Non-Technical Summary

Ben Sca Redesign Wind Farm

Ben Sca Wind Farm Limited

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1.0 Introduction

This Non-Technical Summary (NTS) summarises the Environmental Impact Assessment (EIA) Report for the Ben Sca Redesign Wind Farm referred to as the 'Proposed Development'.

The Applicant is Ben Sca Wind Farm Limited, a subsidiary of EDP Renewables (EDPR). The Proposed Development is being developed by Wind2 Ltd (Wind2) on behalf of EDP Renewables (EDPR). The Applicant proposes to install and operate up to nine wind turbines with associated infrastructure on land approximately 2.5km to the southwest of Edinbane and approximately 7km to the east of Dunvegan on the Isle of Skye (the site). The site application boundary is shown on **Figure 1**.

The Applicant was previously granted planning permission by the Highland Council (THC) on the same site for:

- Ben Sca Wind Farm (reference 20/00013/FUL) in December 2020. The approved development is for the construction and operation of up to seven wind turbines with a maximum blade tip height of up to 135m and associated infrastructure; and
- Ben Sca Wind Farm Extension (reference (21/05767/FUL) in April 2022. The approved development is for the construction and operation of two wind turbines with a maximum blade tip height of up to 149.9m and associated infrastructure.

For the purposes of this EIA Report, the consented Ben Sca Wind Farm and Ben Sca Wind Farm Extension is referred to as the 'consented development'.

The Proposed Development would replace the consented development, wholly within the same application site area, and would aim to:

- maximise the renewable energy output from the site;
- maximise the secured grid capacity contributing further to Scottish Government net-zero emission targets[1];
- ensure that the candidate turbine can be sourced and installed; and
- reduce the distance to the connection point to the national electricity grid network, following a change dictated by Scottish & Southern Electricity Networks (SSEN) (connection point changed from Dunvegan Grid Supply Point (GSP) to Edinbane GSP).

As with the consented development, access to the Proposed Development would utilise the existing site entrance from the A850 and existing section of access track for the operational Ben Aketil Wind Farm.

The site boundary includes forestry in the northwest which is consented to be used for peatland restoration and habitat enhancement as part of the consented Habitat Management Plans (HMPs) for the consented development. It is proposed that this area of peatland restoration is expanded as part of the Proposed Development to include the felling of further areas experiencing poor tree growth to enhance the area of bog habitats to be restored to meet the objectives of National Planning Framework 4 (NPF4).

[1] Net zero emissions of all greenhouse gases by 2045 ('Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update')

The Proposed Development would be located within The Highland Council (THC) area (within Skeabost & District Community Council Area) centred on National Grid Reference (NGR) 132800, 848600. It is being progressed with a community shared ownership opportunity for communities on the Isle of Skye, being offered up to a 5% share of the project. Discussions have progressed with representative community groups on Skye.

The Proposed Development would have a capacity of up to 40.8MW and produce approximately 145,000 Mega Watt hours (MWh) of electricity annually (20,000MWh more than the consented development). This equates to the power consumed by approximately 45,000 average UK households (6,500 more homes than the consented development), which would be well above the energy requirements of the 13,143 homes on the Isle of Skye[2], and provides a meaningful contribution to the Scottish Government's target of 20 Giga Watt (GW) installed capacity from onshore wind by 2030.

Since the generating capacity of the Proposed Development would exceed 20MW, but be no greater than 50MW, an application is being submitted for planning permission for a major development (as classed under The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009) under the Town and County Planning (Scotland) Act 1997 (as amended).

Environmental effects of the Proposed Development have been considered as part of an iterative design process and included within the Environmental Impact Assessment (EIA). The results of the EIA are presented within the EIA Report and summarised in this NTS. The EIA Report informs readers of the nature of the Proposed Development, likely significant environmental effects and measures proposed to protect the environment, during site preparation, construction, and the operation of the Proposed Development.

Assessments as reported in this EIA Report have been informed by work undertaken as part of the EIA process.

This EIA Report presents the findings of the EIA process by describing the Proposed Development, the current conditions at the site and the likely impacts which may result from the Proposed Development. Where appropriate, mitigation is proposed, and any residual impacts are reported.

