effect.</p>	<p>0.115 birds predicted to collide per year.</p>	<p>The cumulative CRM total for all developments is 0.355 birds per year. This represents 0.36 % of the breeding population estimate for NHZ 21 and 0.4 % of the breeding birds estimated in Highland in 2019. This is not substantially changed compared with that predicted in the EIA Report.</p> <p>Therefore, the cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p>
<p>Curlew</p>	<p>A total of 23 curlew territories were recorded within 500 m of infrastructure at the listed developments. Together with the four pairs recorded within 500 m of the Proposed Development this represents 3.3 % of the breeding population estimate for NHZ 10 of 811 pairs. However, there is extensive nesting and foraging habitat in the area surrounding the three developments. It is therefore unlikely that all pairs will be permanently displaced by these wind developments. Furthermore, wet heath and blanket bog habitat management at the Proposed Development will improve foraging and nesting habitat for curlew away from turbines.</p> <p>CRM was undertaken for two sites in addition to the Proposed Development giving an estimate of 0.33 collisions per year across all</p>	<p>A total of one curlew territory was recorded within 500 m of the site. Disturbance/displacement impacts for curlew were not assessed due to the low activity.</p> <p>No collision effect was predicted.</p>	<p>A total of 28 curlew territories recorded within 500 m of infrastructure, which represents 3.5 % of the breeding estimate for NHZ 10. This is not substantially changed compared with that predicted in the EIA. Therefore, the cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p> <p>As there is no predicted impact to additional collision risk predicted there is no change in the cumulative collision effect. Therefore, these effects are</p>

IOF	EIA Cumulative Residual Effects	TnCExt	Total Cumulative Residual Effects
	<p>sites. This represents 0.02 of the breeding population estimate for NHZ 10.</p> <p>Therefore, cumulative disturbance/ displacement and collision impacts are predicted to be of low adverse magnitude at the regional level, resulting in no significant effect.</p>		<p>predicted to be of low adverse magnitude and not significant.</p>
<p>Golden plover</p>	<p>A total of 22 golden plover territories were recorded within 500 m of infrastructure at the listed developments. Together with the seven pairs recorded within 500 m of the Proposed Development this represents 0.8 % of the breeding population estimate for NHZ 10 of 2,702 pairs. However, there is extensive nesting and foraging habitat in the area surrounding the three developments. It is therefore unlikely that all pairs will be permanently displaced by these wind developments. Furthermore, wet heath and blanket bog habitat management at the Proposed Development will improve foraging and nesting habitat for golden plover away from turbines.</p> <p>CRM was undertaken for one site giving an estimate of 0.06 collisions per year. This represents 0.001 % of the breeding population estimate for NHZ 10.</p> <p>Therefore, cumulative disturbance/ displacement and collision impacts are predicted to be of low adverse magnitude at the regional population level; therefore no cumulative significant effects are predicted.</p>	<p>A maximum of three golden plover territory were recorded within 500 m of the site. Disturbance/displacement impacts for golden plover were not assessed due to the low activity.</p> <p>No collision effect was predicted.</p>	<p>A total of 25 golden plover territories recorded within 500 m of infrastructure, which represents 0.9 % of the breeding estimate for NHZ 10. This is not substantially changed compared with that predicted in the EIA. Therefore, the cumulative collision risk is still predicted to be of a low adverse magnitude at the regional level, resulting in no significant effect.</p> <p>As there is no predicted impact to additional collision risk predicted there is no change in the cumulative collision effect. Therefore, these effects are predicted to be of low adverse magnitude and not significant.</p>

5. Ecology

5.1. Introduction

5.1.1 This section provides an updated assessment of potential cumulative impacts on ecological receptors relevant to the Proposed Development. It also includes updated habitat loss calculations (HLC) and clarification on selection of habitat restoration areas at the request of NatureScot. For all other information refer to **Chapter 8** of the **EIA Report**.

5.2. Consultee Feedback and Applicant Response

5.2.1 Responses on Ecology matters were received from NatureScot and the RSPB and are summarised in **Table 5.1** below along with the Applicant's response.

Table 5.1 - Summary of Consultee Feedback and Applicant Response

Comment	Applicant's Response
NatureScot –29 April 2022	
<p>Note that in EIA Report Table 8.8 Modified Bog is considered representative of the Annex 1 habitat 'Degraded raised bogs still capable of natural regeneration'. If these habitats are on areas of raised bog then further consideration is likely to be required. Welcome clarification of the nature and status of these habitats.</p> <p>Advise that all losses, even those anticipated to be temporary, should be considered potentially permanent and included in any calculations related to compensatory habitat restoration measures.</p> <p>While EIA Report Table 8.8 describes the habitat loss figures we also note that these are determined from the infrastructure footprint and do not take account of disturbance associated with construction or post-construction hydrological effects. They are therefore likely to underestimate total losses.</p>	<p>All areas of modified bog were on areas of blanket bog rather than raised bog. Areas of modified bog were classified as such due to a lack of <i>Sphagnum</i> moss, as described in the Phase 1 Habitat Survey Methodology¹. The majority of the modified bog habitats were relatively typical M19a blanket bog (<i>Calluna vulgaris-Eriophorum vaginatum</i> blanket mire, <i>Erica tetralix</i> sub-community) but lacking coverage of <i>Sphagnum</i> mosses. Some areas showed signs of recent burning and drainage ditches were common. There was minimal peat haggings across the site. It is therefore considered that burning and drainage were the main modification factors impacting areas of blanket bog.</p> <p>HLCs have been updated to include all temporary loss. See Section 5.3 below for full details.</p>
<p>While welcoming the proposals for peatland restoration, we cannot assess their appropriateness in the absence of information on total losses (the sum of direct and indirect, permanent and temporary losses). However, noting that wet heath losses are predicted to be around 25 ha, and bog habitat losses around 11 ha, consider that the restoration extent figures (around 55.8 ha modified and degraded wet heath, and 38.5 ha modified bog) are unlikely to compensate for these losses.</p>	<p>HLC has been updated to include all temporary loss. See Section 5.3 for full details.</p> <p>A full Habitat Management Plan (HMP) will be created post-consent in consultation with NatureScot with additional restoration areas included, as required.</p>
<p>Support the overall Aims, Objectives and Methods described in the OHMP. However, are unclear as to</p>	<p>Information as to how restoration areas were selected is included in Section 5.4 below.</p>

¹ JNCC 2010. Handbook for Phase 1 Habitat Survey – a technique for environmental audit. JNCC, Peterborough

Comment	Applicant's Response
<p>how the restoration areas were selected and as indicated above, would welcome more ambitious plans for restoration, given the anticipated extent of habitat loss and damage. In addition to identifying additional and/or larger areas for habitat restoration, there may be opportunities for wider, low-cost measures such as the removal of any invasive non-native trees from the area.</p>	<p>A full HMP will be created post-consent in consultation with NatureScot with additional restoration areas included, as required.</p> <p>There are no areas of non-native tree encroachment on bog or wet heath within the Proposed Development Area and therefore this restoration method would not be applicable. See Section 5.4 below for further information about how the OHMP restoration areas were selected.</p>
<p>RSPB –18 February 2022</p>	

Note that the area identified for blanket bog restoration is adjacent to, and almost surrounded by turbines and track infrastructure. The proposed wet heath restoration area is also adjacent to wind farm infrastructure. To ensure that restoration areas are provided which deliver for breeding waders we would recommend that additional areas for blanket bog/wet heath restoration are identified which are a minimum of 500 m from turbine, infrastructure and standing forestry

A full HMP will be created post-consent in consultation with NatureScot, which will likely include additional restoration areas. Where possible these will be over 500 m from turbine infrastructure, if areas are suitable for bog or wet heath restoration (i.e. presence of drainage ditches that can be blocked).

5.3. Updated Habitat Loss Calculations

- 5.3.1 Habitat loss was recalculated to include all areas of temporary and permanent habitat loss (direct habitat loss) based on advice from NatureScot as part of the consultee responses. Methods for the habitat loss calculations can be found in **Appendix 8.1** of the **EIA Report**. The following infrastructure was included within these calculations:
- 2 Construction compounds (100 m x 100 m)
 - 17 Crane pads (95 m x 40 m)
 - 1 Meteorological mast (5 m x 5 m)
 - Proposed new and upgraded tracks (6 m width, with buffers of 4 m each side for floating sections and 8 m each side for cut sections)
 - Substation (100 m x 130 m, plus buffer of 8 m on all sides for embankment)
 - 17 Turbine foundations (30 m diameter)
 - Borrow pits (using total borrow pit search area as a precautionary measure, totalling an area of 4 ha. It is highly unlikely that all of this area will be used)
- 5.3.2 Potential indirect loss through hydrological disturbance, such as drainage, has also been calculated. This has been estimated at a 10 m zone of influence around all proposed infrastructure (permanent and temporary) in line with the carbon calculator assumptions. This is considered to be a worst-case scenario as the distance of the impacts of drainage on peatland are highly variable. Furthermore, drying effects from drainage are unlikely to modify habitats in such a way as to undergo a major change of overall habitat type (i.e. bog or wet heath). It is most likely that there would be a subtle shift in the vegetative community to a drier type. In extreme cases drying may result in the shift of the vegetation to a drier habitat, in which case it is expected that bog habitats would change to wet or dry heath and wet heath would change to dry heath. Blanket bog, wet heath and dry heath are all Annex 1 habitats and therefore are all habitats of conservation interest. The current state of the bog and wet heath habitats that will be impacted is modified and heavily drained. Therefore, some further modification through drainage is unlikely to cause a significant change to the bog and wet heath habitats in the Proposed Development Area.
- 5.3.3 Additional temporary habitat loss has been calculated for dry dwarf shrub heath, wet dwarf shrub heath and dry modified bog. With the addition of temporary habitat loss, the percentage

of total direct dry heath loss is 4.2 % of the habitat recorded within the Proposed Development Area (compared with 1.8 % permanent dry heath loss). Areas of temporary dry heath loss are from the borrow pit search areas only. Borrow pits are highly unlikely to take up the whole search area, therefore the predicted area of temporary loss for dry heath is a worst-case scenario. Additionally, 1 ha of temporary wet heath loss is from the borrow pit search areas meaning that the temporary loss calculated for this habitat is also a conservative estimate. Nevertheless, the percentage of temporary dry heath loss is significant without mitigation. However, mitigation measures in the OHMP to benefit ground nesting raptors (a reduction in heather management within a 163 ha area) are considered to be more than sufficient to compensate for the temporary loss of dry heath habitats at the Proposed Development. This means that there are no significant residual effects on dry heath.

5.3.4 A total of 26.17 ha of direct wet heath loss is predicted when temporary habitat loss is included. Additionally, it is predicted that 17.36 ha of wet heath could be indirectly impacted by the Proposed Development. Therefore, the total amount of predicted wet heath loss is 43.53 ha. A total of 9.76 ha of direct loss of bog habitats (modified and blanket bog combined) is predicted as no temporary habitat loss was predicted for bog habitats. Additionally, it is predicted that 8.70 ha of bog could be indirectly impacted by the Proposed Development. Therefore, the total amount of predicted loss of bog is 19.46 ha. As previously discussed, total habitat loss through indirect hydrological disturbance is highly unlikely for either wet heath or blanket bog. Currently an area of 55.8 ha of wet heath (just over twice the amount of total predicted direct loss) and an area of 38.5 ha of modified bog (just under four times the amount of predicted direct loss and just under twice the amount of total predicted loss) are proposed for restoration as part of the OHMP. There are other areas within the Proposed Development Area that would be suitable for habitat restoration of both wet heath and blanket bog if required. The areas of restoration will be agreed with NatureScot and landowners as part of the HMP written prior to construction commencing.

Table 5.2 - Summary of Habitat Loss

Phase 1 Habitat	Area in site boundary (ha)	Area of permanent habitat loss (ha)	Area of temp habitat loss (ha)	Total area of direct habitat loss (ha)	Total % of direct habitat loss	Area of indirect loss (ha)	% indirect loss
A1.2.1 Semi-natural coniferous woodland	10.17	0	0	0	0	0	0
A2.1 Scrub	0.1	0	0	0	0	0	0
B1.1 Unimproved acid grassland	15.68	0.51	0	0.51	3.25	0.42	2.68
B1.2 Semi-improved acid grassland	2.07	0	0	0	0	0	0
B2 Neutral grassland	0.84	0.06	0	0.06	7.14	0.06	7.14
B4 Improved grassland	1.57	0	0	0	0	0	0
B5 Marshy grassland	22.63	0.54	0	0.54	2.39	0.59	2.61
C1 Bracken	0.68	0	0	0	0	0	0

Phase 1 Habitat	Area in site boundary (ha)	Area of permanent habitat loss (ha)	Area of temp habitat loss (ha)	Total area of direct habitat loss (ha)	Total % of direct habitat loss	Area of indirect loss (ha)	% indirect loss
D1.1 Acid Dry dwarf shrub heath	105.21	1.85	2.54	4.39	4.17	2.45	2.33
D2 Wet dwarf shrub heath	581.07	24.15	2.02	26.17	4.50	17.36	2.99
D5 Dry heath/acid grassland mosaic	3.08	0	0	0	0	0	0
E1.6.1 Blanket bog	38.8	0.25	0	0.25	0.64	0.23	0.59
E1.7 Wet modified bog	32.54	0.87	0	0.87	2.67	0.92	2.83
E1.8 Dry modified bog	468.89	8.63	0	8.63	1.84	7.55	1.61
E2.1 Acid flush	23.89	0.04	0	0.04	0.17	0.03	0.13
E2.2 Basic flush	0 (habitat outside site boundary)	0	0	0	0	0	0
F1 Swamp	0.12	0	0	0	0	0	0

5.4. Clarification on Selection of OHMP Restoration Areas

- 5.4.1 Following comments from consultees additional detail is provided in this section on the selection of habitat restoration areas in the OHMP, as shown in **Figure 8.6** of the **EIA Report**.
- 5.4.2 The bog restoration area (38.5 ha) is located in a large area of M19a modified bog and the wet heath restoration area (55.8 ha) is located in a large area of M15c wet heath. Neither area is intersected by proposed infrastructure. Both areas contain regular drainage ditches that are likely to be suitable for ditch blocking. Additionally, both areas are close to areas in which high curlew activity was recorded during the 2018 and 2019 breeding seasons. Three curlew and four golden plover territories were recorded within 1 km of the bog restoration area during 2018 breeding bird surveys; four curlew territories were recorded within 1 km of the wet heath restoration area during 2018 breeding bird surveys. Therefore, restoration of these areas is more likely to benefit these species.
- 5.4.3 All restoration areas outlined in the OHMP are in the landownership boundary and have been agreed with the landowner. NatureScot have suggested that further habitat restoration may be required in order to fully compensate for wet heath and blanket bog losses as part of the Proposed Development. There are other areas within the Proposed Development Area that would be suitable for restoration of both wet heath and blanket bog if required. However, any additional restoration areas within the landownership boundary would also need to be agreed with the landowner. The final habitat restoration areas will be decided on and defined in the HMP written prior to construction commencing. This will be agreed upon with NatureScot.

5.5. Updated Cumulative Assessment

- 5.5.1 The cumulative impact assessment has been updated to include the updated HLC figures and the nearby TnCExt. See **Table 5.3** below

5.6. Summary

- 5.6.1 This FEI chapter updates the Ecology assessment within the EIA Report, when taking into consideration the responses and the updated cumulative impact assessment. This update has not altered the overall conclusions of the EIA Report, which is no significant residual effects on ecological features.