2.0 The Proposed Development

2.1 Proposed Infrastructure (EIA Report Chapter 1)

The Proposed Development is described in detail in **Chapter 1 (Introduction and Project Description)** of the EIA Report. An outline Construction and Environmental Management Plan (CEMP) is contained in the EIA Report as **Technical Appendix 1.1**. The key components of the Proposed Development (as shown on **Figure 2**) which would be constructed in accordance with the Construction (Design and Management) Regulations 2015 including detailed design and relevant Health and Safety requirements, comprise the following:

- nine variable pitch (three bladed) wind turbines, each with a maximum blade tip height of up to 149.9m and rotor diameter of up to 138m;

[2] Taken from estimated 2017 data, source: Skye and Lochalsh Population and demography, Paper 1 of a population needs assessment for Skye and Lochalsh NHS Highland April 2019.

- turbine foundations and a crane hardstanding area which includes areas for blade, tower and nacelle storage at each wind turbine;
- up to 4.5km of new onsite access track and associated drainage with a typical 5m running width (wider on bends) and two turning heads;
- underground cabling along access tracks to connect the turbine locations, and the onsite electrical substation;
- one onsite substation which would accommodate 33KV switchgear to collect electricity from the site. The substation compound would include a control and metering building;
- up to three borrow pits;
- two construction compounds; and
- clearance of up to 64.73ha of conifer forest for Habitat Management purposes as described in **Technical Appendix 5.3: Outline Habitat Management Plan (HMP).**

It is proposed that the total installed capacity would be up to 40.8MW.

2.2 Consented Development and Proposed Changes

The Proposed Development is an amendment to the consented development, which comprises the consented Ben Sca Wind Farm (20/00013/FUL) and consented Ben Sca Wind Farm Extension (21/05767/FUL). The changes to the consented development are as follows:

- increase blade tip height for seven turbines by up to 14.9m (from 135m to 149.9m);
- increase the rotor size for all nine turbines by up to 23m (from 115m to 138m);
- increase spacing, minor adjustment to turbine locations, maximum up to 132m movement from consented positions (Ben Sca Extension turbines remain in same locations as consented) with associated adjustments to the access tracks and crane hardstanding to accommodate the new locations;
- re-location of the onsite substation to the southern area of the site;
- addition of second temporary construction compound adjacent to Ben Aketil Wind Farm track;
- increase of net generation capacity from consented 37.8MW to up to 40.8MW to maximise use of the available grid connection (MWh); and
- increase operational life from 30 years to 40 years.

2.3 Outline Habitat Management Plan (Technical Appendix 5.3)

An Outline Habitat Management Plan (HMP) is provided in **Technical Appendix 5.3**. It is anticipated that the document would be developed following the granting of planning permission in discussion with THC, Scottish Environment Protection Agency (SEPA) and NatureScot. The aim of the Outline HMP is to establish the key objectives and principles by which parts of the site would be restored and managed to the benefit of biodiversity, which would then form the basis for the more detailed HMP. The Outline HMP is intended to cover the restoration, management and monitoring of peatland and ornithological habitats during the operational life of the wind farm.

The broad principal aim of the Outline HMP is to restore and manage c. 64.73ha of peatland habitat within the afforested area to the northwest of the site as well as provide ornithological monitoring for key bird species including eagles.

The following measures and specific objectives are proposed within the habitat restoration area:

- to fell trees within a 64.73ha area of conifer plantation within the site, and maintain the area free of trees;
- to increase the water table across the peatland restoration area, through ditch blocking and surface smoothing, in order to restore the underlying processes suitable for blanket bog restoration;
- to create conditions that should, in time, increase the abundance and distribution of bog plants, particularly peat forming *Sphagnum* mosses, and facilitate its recovery back to blanket bog habitat;
- to maintain the peatland restoration area free of trees/ conifer regeneration;
- to control threats to regenerating bog/ heath habitats such as grazing and fire;
- to monitor bog/ heath regeneration to assess if the necessary conditions have been created that should, in time, increase the abundance and distribution of bog plants, particularly peat forming *Sphagnum* mosses, and facilitate its recovery back to active peatland habitat; and
- to facilitate the monitoring and evaluation process by identifying areas of reference habitats within/ adjacent to the peatland restoration area against which regeneration progress can be measured and collecting baseline data within these and the proposed restoration locations.