Table 5.3 - Summary of Cumulative Effects

IEF	EIA Cumulative Residual Effects	Updated Lethen Wind Farm HLC	TnCExt	Total Cumulative Residual Effects
Bats (collision risk)	Low beneficial impact predicted at Cairn Duhie and low adverse impact predicted at TnC for all bat species recorded (at the Local/Site level). It is considered that these impacts counteract one another, leaving cumulative impact as Moderate adverse for pipistrelles and Low adverse for Myotis sp. at the Local level as predicted for the Proposed Development.	-	Low adverse impact predicted. Proposed Development was assessed as part of the cumulative impact assessment, for which additional cumulative impacts were considered to be negligible due to the distance between the two developments.	The cumulative impact to bats is considered to be unchanged with the addition of TnCExt. Therefore, the cumulative impact is predicted to be Moderate adverse for pipistrelles and Low adverse for Myotis sp. at the Local level.
Bog	39.13 ha lost Cairn Duhie and Tom nan Clach. Habitat restoration at TnC.	9.75 ha permanent habitat loss, 8.7ha potential indirect impact. 38.5 ha currently proposed for restoration. Additional restoration areas to be determined as part of HMP.	9.2 ha permanent habitat loss, 160.1 ha indirect impact. Further restoration proposed under OHMP. Areas not yet defined.	58.08 ha permanent loss (0.4 % of NHZ 10 estimate), 168.8 ha potential indirect impact (1.2 % of NHZ 10 estimate). Habitat restoration proposed at TnC and TnCExt, as well as at the Proposed Development. Amount of restoration to be confirmed following discussion with consultees regarding the HMP. A minimum of 38.5 ha to be restored at the Proposed Development, just under four times the amount of direct habitat loss from the Proposed Development. Additional bog restoration undertaken at TnC and TnCExt to compensate for losses at those sites. Therefore, after mitigation the cumulative impact is Low adverse .
Wet heath	19.44 ha lost Cairn Duhie and TnC.	24.15 ha permanent habitat loss, 2.02 ha temporary loss, 17.36 ha potential indirect impact. 55.8 ha proposed for restoration. Additional restoration areas to be determined as part of HMP.	No loss predicted.	43.59 ha permanent loss (3.3 % of NHZ 10 estimate), 17.36 ha (1.3 % of NHZ 10 estimate) potential indirect impact. Habitat restoration proposed at Proposed Development. Amount of restoration to be confirmed following discussion with consultees regarding the HMP. A minimum of 55.8 ha to be restored at the Proposed Development, just over twice the amount of direct habitat loss from the Proposed Development and more than the total cumulative permanent habitat loss. Therefore, after mitigation the cumulative impact is Low adverse .

6. Hydrology, Geology and Hydrogeology

6.1. Introduction

6.1.1 This section provides an updated assessment of potential cumulative impacts on ecological receptors relevant to the Proposed Development. It also includes information and responses to matters raised in relation to Hydrology, Geology and Hydrogeology by consultees. For all other information refer to **Chapter 9** of the **EIA Report**.

6.2. Consultee Feedback and Applicant Response

6.2.1 Responses on Hydrology, Geology and Hydrogeology matters were received from SEPA and Ironside Farrar (advisor to the Scottish Government). These are summarised in **Table 6.1** below along with the Applicant's response.

Table 6.1 - Summary of Consultee Feedback and Applicant Response

Comment	Applicant's Response
SEPA –15 February 2022	
No objection to the Proposed Development subject to conditions to minimise negative impacts on peat and carbon loss.	Proposed conditions noted and agreed by the Applicant
IronsideFarrar	
March 2022 - Stage 1 Checking Report. A number of clarifications were requested alongside wider recommendations.	The Applicant provided responses to the clarifications requested (April 2022) – this is included in Appendix A6.1 of the FEI .
May 2022 - Stage 2 Checking Report Further two recommendations requiring response made.	The Applicant undertook further peat probing in response to the Stage 2 Checking Report. An updated Peat Slide Risk Assessment is provided in Appendix A6.2 of the FEI .

6.3. Peat Soils

6.3.1 In March 2022, Ironside Farrar, on behalf of the Scottish Government, issued a review of **Appendix 9.2** (Peat Slide Risk Assessment) of the **EIA Report** which identified a requirement for further environmental information concerning additional peat depth data.

6.3.2 Further detailed probing has been undertaken based on the external recommendations of Ironside Farrar in their Stage 1&2 Checking Reports (Ref: 63068). Following this the peat slide risk assessment report has been reviewed with view of the additional soil probing information.

6.3.3 This additional field survey phase and risk assessment review addresses the remaining open recommendations as presented in the Stage 2 Checking Report (63068):

- No.3: Additional detailed probing is required at all infrastructure locations.
- No.10: Following additional probing review risk assessment at discrete track section between T16/T17 and either side of T10.

6.3.4 Additional detailed soil probe data points were collected across the proposed infrastructure layout targeting areas to increase the density of recorded data points. The findings of this additional probing correlates with the existing conclusions on peat depth and distribution across this development. The topography across the study area is dominated by a large open basin with shallow terrain slope angles.

- 6.3.5 Peat is present across disconnected areas which have been subject to historical drainage and modification. Where peat is present it is predominantly less than <0.5m depth. Thus the shallow terrain slope angles coupled with shallow peat places the development within the lowest peat slide risk categories.
- 6.3.6 Following review of this additional probing information Natural Power has not found any increase in the peat slide risk categorisation for the development including those devised for track section T16-T17 and surrounding T10. Natural Power therefore stands by the conclusions of the original report. The updated peat depth interpolation map is provided in **Figure A6.1** for information.
- 6.3.7 Phase 1 and detailed peat depth surveys results were presented in **Table 9.12** in **Chapter 9 of the EIA Report, Hydrology, Hydrogeology and Geology**. Following the completion of additional surveys, the peat depth statistics presented in **Table 9.12** of the **EIA Report** have been updated and are presented in **Table 6.2** below.

Table 6.2 - Updated Phase 1 and Detailed Peat Depth Survey Results

Peat Depth Range (m)	Count	Percentage of Points
<=0.5	2,398	56.2
>0.5-1.0	893	21.0
>1.0-1.5	366	8.6
>1.5-3.0	479	11.1
>3.0	130	3.1
Total	4266	100

- 6.3.8 An updated map displaying the range of peat depths across the Proposed Development is presented in **Figure A6.1** of this **FEI Report**. Peat depths recorded remain predominately within the range of <= 0.5 m (56.2% of total surveyed points). In terms of spatial coverage, the steeper slopes at the southern end of the Proposed Development recorded the shallower peat depths. Within the surveyed area pockets of deeper peat within the range of 1.5 to greater than 3 m were identified within the north-eastern and central section of the Proposed Development.
- 6.3.9 In line with current guidance², peat is defined as an organic soil which contains 60% organic matter and exceeds 0.5 m in thickness. 43.8% of the recorded depths across the Proposed Development are greater than 0.5 m.
- 6.3.10 Following the update of the peat depth information, **Appendix 9.2 Peat Slide Risk Assessment** of the **EIA Report** has been updated and provided in **Appendix A6.2** of this **FEI Report**. The Peat Slide Risk Assessment concludes that proposed Development has been characterised in the lowest peat slide risk category, as per the original assessment which accompanied the EIA Report.
- 6.3.11 No other information or assessments provided in the EIA Report which are related to site soils and peat are altered by the additional detail provided in this Addendum. The peat depths collected were predominantly <0.5 m and as a consequence, the Stage 1 Peat Management

² The Scottish Government (2017), Guidance on Developments on Peatland

Plan (**Appendix 9.3** of the **EIA Report**) including any conclusions and recommendations remain valid.

- 6.3.12 All conclusions in the EIA Report regarding the significance of effects on site soils and peat remain as assessed in the EIA Report.

6.4. Updated Cumulative Assessment

- 6.4.1 The existing access track for the existing TnC Wind Farm and proposed TnCExt is adjacent to the northern boundary of the Proposed Development.
- 6.4.2 Both TnCExt and the Proposed Development are located wholly within the catchment of the River Findhorn and both will utilise wholly, or partially, the existing TnC Wind Farm access tracks. There is the potential for cumulative effects to occur if both developments are constructed at the same time.
- 6.4.3 As outlined in the EIA Report for the Proposed Development off-site cumulative hydrological effects are primarily related to changes in water quality and increases in flood risk. Mitigation has been presented in **Section 9.8** and **9.10** of the **EIA Report** to adequately protect on-site hydrological receptors and therefore will be suitable to ensure the protection of those situated downstream and should not contribute to or exacerbate any effects arising from other developments, land uses or activities. With regards to flood risk specifically, the design of the drainage will mimic the existing hydrological and greenfield regime of the Proposed Development area. Opportunities for natural flood management through peatland restoration have also been identified and are outlined in **Section 9.10** and **Appendix 8.3 Outline Habitat Management Plan** of the **EIA Report**.
- 6.4.4 It is therefore concluded that following the successful implementation of the mitigation outlined in **Section 9.8** and **9.10** of the **EIA Report** and on the assumption that the proposed TnCExt would follow industry good practice and have stringent mitigation and monitoring, cumulative impacts of the Proposed Development and TnCExt during construction, should they be constructed simultaneously, and during operation will be **negligible**.

6.5. Summary

- 6.5.1 This FEI chapter updates the Hydrology, Geology and Hydrogeology assessment within the EIA Report, when taking into consideration peat depths and concomitant peat slide risk as well as the potential for cumulative impacts arising from the proposed Tom Na Clach Wind Farm Extension. This update has not altered the overall conclusions of the EIA Report, which is no significant residual effects on Hydrology, Geology and Hydrogeology at the site.

7. Noise and Vibration

7.1. Introduction

7.1.1 This section provides an updated noise assessment of potential cumulative effects as a result of the Proposed Development. It also includes information and responses to matters raised in relation to noise by consultees. For all other information refer to **Chapter 10** of the **EIA Report**.

7.2. Consultee Feedback and Applicant Response

7.2.1 Responses on noise matters were received from THC and are summarised in **Table 7.1** below along with the Applicant's response.

Table 7.1 - Matters Raised in Relation to Noise and Vibration

Comment	Applicant's Response
The Highland Council – 25 February 2022	
It is expected that the developer will employ the best practicable means to reduce the impact of noise during construction.	Noted and agreed by the Applicant.
THC advise a cap to be put in place, restricting noise limits to 2dB above predicted levels (as per Table 10.12 of the EIA Report).	Noted and agreed by the Applicant
The Highland Council – Meeting Dated 03 May 2022	
Potential cumulative noise effects with Tom na Clach Wind Farm Extension should be considered.	Noted. This is discussed further within Section 7.3 below of this FEI Report .

7.3. Updated Cumulative Assessment

7.3.1 The proposed Tom na Clach Wind Farm Extension (TnCExt) has yet to be constructed and is therefore not currently affecting the baseline noise environment. Furthermore, noise effects associated with wind farms require consideration of the baseline noise environment in the absence of noise from wind turbines, and as such, no update to the baseline characterisation is required.

7.3.2 This FEI re-considers the potential for cumulative noise effects arising between the proposed Lethen Wind Farm and Tom nan Clach Wind Farm (TnC) including the proposed TnCExt at Noise Sensitive Receptors (NSRs) follows:

- NSR8 – Quilichan;
- NSR9 – Daless; and
- NSR10 – Balvraid

7.3.3 At all other NSRs there is no potential for cumulative noise effects between TnC/TnCExt and the proposed Lethen Wind Farm, based on predicted worst-case noise levels.

7.3.4 The noise assessment provided in the TnCExt EIA Report provides predicted noise levels from TnCExt operating in isolation and cumulatively, considering all other wind turbines in the study area, including the turbines of the Proposed Development (refer to Table 8.5, TNC Vol 1 Chapter 8); these are reproduced in **Table 7.2**.

Table 7.2 - Predicted noise levels for TnCE operation in isolation and cumulatively at 10 m/s standardised wind speed

NSR	Predicted noise level, dBL _{A90}	
	TnCE – in isolation	Cumulative
NSR8 – Quilichan	24	33
NSR9 – Daless	24	32
NSR10 - Balvraid	21	27

- 7.3.5 We note that the predicted cumulative noise level at all NSRs meets the 35 dB lower daytime fixed minimum limit at all NSRs.
- 7.3.6 In the noise assessment provided in the Proposed Development EIA Report, potential cumulative noise impacts associated with TnC at NSR8, NSR9 and NSR10 are considered. The assessment notes that the predicted noise level due to the proposed Lethen Wind Farm at each of these NSRs is below 25 dBL_{A90,10min} and, as such, could not contribute to any exceedance of the 35 dB simplified ETSU noise limit. No further assessment of potential cumulative effects with TnC at NSR8, NSR9 and NSR10 was therefore required.
- 7.3.7 This FEI notes the above and adopts the same approach; the addition of TnCExt will increase the overall wind turbine noise level at NSR8, NSR9 and NSR10 but, according to the predicted levels presented in its EIA Report the cumulative noise level from all turbines will meet the simplified ETSU 35 dBL_{A90} noise limit by a margin of 2 dB or greater. The predicted noise level at these NSRs due to the Proposed Development remains unchanged as a result of TnCExt and therefore cannot contribute to any exceedance of the 35 dBL_{A90} noise limit.
- 7.3.8 Cumulative noise effects during the operational phase of the Proposed Development therefore remain not significant at these NSRs.
- 7.3.9 On the basis of the above this FEI notes that no additional mitigation is required, and residual effects remain not significant.

7.4. Summary

- 7.4.1 This FEI chapter updates the noise assessment within the EIA Report, taking into consideration the potential for cumulative noise effects associated with the proposed TnCExt. This update has not altered the overall conclusions of the EIA Report, which has determined no significant residual effects.

8. Cultural Heritage

8.1. Introduction

- 8.1.1 **Chapter 11** of the **EIA Report** chapter identified the archaeological and cultural heritage value of the site and assessed the potential for significant effects on heritage assets resulting from the construction, operation and decommissioning of the Proposed Development. The EIA Report chapter also identified measures that should be taken to mitigate predicted adverse effects.
- 8.1.2 Historic Environment Scotland (HES) responded to the ECU on 14 April 2022 and have objected to the application on the grounds that the impact of the Proposed Development on the setting of the Scheduled Monument known as Lochindorb Castle (SM 1231) would, in their view, impact on the integrity of the monument's setting and thus be contrary to *Scottish Planning Policy (SPP), paragraph 145*.
- 8.1.3 The Highland Council Historic Environment Team (THCHET) responded to the THC on 23 May 2022 noting a significant adverse impact on the setting of Lochindorb Castle and Alltlaigh Farmstead. The THCHET response concluded that the Proposed Development would not accord with *Highland Council Planning Policy 47, the Highland Historic Environment Strategy nor SPP, paragraph 145*.

8.2. Consultee Feedback and Applicant Response

- 8.2.1 Responses on cultural heritage matters were received from HES and THCHET and are summarised in **Table 8.1** below along with the Applicant's response.

Table 8.1 - Summary of Consultation Feedback and Applicant Response

Comment	Applicant's Response
Historic Environment Scotland –14 April 2022	
As the EIA progressed HES have focussed advice on just Lochindorb Castle (p3).	Noted. No response required.
The Proposed Development layout has moved Turbines 15 and 16 closer to Alltlaigh farmstead, and this has increased impact on the monument since our most recent advice (p3).	Noted. The EIA Report identified a significant adverse effect on the setting of this monument but concluded that the integrity of its setting would not be impacted.
No other effects identified that are likely to be contrary to policy for our interests (p3).	Noted. No response required.
The proposals would significantly undermine Lochindorb Castle's presence in its setting by detrimentally affecting several key factors of that setting, namely: <ul style="list-style-type: none"> - Its current landscape context in an enclosed, largely featureless, topographic bowl - Sequential views experienced from the roadside on the east of the loch - The castle's scale relative to its surroundings - The relationship between the bulky, angular form of the castle and the surrounding landscape, which provides a stark contrast 	It is not agreed that castle's presence would be significantly undermined. This is discussed in the EIA Report at Section 11.7.12-11.7.15 and further discussed within Section 8.3.3-8.3.16 below of this FEI Report .