3.0 Benefits of the Proposed Development

3.1 Contribution Towards Government Targets

The Proposed Development would:

- make a meaningful contribution of 40.8MW towards meeting the Scottish Government's renewable energy generation targets for a minimum installed capacity of 20GW of onshore wind by 2030 which is particularly relevant given that it is anticipated that this project would connect into the grid before 2030;
- maximise the renewable energy yield of the site, to reach an estimated annual output of 145,000MWh (increasing the output from the consented development by approximately 16% and 20,000MWh each year);
- make a valuable contribution towards UK generation targets and the reduction in emissions of greenhouse gases, principally carbon dioxide (CO_2), in becoming carbon neutral in 1.8 years as demonstrated by the carbon calculator, offsetting approximately 2.46 tonnes of CO_2 over the lifetime; and
- make Scotland, and therefore the UK, less reliant on imported and price-volatile fossil fuels by generating the equivalent energy to supply the approximate domestic needs of 45,000 average UK households (approximately 6,500 more UK homes powered than the consented development).

3.2 Proposed Community Shared Ownership

The Proposed Development is being brought forward with the opportunity for community shared ownership. The preferred model for shared ownership in the project is through revenue (profit) sharing. Discussions have progressed with representative community groups on Skye, specifically regarding the opportunity for the communities investing in the consented development. It is proposed that the community shared ownership opportunity which is developed for the consented development will apply to the Proposed Development. Further details of the consultation effort associated with and response from communities is provided in the **PAC Report** accompanying the application. Discussion relating to the shared ownership offering is also provided in the **Planning, Sustainable Design and Access Statement**.

3.3 Proposed Community Benefit

In addition to the shared ownership opportunity, should the Proposed Development gain consent, a Community Benefit Fund would be made available to the community of interest. It is estimated that, depending on the type of investment selected, the community benefit fund alone would accrue benefits to the local economy of approximately £8.16 million over the 40 year operational life of the wind farm; which is £2.49 million greater than for the consented development.

3.4 Reducing the Cost of Electricity

Consultation with the local community has highlighted concern over the relatively high cost of electricity on Skye, despite several wind farms now in operation. The Applicant is proposing to offer, as part of its Community Benefit package, a contribution to electricity bills to residents within a distance of the turbines to be agreed in consultation with the communities, over the 40 year life of the wind farm. Part of this offer also looks to entice properties and communities to increase their energy efficiency and reduce their carbon emissions by offering a capitalised lump sum to enable this.

3.5 Other Economic Benefits

During the construction phase, the Proposed Development is expected to provide up to 32 jobs of additional temporary employment locally. During the operational phase, the Proposed Development is expected to create between three and four permanent locally based direct jobs, between seven and nine indirect jobs in the operational and maintenance supply chain locally, and a total of between 10 and 13 jobs created in the THC area.

The Applicant is committed to employing good practice measures with regard to maximising local procurement such as those set out in the Renewables UK Good Practice Guidance 2014: ‘Local Supply Chain Opportunities in Onshore Wind’ (RenewablesUK, 2014). The Applicant would also build on recent UK best practice in innovative local procurement including the implementation of a Local Contractor Policy, where additional weight is given in the tendering process to primary contractors that show a clear commitment to increasing local content in their supply chains. An auditing process would also be conducted so that the amount of local content sourced during the construction phase is recorded and fed back to the local business community.

As part of its Local Contractor Policy, the Applicant intends to establish a presence on Skye long before construction starts so that local suppliers are aware of opportunities. A number

of ‘Meet the Supplier’ events would be organised well in advance of the main tender process commencing to ensure that local businesses are aware of opportunities to bid for contracts.

The Scottish economy would be expected to be boosted by a total of £2.4 million during the 18 month development, construction and commissioning period. This is considered to be a positive benefit of the Proposed Development.

At this stage in the development process, it is not possible to quantify economic benefits in respect of individual supply chain companies, as contracts would not be let until consent is granted. However, it is evident from recent wind farm construction experience in Scotland (including BVGA report on economic benefits (BVG Associates, 2017) that suppliers of a wide range of goods and services within the Highland region and Scotland as a whole would obtain benefit from the Proposed Development. The 2023 annual Supply Chain Impact Statement by Scottish Renewables has revealed that 89% of Scotland’s renewable energy supply chain believe renewable energy is the biggest economic opportunity facing Scotland, 83% having recruited new employees as a result of opportunities in the renewable energy industry.

4.0 Environmental Impact Assessment

4.1 Landscape and Visual (EIA Report Chapter 3)

4.1.1 Baseline

The site is located on hilly ground between the settlements of Edinbane and Dunvegan in the northwest of Skye. The site is mainly covered by upload sloping moorland, apart from in the north where there is some forestry, extending to the A850 main road. The site forms part of the hill backcloth that surrounds the lower-lying, coastal and settled landscapes to the north, west and south. In contrast, to the east of the site, forestry and moorland covered hills can be found, which form the interior of the landscape of Skye.