Comment	Applicant's Response
<p>The aesthetic value of the castle in its setting. The castle is in a relatively remote and featureless upland landscape (p8-9)</p>	
<p>The impact identified is significant and adverse (p9).</p>	<p>Noted. A significant adverse effect was identified in the EIA Report (Section 11.7.14).</p>
<p>This impact affects factors of Lochindorb Castle's setting that contribute to its cultural significance (p9).</p>	<p>Noted. Agreed that some factors of setting that contribute to cultural significance will be affected by the Proposed Development.</p>
<p>The ability to understand, appreciate and experience the monument would be diminished and would affect the integrity of the setting of the monument (p9)</p>	<p>The ability to understand, appreciate and experience the monument would be adequately retained and the integrity of setting would not be affected. This is further discussed within Section 8.3.16 below of this FEI Report.</p>
<p>HES have not identified any exceptional circumstances and thus the Proposed Development is contrary to <i>SPP paragraph 145</i> (p10).</p>	<p>The Applicant does not agree that there would be an impact on the integrity of setting and thus the exceptional circumstances test required by <i>paragraph 145</i> of SPP is not engaged. Without prejudice to this position, if the Scottish Ministers were to conclude that the integrity of the setting would be impacted, contribution of the Proposed Development as a response to the Climate Emergency would be an exceptional circumstance for the purposes of paragraph 145 of SPP.</p>
<p>Impacts on the setting of the castle have been a consideration in the iterative design process (p10)</p>	<p>Noted. No response required.</p>
<p>It may not be viable for the applicant to redesign to such a degree that we can withdraw our objection without significantly altering the scope of the proposals (p11).</p>	<p>Noted. The layout considered for this FEI Report is unchanged from that considered in the EIA Report.</p>
<p>No offsetting measures would alter the effect on the integrity of setting of a scheduled monument. Any beneficial impacts are a separate consideration from the policy test set out in SPP (p12).</p>	<p>Noted. Offsetting measures were identified following identification of a significant effect on the setting of Lochindorb Castle as outlined in 11.8.4 of the EIA Report. The offsetting measures aimed to increase the ability to enjoy, appreciate, learn from and understand Scotland's historic environment as per HEP2 of HEPS (HES 2019) and should be considered in the planning balance.</p>
<p>The methodology used for assessing impacts on cultural heritage is appropriate (p12)</p>	<p>Noted.</p>
<p>The methodology used for the cultural heritage assessment in the EIA Report includes an extra step which we do not think is necessary. This is only used for setting impacts and uses the criteria set out in Table 11.3 to assign a value for 'relative sensitivity'. (p12)</p>	<p>Table 11.3 in the EIA Report aligns with Stage 2 of the HES Managing Change guidance note on setting (HES 2020). It recognises that to assess an impact on setting, it is necessary first to consider the factors of setting that contribute to the cultural significance of an asset. The criteria in the table are intended as a guide with each asset assessed on an individual basis following site visits.</p>

Comment	Applicant's Response
<p>The key concern when identifying impact on heritage assets is whether cultural significance is affected. This is in line with the advice in the <i>EIA Handbook, Appendix 1</i>. (p13)</p>	<p>Noted and agreed.</p>
<p>The assessment approach does not consider all of the impacts on the factors contributing to setting and cultural significance (p14).</p>	<p>The EIA Report (Section 11.7.11-11.7.14) assessed impacts on those factors considered to contribute to setting and cultural significance. Further discussion of these factors with direct reference to the Managing Change Guidance note on Setting (HES 2020) is provided further within Section 8.3.3-8.3.12 below of this FEI Report.</p>
<p>The approach the assessment takes is to separate the surroundings of the castle into a 'core setting' and 'wider context'. In these terms, the proposed development is within the 'wider context'. We disagree with this assessment</p>	<p>It is maintained that the approach taken is appropriate. The core setting of the castle is referenced only once in the EIA Report (Section 11.7.14) and the wider setting is referenced with regards to the landscape context of the setting.</p>
<p>Heritage Viewpoint 9 shows a view of turbines 11, 12 and 13 directly behind the castle and competing with it for scale. It seems likely that this effect would be repeated for T10 and T9 if moving south along the loch-side road. The assessment does not identify this particular impact (p14).</p>	<p>This is discussed within Section 8.3.8 below of this FEI Report.</p>
<p>Consider that the existing Tom nan Clach turbines affect the ability to understand and appreciate the castle in its setting and consider the existing impact setting of the castle to be significant (p14)</p>	<p>The applicant considers that it is still possible to understand, appreciate and experience the castle in its current setting. This is discussed further within Section 8.3.9 below of this FEI Report.</p>
<p>The disagreement regarding impact on integrity of setting is likely to be caused by a difference of professional judgement rather than different interpretations of policy and guidance.</p>	<p>Noted. No response required.</p>
<p>The Highland Council Historic Environment Team - 23 May 2022</p>	
<p>The application as submitted will adversely impact on the setting of Lochindorb Castle and Alltlaogh farmstead.</p>	<p>Noted. The EIA Report identified a significant adverse effect on the setting of these monuments but concluded that the integrity of setting would not be impacted in each case.</p>
<p>Lochindorb Castle is a highly sensitive receptor due to its secluded, setting and accessibility</p>	<p>It is agreed that Lochindorb Castle is sensitive to changes in its setting. Note that accessibility is not considered relevant in assessing impacts on setting in the <i>HES Managing Change Guidance</i> document on setting (HES 2020).</p>
<p>The application does not accord with <i>Highland Council Policy 57</i></p>	<p>Noted. <i>Highland Council Policy 57</i> does not allow any significant effects on assets of national importance unless they are outweighed by social or economic benefits of national importance. This is discussed further within Section 8.3.17 below of this FEI Report.</p>

Comment	Applicant's Response
<p>The application does not accord with the Highland Historic Environment Strategy (specifically Strategic Aim 16)</p>	<p>Strategic Aim 16 refers to the protection of non-designated archaeological sites and landscapes and their settings. No significant effects on non-designated assets were identified in the EIA Report. This is discussed further within Section 8.3.18 below of this FEI Report.</p>
<p>The application does not accord with Scottish Planning Policy paragraph 145</p>	<p>The EIA Report at paragraph 11.7.15 concludes that there would be no impact on integrity of setting.</p>

8.3. Response to Matters Raised

Historic Environment Scotland Response

- 8.3.1 There are points of divergence between the Applicant and HES in the analysis of how Lochindorb Castle is understood, appreciated and experienced in its current setting. HES concludes on page 15 of the response that this divergence is likely to be caused by a difference of professional judgement rather than different interpretations of policy and guidance. The Applicant agrees with HES that the differences in assessment relate primarily to differences in professional judgement. The principle area of divergence appears to relate to the factors of setting identified in pages 8-9 of the HES response that it considers would significantly be undermined by the Proposed Development. The Applicant agrees that these factors contribute to an understanding of the cultural significance of the castle but disagrees with regard to the extent to which they contribute to setting and the extent to which they would be impacted by the Proposed Development.

[Factors to be considered in assessing the impact of a change on the setting of a historic asset](#)

- 8.3.2 Page 14 of the HES response notes that the assessment approach does not consider all of the impacts on the factors contributing to setting and cultural significance. The Applicant maintains that relevant factors were considered in the **EIA Report** but for completeness considers impacts of the Proposed Development against the factors identified in the *Managing Change Guidance* (HES 2020, 10-11) below:

Whether key views to or from the historic asset or place are interrupted

- 8.3.3 Views west from the castle towards the site are of open rolling moorland beyond the western shore and feature the turbines of Tom nan Clach on the skyline. These views make a relatively limited contribution to an understanding, appreciation and experience of the cultural significance of the castle and thus are not considered to be key views.
- 8.3.4 Views east from the castle towards the route through the hills between Badenoch and Moray would not be affected by the Proposed Development. Views towards Lochindorb Castle are not interrupted as the Proposed Development would be seen variously behind or offset from the castle depending upon the location on the eastern loch shore.

Whether the proposed change would dominate or detract in a way that affects our ability to understand and appreciate the historic asset

- 8.3.5 The defensive location of the castle on an island in a loch set within a wider topographic bowl is key to an understanding and appreciation of the asset. The low moorland hills beyond also contribute to an understanding of the locational context of Lochindorb Castle and use of natural terrain in enhancing its defensibility. The eastern aspect out from the castle overlooking the route along the loch shore also helps us to understand and appreciate strategic control of a route through the hills.

8.3.6 The Proposed Development would not be visible in views towards the road from the castle. The Proposed Development would extend the horizontal spread and increase the visual prominence of wind turbine development visible in views towards the castle from the eastern loch shore. An experience of the views of open moorland hills from the eastern loch shore to Lochindorb Castle contribute to our understanding and appreciation of the defensive location of the castle and use of natural terrain in enhancing its defensibility. Thus, there may be some effect on the current experience of the asset, as the Proposed Development would introduce additional relatively large modern features on the moorland hills. However, the Proposed Development would not diminish the ability to understand and appreciate the location of the castle within a topographic bowl in the landscape, nor would it impede the ability of the viewer to understand its overall defensive advantages. Key views towards the castle from the loch shore, up and down the length of the road, would still be understandable and remain appreciable.

The visual impact of the proposed change relative to the scale of the historic asset or place and its setting

8.3.7 The scale of the castle relative to its setting relates primarily to the loch and topographic bowl in which it is set. The castle is backdropped by the loch and moorland and is not seen against the skyline. The apparent scale of the castle changes as one moves through the landscape, appearing to be larger scale when immediately opposite it on the loch shore and smaller in scale on more distant approaches along the shore road from where it can be difficult to distinguish from the loch shore.

8.3.8 The Proposed Development would be large scale and would backdrop the castle in some views where it would appear as a prominent element of the view. This is demonstrated in Heritage Viewpoint 9 (**Figure 6.68** of the **EIA Report**) where T11, T12 and T13 would backdrop the castle. Moving south along the road T10 and T9 would appear backdropping the castle and further still along the road the turbines would be seen offset from the castle as shown in Heritage Viewpoint 3 (**Figure 6.58d** of the **EIA Report**). The turbines would be seen in a view already occupied to some extent by modern turbine development albeit development of a smaller scale. The Proposed Development would bring turbines closer to the castle but would not significantly alter the prominence of the castle due to their placement beyond the topographic bowl in which the castle is set. While they may alter the experience and appreciation of the monument and form a significant distraction, the castle will remain a prominent feature in the loch and wider landscape.

The visual impact of the proposed change relative to the current place of the historic asset in the landscape

8.3.9 The visual impact will be beyond the loch and topographic bowl in which the castle is located. The Proposed Development will be set within large scale open moorland within a view which already features and accommodates wind turbine development.

The presence, extent, character and scale of the existing built environment within the surroundings of the historic asset or place and how the proposed development compares to this

8.3.10 Built features within the surroundings of the castle comprise Tirriemore croft on the north-west shore of Lochindorb, residential properties at Lochindorb Lodge and Corrycharcle, and the operational turbines of the Tom nan Clach wind farm. Land on the east shore of Lochindorb is enclosed by post and wire fences, and a line of wooden telegraph poles run north to south above the road. The loch shore road is a single-track tarmac road with numerous passing place signs.

8.3.11 The Proposed Development will be located in a view already partially occupied by modern wind farm development. The Proposed Development will be larger in scale and closer to the castle. It will also increase the horizontal spread of turbines visible in views towards the castle from the loch shore when compared to the existing wind farm development.

The magnitude of the proposed change relative to the sensitivity of the setting of an asset

- 8.3.12 The **EIA Report** established that Lochindorb Castle has a high relative sensitivity to changes in its setting. It was concluded in the **EIA Report**, and reiterated above, that the key characteristics of setting relating to the castle's strategic defensive location would be retained. The Proposed Development would, however, be present in a part of a view that is recognised as contributing to the cultural significance of this Scheduled Monument. Views of the Proposed Development may alter the experience of sense of place and relative remoteness of the castle by bringing modern development closer to it. Overall, the magnitude of impact is judged to be medium, which as per the criteria set out in **Table 11.4** of the **EIA Report** is: *'an alteration of an asset's baseline setting that effects the ability to understand, appreciate and experience the contribution that setting makes to the significance of the asset to a degree but whereby the cultural significance of the monument in its current setting remains legible.'*

Assessment of integrity of setting

- 8.3.13 Where a proposed development affects the setting of a Scheduled Monument (as is the case for Lochindorb Castle), paragraph 145 of SPP requires determination of whether the integrity of the setting would be adversely affected.
- 8.3.14 The meaning of 'integrity of setting' is not defined in SPP, the HES Managing Change Guidance document on setting (HES 2020) nor the EIA Handbook (HES & SNH 2018). The need for a definition was discussed in the lead up to the recent Riggill Wind Farm Inquiry resulting in a Statement of Agreed Matters. The following definition was agreed with HES for the purposes of that Inquiry, and is also considered relevant and useful for the Proposed Development:

"Changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will affect the integrity of setting".

- 8.3.15 An assessment of factors of setting that contribute to the cultural significance of Lochindorb Castle is provided in the **EIA Report** and thus not repeated here. A detailed breakdown of the predicted magnitude of impact of the Proposed Development on setting is considered in **paragraph 8.3.12**. It is concluded that while the Proposed Development will have a significant effect on the setting of the monument, the ability to understand the precise defensive location chosen for the castle in relation to the loch, topographic bowl and historic route way along the loch shore would not be lost. The turbines would not significantly alter the prominence of the castle due to their placement beyond the topographic bowl in which the castle is set. While the Proposed Development will alter the experience and appreciation of the monument and may form a distraction, the castle will remain a prominent feature in the loch and wider landscape.
- 8.3.16 Applying the definition of 'integrity' in **paragraph 8.3.14**, it can be concluded that our understanding, appreciation, and experience of the asset would be adequately retained and, as such, the integrity of the setting of Lochindorb Castle would not be affected. There is, therefore, no conflict with *SPP paragraph 145*.

The Highland Council Historic Environment Team Response

- 8.3.17 The THCHET response states that the application does not accord with *Highland Council Policy 57*. *Highland Council Policy 57* does not allow any significant effects on assets of national importance unless they are outweighed by social or economic benefits of national importance. *THC's Supplementary Guidance* on the historic environment (2013) supports the policy on the historic environment and provides a definition of THC's approach to the protection of the historic environment through the planning process by way of a series of Strategic Aims. *Strategic Aim 13* states: *'That scheduled monuments - and their setting - within Highland are protected from harmful developments which may affect their national importance'*. This suggests that it is only those developments which affect national importance that would be contrary to policy. The

Proposed Development would not affect the national importance of either Lochindorb Castle or Alltlaigh farmstead and thus the Proposed Development is not in conflict with *Strategic Aim 13* of the *Highland Historic Environment Strategy*.

- 8.3.18 With further regard to *Highland Historic Environment Strategy*, the THCHET specifically identified that the Proposed Development does not accord with *Strategic Aim 16* which is: ‘*To ensure that the importance of non-designated archaeological sites and landscapes and their settings are understood and wherever possible are protected from harmful developments*’. The EIA Report did not identify any significant effects on non-designated archaeological remains and the potential for uncovering hitherto unknown archaeological remains within the site is considered to be low. It is therefore not clear how or why the Proposed Development is considered not to accord with *Strategic Aim 16*.

8.4. Updated Cumulative Assessment

Baseline

- 8.4.1 Since the preparation of the **EIA Report** an application has been made for a proposed extension to TnC Wind Farm (TnCExt) of seven turbines and associated infrastructure. This changes the cumulative baseline used for assessment.

Effects

- 8.4.2 Cumulative effects arising from the addition of the TnCExt to the cumulative baseline have been considered for those assets where the effect upon setting from the Proposed Development was judged in the EIA report to be of minor level or greater. This is because it is judged that cumulative effects upon the setting of those monuments which would be subject to low level effects (based on the Proposed Development) are unlikely to reach the EIA Regulation significance threshold. The assets considered for cumulative effects are detailed in **Table 8.2**.

Table 8.2 - Summary of Cumulative Effects

Asset Number	Receptor Name	Receptor Sensitivity	Cumulative Impact Magnitude (Adverse unless stated)	Level of Effect
3	Alltlaigh, farmstead 1990m NE of Cnapan a' Choire Odhair Bhig	High	Low	Minor
17	Lochindorb Castle	High	Low	Minor
18	Aitnoch, cairn, hut circle and field system 1400m SSE of	Medium	Low	Minor
20	Dunearn, fort 510m S of	High	Low	Minor
24	Levrattich, cairn 340m W of	Medium	Low	Minor
30	Ardclach Bell Tower	High	Low	Minor

- 8.4.3 The setting of the Alltlaigh farmstead is described in **Section 11.7.7** of the **EIA Report**. The operational development at TnC to the west is currently visible from the monument; the proposed TnCExt would increase the number of turbines to the south, thus increasing the overall proportion of view occupied by turbines. However, visibility of the Tom na Clach extension turbines would be limited, and it is noted that 6.2.15 of *Appendix 10a* of the submitted TnCExt application identified no effect on setting from the extension turbines. The Proposed Development would be closer than both the operational and proposed TnC turbines and would

also increase the proportion of the overall view that would be occupied by a relatively large-scale wind farm development. However, an understanding and appreciation of the monument is largely derived for its intrinsic characteristics and immediately adjacent agricultural land. An understanding of the cultural significance of the monument and its relationship to its agricultural setting would not be diminished. The magnitude of cumulative impact is judged to be low. The level of the cumulative impact would be minor and not significant and is thus unchanged from the impact identified in **Section 11.10.4** of the **EIA Report**.