The site is located in an area with a number of existing and consented wind farms in close proximity and is the subject of ongoing development interest with a number of larger wind farm proposals at various stages of the consenting process. The existing wind farms at Ben Aketil and Edinbane are respectively located immediately to the southwest and around 1km to the east of the site and the approved Glen Ullinish Wind Farm will be located around 5km to the southeast.

Computer generated Zones of Theoretical Visibility (ZTVs) identify the landscape and visual receptors within the study area which would have potential visibility of the Proposed Development. These are identified to be the same as for the consented development since the ZTV for both developments is comparable with minimal differences.

There are no landscape designations within the site, but the Proposed Development would be visible from some designated areas, including National Scenic Areas (NSAs), Special Landscape Areas (SLAs) and Wild Land Areas (WLAs). It is however noted that in line with NPF4, WLAs were scoped out of assessment due to their distance from the site and absence of significant effects identified for the consented development.

Key visual receptors (people) in the landscape surrounding the site comprise the residents of settlements and dispersed properties, road users, people walking through the landscape (using footpaths, Core Paths and visiting summits) and recreational visitors to attractions in the surrounding area.

4.1.2 Assessment

The Landscape and Visual Impact Assessment (LVIA) has been undertaken following the Guidelines for Landscape and Visual Impact Assessment (GLVIA)[3] produced by the Landscape Institute and Institute of Environmental Management and Assessment (2013). The LVIA has assessed the predicted effects of the Proposed Development upon landscape character, visual amenity and areas of recognised landscape value.

The LVIA has focused upon a detailed study area of 20km which is considered sufficient to identify all potentially significant effects arising from the Proposed Development.

A more detailed study area has been used for Residential Visual Amenity Assessment (RVAA), which includes all properties considered within the previous RVAAs for the consented development (i.e. homes within approximately 3.5km of the proposed turbines).

The cumulative LVIA considers the Proposed Development in combination with operational and consented wind development, repowering/replacement schemes, the proposed Balmeanach Wind Farm and the proposed Waternish Wind Farm.

Mitigation in relation to landscape and visual effects was embedded in the design of the consented development and remains relevant to the Proposed Development as follows:

- consideration of the scale and number of turbines proposed, both in isolation and cumulatively with existing wind farms in the area;
- the potential landscape and visual effects resulting from the Proposed Development have been considered extensively from key receptors, to ensure that the linear composition of the turbine array is maintained;
- utilising existing access tracks where possible to reduce the extent of new development;
- reinstatement of temporary construction areas;
- siting the substation to limit potential visibility; and
- selection of internal wind turbine transformers.

4.1.3 Predicted Landscape Effects

There would be no significant effects arising from the Proposed Development. This arises as a result of the relatively low sensitivity of the host character type (LCT 359 Upland Sloping Moorland) and the existing influence on nearby Edinbane and Ben Aketil Wind Farms on the host character type and landscape character in the surrounding area.

The most notable effects would be moderate and adverse effects on LCT357 Farmed and Settled Lowlands (Greshornish) located approximately 4km to the north of the site, and moderate/minor and adverse effects on the host LCT, LCT 360 Stepped Moorland (Loch Snizort Beag to Loch Greshornish) and LCT357 Farmed and Settled Lowlands (Edinbane and Kildonan), both within 3km to the northeast of the proposed turbines.

[3] Landscape Institute and Institute of Environmental Management and Assessment (IEMA) (2013) Guidelines for Landscape and Visual Impact Assessment GLVIA. 3rd Edition. Abingdon, Routledge.

4.1.4 Predicted Visual Effects

As with effects on landscape character, changes to views would be moderated by the existing presence of operational wind farms. Effects would be greatest to the northeast as Ben Aketil Wind Farm is mostly screened by terrain in views from this direction and the Proposed Development spans across the elevated skyline in views from lower lying settlements and roads.

Significant (major/moderate and adverse) effects on views would arise for visual receptors at Edinbane, Kildonan and Flashader. People living in and visiting these small settlements within 6km to the northeast of the site would have relatively open views of the Proposed Development, particularly from Upper Edinbane.

Effects on other visual receptors would be moderate at most – at Greshornish, Dunvegan, settlement around Loch Bracadale between Gearymore and Roag and for users of the A850.