- 8.4.4 Lochindorb Castle (Asset 17) is located within a topographic bowl in the landscape, and its setting is described in the **EIA Report (Section 11.711-11.7.12)**. The operational turbines of TnC are visible to the west of the castle (refer to **Figures 6.57 – 6.61** and **6.68** of the **EIA Report**) and in some views from the eastern loch shore directly backdrop the castle against the skyline. The proposed TnCExt turbines would increase the spread of turbines to the south of the operational TnC turbines and would also be seen against the skyline backdropping the castle in some views. However, the increased spread resulting from the TnCExt would be within the horizontal spread of the Proposed Development. The scale and location of the proposed TnCExt would mean that it would appear as part of the same development as TnC. In combination with the TnCExt, the Proposed Development would increase the proportion of the overall view that would be occupied by relatively large-scale wind farm development. However, views of these turbines would not affect the observer's ability to understand the relationship between the monument and its position in the landscape. The magnitude of the cumulative impact is judged to be low. The level of the cumulative impact would be minor and not significant and is unchanged from the impact identified in **Section 11.10.5** of the **EIA Report**.
- 8.4.5 The setting of Aitnoch, cairn, hut circle and field system (Asset 18) is described in **Appendix 11.2 (Volume 3)** of the **EIA Report**. The operational development of TnC to the west is currently visible from this asset, and the proposed TnCExt turbines would also be visible. It is noted that 6.2.15 of *Appendix 10a* of the submitted TnCExt application identified no effect on the setting of Aitnoch, cairn, hut circle and field system from the extension turbines. The Proposed Development would increase the proportion of the overall view that would be occupied by relatively large-scale wind farm development but would not affect the observer's ability to understand the relationship between the monument and its position in the landscape. The magnitude of cumulative impact is judged to be low. The level of cumulative effect would be minor and not significant and is unchanged from the impact identified in **Section 11.10.6** of the **EIA Report**.
- 8.4.6 The setting of Dunearn hill fort (Asset 20) is described in **Appendix 11.2 (Volume 3)** of the **EIA Report**. The operational turbines of TnC are visible to the south-west (refer to **Figure 6.66**) and those of the TnCExt would also be seen in this view. To the north-east and east, the turbines of Hill of Glaschyle, Berry Burn and Paul's Hill I and II are visible. The Proposed Development would increase the proportion of the overall view that would be occupied by relatively large-scale wind farm development. However, these developments would be located beyond the land that would have been locally controlled and defended by the fort, and would not affect the observer's ability to understand the relationship between the monument and its position in the landscape. The magnitude of cumulative impact is judged to be low. The level of cumulative effect would be minor and not significant and is unchanged from the impact identified in **Section 11.10.7** of the **EIA Report**.
- 8.4.7 The setting of Levrattich, cairn 340m W of (Asset 24) is described in **Appendix 11.2 (Volume 3)** of the **EIA Report**. The proposed TnCExt turbines would not be visible from this asset and thus the change to the cumulative baseline would not affect the cumulative assessment for this asset. The level of cumulative effect would be minor and is unchanged from the impact identified in **Section 11.10.8** of the **EIA Report**.

- 8.4.8 The setting of Ardclach Tower (Asset 30) is described in **Appendix 11.2 (Volume 3)** of the **EIA Report**. The operational turbines of Moy and Tom nan Clach (refer to **Figure 6.67**), to the south-west, and Hill of Glaschyle, Berry Burn and Paul's Hill I and II to the east are currently visible. The proposed TnCExt turbines and those of the Proposed Development would be visible in views south-west from the tower and would increase the proportion of the overall view that would be occupied by relatively large-scale wind farm development. However, the Proposed Development and TnCExt would be located beyond the local landscape over which the tower was designed to overlook and influence. The ability to understand, appreciate and experience the relationship between the monument and its position in the landscape would not be diminished. The magnitude of cumulative impact is judged to be low. The level of cumulative effect would be minor and not significant and is unchanged from the impact identified in **Section 11.10.9** of the **EIA Report**.

Mitigation

- 8.4.9 The possibility of cumulative effects as a consequence of the addition of the TnCExt to the cumulative baseline has been considered and assessed. No significant cumulative effects have been identified and thus no mitigation for cumulative effects is required.

Residual Effects

- 8.4.10 As no mitigation measures are proposed to reduce cumulative setting effects on designated cultural heritage assets, the predicted residual impacts on the settings of designated heritage assets will be the same as presented in **Table 8.2**.

8.5. Summary

- 8.5.1 This FEI chapter updates the cultural heritage assessment within the EIA Report, taking into consideration the responses from consultees and the updated cumulative baseline. This update has not altered the overall conclusions of the EIA Report. **Moderate** and significant effects have been predicted upon the settings of Alltlaigh (Asset 3), Lochindorb Castle (Asset 17) and Dunearn hill fort (Asset 20). No other significant effects are predicted.

9. Traffic and Transport

9.1. Introduction

9.1.1 This chapter reviews the responses relating to transport and access matters for the Proposed Development. This section is supported by details located in **Appendix A9.1**.

9.2. Consultee Feedback and Applicant Response

9.2.1 Responses on transport and access matters were received from The Highland Council, Transport Scotland and two members of the public and are summarised in **Table 9.1** below along with the Applicant's response.

Table 9.9.1 - Summary of Consultation Feedback and Applicant Response

Comment	Applicant's Response
The Highland Council – 15 March 2022	
No objection subject to planning conditions	Noted. This is discussed further within Section 9.4 below of this FEI Report.
Transport Scotland – 03 March 2022	
No objection subject to planning conditions	Proposed conditions noted and agreed by the Applicant.
Representations from Public	
Driver distraction concerns on the B9007	Noted. This is discussed further within Section 9.5 below of this FEI Report.
Construction traffic passing through Ferness	The developer is happy to advise that no construction traffic will pass through Ferness and this will be included in the Construction Traffic Management Plan (CTMP).

9.3. Updated Cumulative Assessment

9.3.1 THC has requested that a cumulative assessment be undertaken should the proposed development be constructed at the same time as the proposed Tom na Clach Wind Farm Extension.

9.3.2 No cumulative assessment is required as concurrent construction of both sites, that share a common access route from the B9007 cannot occur. This is due to a legal agreement for the access that permits only one site to be built at a time. The assessment undertaken therefore represents the worst case scenario.

9.4. THC Proposed Planning Conditions

9.4.1 A review of the proposed planning conditions has been undertaken and the developer is meeting with THC officials to discuss the proposed changes outlined in **Appendix A9.1**. These changes are required as the proposed conditions are unacceptable in their current form as they diverge from the current assessment and make unreasonable or impractical requests.

9.5. Driver Distraction

9.5.1 Driver distraction is not considered a major concern at this site and a study on it was not requested by THC. In research (Milloy *et.al.*, 2011), it was noted that:

“A 500-meter-long row of wind turbines was animated to show differential responses to a virtual wind along a six-lane freeway that approximated a roadway

southeast of Toronto. Perception response time, speed maintenance, and lane keeping were measured in the presence of each potential distraction and during corresponding baseline segments. In the wind turbine study, perception response time (PRT) to a lead vehicle that braked hard was not significantly different between baseline and wind turbine conditions. While passing the wind farms, drivers adopted slower speeds than without their presence.”

- 9.5.2 Further research published in observed effects in Europe on potential driver distraction (De Ceunynck *et.al.*, 2017) noted that:

“...it can be concluded that, based on the observed variables, no substantial negative effects for road safety were found in the present study.”

- 9.5.3 Whilst noted that further study would be recommended, it does note that there were no appreciable effects of driver distraction on road safety.

- 9.5.4 Further research has not identified any credible scientific study that suggests that driver distraction occurs from the placement of turbines. As such, no further assessment or detail is proposed.

9.6. Summary

- 9.6.1 This FEI chapter provides a response to matters raised by consultees and members of the public relating to traffic and transport. This section has not altered the overall conclusions of the **EIA Report**, which is no significant residual effects.

10. Socio-Economics, Tourism and Recreation

10.1. Introduction

10.1.1 This section provides an updated assessment of potential cumulative social-economic, recreational effects relevant to the Proposed Development. It also includes information and responses to matters raised in relation to socio-economics, tourism and recreation. For all other information refer to **Chapter 13** of the **EIA Report**.

10.2. Consultee Feedback, and Applicant Response

10.2.1 Responses on socio-economic, tourism and recreation matters were received from a number of community councils and the public and are summarised in **Table 10.1** below along with the Applicant's response. None of the comments received require further environmental information since they related to matters already addressed in the EIA, as summarised below.

Table 10.1 - Summary of Consultation Feedback and Applicant Response

Comment	Applicant's Response
Representations from Public	
Dava Moor Residents Association suggests that the tourism and recreation assessment does not list Lochindorb.	The socio-economic, tourism and recreation assessment in the EIA included an assessment of local tourism assets. Lochindorb was considered given its recreational use (the effects are assessed as minor), although Lochindorb Castle was not. The Castle cannot reasonably be considered to be a tourist attraction – there are no visitor facilities and no access across the water to the island that the Castle is on. The cultural heritage chapter rather than the socio-economic, tourism and recreation chapter is therefore the appropriate assessment in the EIA to consider the Castle.
Some representations from Objectors make reference to the potential of the Proposed Development to have adverse effects on the local tourism sector, as do Finnerne and Grantown-on-Spey Community Councils.	The socio-economic, tourism and recreation assessment in the EIA considered the potential for the Proposed Development to impact on tourism, including both a review of the research evidence and assessment of the specific local tourism assets, accommodation providers and routes. This found no reason to expect adverse effects, noting that research finds no evidence of such effects in other areas of Scotland where wind farms have been developed.
Some representations in Support of the Proposed Development make reference to benefits to the local economy, including potential economic opportunities for local businesses and the opportunity for economic growth based on renewable energy.	The benefits to the local and Scottish economies was considered in the socio-economic, tourism and recreation assessment in the EIA.
Inverness Chamber of Commerce and a local business Support the Proposed Development, highlighting the actions taken by the Applicant to date to engage with potential local suppliers and the economic benefits arising.	The Applicant has committed to engagement with local suppliers and representative bodies (such as Chambers of Commerce) to make sure that they are aware of the opportunities associated with contracts, and are prepared to tender.
Some representations in Support of the Proposed Development make reference to community benefits, including proposed fuel poverty and energy efficiency initiatives.	The proposed approach to community benefits and the associated local economic and social benefits were considered in the socio-economic, tourism and recreation assessment in the EIA.

Comment	Applicant's Response
Representations from Public	
<p>A representation in Support from Nairn Arts and Book Festival provides an example of support received from the Applicant for a cultural event that brings local and regional economic benefits.</p>	<p>The Applicant has committed to providing community benefits for the local area based on £5,000 per MW per year during the 35-year operational lifetime of the Proposed Development and has been in discussions with the local community about how this funding could address local priorities. This is expected include addressing fuel poverty a particular concern in the local area.</p>

10.3. Updated Cumulative Assessment

- 10.3.1 The summary of potential the economy and employment at THC level is reported as negligible/minor beneficial and not significant for both TnCExt and the Proposed Development.
- 10.3.2 There may be beneficial cumulative effects on socio-economics if the Proposed Development supports the development of a local supply chain, which other wind farm developments in the area may benefit from. This would benefit local businesses and increase the economic impact in Highland and Moray. Effects could range from minor to moderate and significant in EIA terms on the local and Highland wide economies.
- 10.3.3 TnCExt EIA Report notes (Chapter 6) minor and not significant effects on potential tourism receptors with the exception of Lochindorb, although later notes that any cumulative effects are considered within the landscape and visual assessment (Chapter 9) as effects arise from a visual impact. There are not expected to be any significant effects on tourism and recreation assets from the Proposed Development, with effects on Lochindorb addressed within the cultural heritage assessment for reasons noted in **Table 10.1** above. Therefore, it is not expected that there would be any significant cumulative effects on tourism and recreation.

10.4. Summary

- 10.4.1 This FEI chapter updates the socio-economic, tourism and recreation assessment within the EIA Report, taking into consideration the responses and the updated cumulative impact assessment. This update has not altered the overall conclusions of the EIA Report, which is no significant residual effects on socio-economic, tourism and recreation assets, with the exception of a moderate and significant effect on the fuel poverty reduction in the local area of the Proposed Development.

11. Aviation and Radar

11.1. Introduction

11.1.1 This section covers updates to the aviation technical assessment and addresses the additional responses to the application in relation to this area. It also considers changes to the cumulative baseline as a result of the submission of TnCExt. For all other information refer to **Chapter 14** of the **EIA Report**.

11.2. Consultee Feedback and Applicant Response

11.2.1 **Table 11.1** below details the responses by aviation stakeholders to the Proposed Development application.

Table 11.1 - Summary of Consultation Feedback and Applicant Response

Comment	Applicant's Response
Highland and Islands Airports - 04 February 2022	
Holding objection. Asks if an IFP assessment, including ATCSMAC, has been conducted and requests to review it. Also asks to see a copy of the Line of Sight Assessment.	Evidence supplied by the Applicant to show that the Proposed Development would not infringe the safeguarding criteria for Inverness Airport.
Highland and Islands Airports – 14 March 2022	
Objection removed. With reference to the above, following evidence supplied by the Developer it is HIAL's opinion that this development would not infringe the safeguarding criteria for Inverness Airport. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted. No response required.
Ministry of Defence – 01 February 2022	
Subject to the conditions the MOD has no objection to the Proposed Development.	Proposed conditions noted and agreed by the Applicant.
NATS Safeguarding - 17 January 2022	
No safeguarding objection to the proposal.	Noted. No response required

11.2.2 There is no change in the position or responses from the CAA, the Scottish Air Ambulance Service and Police Scotland, no objection with no further actions required.

11.3. Updated Cumulative Assessment

11.3.1 There is no change in the cumulative impacts as a result of additional submissions in the area, specifically the TnC Ext application that was submitted in March 2022.

11.4. Summary

11.4.1 This update has not altered the overall conclusions of the EIA Report, which is no impacts are anticipated to any key radar or to Radio stations or Navigational Aids.

11.4.2 As structures over 150 m high there is a statutory requirement for aviation lighting on the Proposed Development. Proposed lighting has been agreed with the CAA and MOD, but will need final approval again with the CAA, prior to construction.

11.4.3 There are no residual effects.

12. Other Issues

12.1.1 This section covers cumulative updates to the land use and telecommunication assessments undertaken within **Chapter 15** of the **EIA Report** and addresses any responses to the application in relation to this area. For all other information refer to **Chapter 15** of the **EIA Report**.

12.2. Land Use

12.2.1 There were no consultation responses that raised matters specifically in relation to land use.

Updated Cumulative Assessment

12.2.2 Both the Proposed Development and TnCEst schemes found a not significant negligible effect of and use changes as a result of the development which in combination would not result in a significant effect on land use.

12.3. Telecommunications

12.3.1 **Table 12.1** below details the responses by aviation stakeholders to the Proposed Development application.

Table 12.1 - Summary of Consultation Feedback and Applicant Response

Comment	Applicant's Response
BT – 14 January 2022 The Proposed Development indicated using the coordinates provided should not cause interference to BT's current and presently planned radio network	Noted. No response required
Joint Radio Company – 11 & 13 January 2022 This proposal is cleared with respect to radio link infrastructure operated by: Scottish Hydro (Scottish & Southern Energy) and Scotia Gas Networks, Scottish Power and Scotia Gas Networks	Noted. No response required

Updated Cumulative Assessment

12.3.2 As neither the Proposed Development nor TnCEst will impact any telecommunication links, the Proposed Development will not have any cumulative effects on telecommunication links in combination with any other developments.

12.4. Summary

12.4.1 This FEI chapter updates the land use and telecommunication assessment within **Chapter 15** of the **EIA Report**, taking into consideration the responses and the updated cumulative impact assessment. This update has not altered the overall conclusions of the EIA Report, which is no significant residual effects on land use of telecommunication assets.

13. Summary and Conclusions

- 13.1.1 This FEI Report provides an update to the cumulative baseline and addresses comments received in response to the application. There are no changes to the effects identified within the main EIA Report
- 13.1.2 Overall, the Proposed Development is an appropriately designed, and sensibly located wind farm which is in line with policies in the local and strategic development plans and conforms to national policy. The Proposed Development has been designed to maximise energy production from an existing wind farm landscape, within acceptable environmental limits. The Proposed Development will provide a valuable contribution towards the ambitious national targets for electricity generation from renewable sources and contribute towards sustainable economic growth the highlands and Scotland as a whole.

14. References

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