4.1.5 Predicted Effects on Designated Landscapes

The Proposed Development is not sited within a designated landscape. The assessment has identified that there would be negligible and not significant landscape and visual effects on Trotternish NSA and Trotternish and Tianavaig SLA. Adverse effects on North West Skye SLA would be minimal and not significant and would not differ from those of the consented development.

The only locally designated landscape which would be affected by the Proposed Development would be the Greshornish SLA, where views of the proposed turbines alongside Ben Aketil and Edinbane Wind Farms would give rise to moderate, adverse and not significant effects as a result of small changes to the special qualities of ‘Historic landscape’ and ‘Contrasting geology, enclosure and exposure’. These changes would not affect the integrity of the SLA.

4.1.6 Cumulative Effects

In general, the effects of adding the Proposed Development to the schemes included in each of the cumulative scenarios would remain much the same as for the Proposed Development in addition to the baseline, the only changes to significant effects would be that effects on visual receptors at Kildonan and Flashader would reduce to become not significant in the context of a consent for Ben Aketil Repowering Wind Farm or Edinbane Repowering Wind Farm (or both).

4.1.7 Residential Visual Amenity (Technical Appendix 3.4)

Properties at Upper Edinbane (south and central), Upperglen and Coishletter Lodge have been considered in detail. Except for effects at Upperglen, effects on the homes considered would be lower than large magnitude.

Effects at Upperglen would be of large magnitude and as such requires consideration of whether the effects would trigger the Residential Visual Amenity (RVA) threshold. However, effects on this property would be unchanged from the consented development, as the blade tip heights and positions of turbines 8 and 9 (which are closest to the property) would remain unchanged, and effects would not exceed the RVA threshold.

The assessment concludes that in no case would effects be of such nature and / or magnitude that it potentially affects living conditions at any property to the point it becomes an unattractive place to live, when judged objectively in the public interest.

4.2 Ornithology (EIA Report Chapter 4)

4.2.1 Baseline Studies

There are no statutory sites designated for their bird interest within 10km of the site boundary. The closest site is the Cullins SPA approximately 15.4km south of the Proposed Development. The Cuillins SPA supports a breeding population of European importance of the Annex I species, golden eagle.

Surveys undertaken from January to December 2023 were conducted in accordance with the relevant NatureScot guidance (SNH, 2017[4]). The following field studies were undertaken:

- Vantage Point (VP) Surveys from three locations;
- Breeding Wader Surveys from April to July 2023 within a 500m buffer from the Proposed Development area; and
- Breeding Raptor Surveys within a 2km buffer of the turbine locations.

These surveys supplemented and updated ornithological data collected on the site for the consented development in 2018/19 and 2021.

4.2.2 Predicted Effects

Following the field surveys, impacts on the following target bird species were assessed: white-tailed eagle; golden eagle; hen harrier; and golden plover.

All other species recorded are either relatively common or widespread and/or were recorded only infrequently/in small numbers and are therefore not considered important at the site.

Following the implementation of a range of good practice measures, no significant adverse effects on any of species assessed (i.e. white-tailed eagle, golden eagle, hen harrier and golden plover) are predicted during the construction phase of the Proposed Development.

During the operational phase no significant disturbance/displacement or barrier effects were identified. Collision risk mortality is predicted to effect white-tailed eagle (low), golden eagle (negligible) and golden plover (negligible), but the predicted mortality for these species is not considered significant. The population modelling undertaken shows that for white-tailed eagle the population will still reach it's carrying capacity within the region.

During decommissioning, as during construction, potential displacement effects are possible, but a basic monitoring programme for breeding waders and raptors would inform any potential impacts and following the implementation of a range of accepted good practice measures no significant adverse effects are predicted.

4.2.3 Cumulative Effects

An assessment of the potential cumulative effects (potential habitat loss and collision mortality) on white-tailed eagle, golden eagle, hen harrier and golden plover from the Proposed Development along with all other operational, consented and submitted plans or

[4] SNH (2017). Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms. Version 2.

projects within an appropriate zone of influence and against the relevant Natural Heritage Zone (NHZ) population estimates was undertaken.

During construction no significant cumulative effects were considered likely to occur.

During the operational phase no significant effect was identified for golden eagles in terms of habitat loss (by means of disturbance/displacement). Collision risk was considered not significant for golden eagle, hen harrier, and golden plover. Collision risk was considered to have a low-level impact at the regional level for white-tailed eagles, however, this is not considered to be significant.

4.2.4 Further Survey and Monitoring

Despite no significant effects being predicted, it is acknowledged that raptor flight activity and the potential for displacement from the Proposed Development to other adjacent areas and the potential for collision is important in this area of Skye and a bird protection plan (BPP) and monitoring programme is therefore proposed that addresses the species that may be affected by the Proposed Development. This is consistent with the monitoring proposed for the adjacent Balmeanach Wind Farm which is being developed by the same companies as the Proposed Development.

Post consent monitoring (schedule to be agreed with consultees) may include:

- collision monitoring, flight activity surveys and breeding raptor surveys coordinated with the consented Glen Ullinish Wind Farm (and any other wind farms that gain consent in the vicinity);
- reducing carrion availability by removing fallen stock/deer; and
- collaboration with the Highland Raptor Study Group to facilitate a research programme aimed at furthering understanding of white-tailed eagle and golden eagle population prospects in the light of an increasing number of renewable energy projects on the Isle of Skye.

4.3 Ecology (EIA Report Chapter 5)

4.3.1 Baseline Studies

Baseline ecological data was taken from the data search and surveys undertaken for the consented development. Additional baseline surveys undertaken for the Proposed Development included habitat and vegetation surveys (September and October 2023), and surveys of protected mammal species (January 2024).

There are no ecologically designated sites within the site boundary. A Site of Special Scientific Interest (SSSI) and two Special Areas of Conservation lie within 10km of the site however these are designated for their geological interest or for their marine features and are therefore not considered to be ecologically important for the Proposed Development.

Within a 5km radius of the site, one small block of ancient woodland was identified within Edinbane. As this woodland would be unlikely to be affected by the Proposed Development, it was not assessed.

The site mainly comprises blanket bog and wet heath habitats. Part of the site was subject to a fire in spring 2018. This area was found to be mostly recovered when habitat surveys were carried out in 2023, although the area may still be undergoing long term recovery from fire damage.

Small habitats such as flushes and springs were identified as being potentially groundwater dependent but further investigation has concluded that none of the habitats are fed by groundwater and are instead sustained by rainfall and surface water flow.

4.3.2 Predicted Effects

The Proposed Development has been designed to avoid flush habitats, watercourses, areas of deepest peat and sensitive bog habitat as far as possible. However, some loss of blanket bog and heath habitats would be unavoidable and the Proposed Development would result in the direct/indirect loss of 11.16ha of blanket bog and 2.49ha of wet and dry heath habitat. The loss would be compensated for through measures to restore and manage peatland habitat within a c. 64.73ha area of conifer plantation felling, which would be delivered via the HMP. This would be a 26.2ha increase on the habitat management area proposed for the consented development which and result in a significant enhancement when compared with the consented development.

The habitat within the site is not considered to be of particular importance for amphibians. The majority of the site provides suitable habitat for common lizard and could support other reptile species. Good practice mitigation measures would be implemented to prevent the inadvertent injury or killing of individuals, therefore no significant effects are predicted, and no contravention of the relevant legislation is likely.

No otter field signs were recorded within the site during the January 2024 survey; however, the survey did confirm recent otter presence in the wider area, outwith the site boundary. A pre-construction survey for otter would be undertaken. Following implementation of good practice measures no significant effects on otter would be likely to occur.

No signs of pine marten were noted on site during the January 2024 survey for the Proposed Development or during previous mammal surveys for the consented development in 2021, 2019 and 2018; and suitable habitat is limited on site. A pre-construction survey for pine marten would be undertaken.

No previous records or signs of badger were reported or found during the January 2024 survey for the Proposed Development or during surveys to inform the consented development in 2021, 2019 and 2018. The majority of the site offers limited suitability for badger sett building and foraging. Badgers were scoped out of the assessment.

Bat surveys undertaken in 2019 for the consented development recorded only one bat species (common pipistrelle) and identified that bat activity was low at all locations sampled. It was concluded that significant effects upon common pipistrelle were not likely. Given the low risk to bats concluded for the consented development, it was agreed in consultation with NatureScot that additional bat activity surveys were not required to inform the Proposed Deevelopment and have been scoped out of the assessment.

The site supports a relatively small population of deer at low density, with some field signs noted during surveys. No significant adverse effects are predicted upon deer during construction or operation.

A habitat suitability assessment for fish species of conservation importance was conducted in May 2019 and July 2021 to inform the consented development. No effect upon habitat of fish species of conservation concern, including salmonid habitats, was anticipated for the consented development. Impacts on fish have been scoped out of assessment for the Proposed Development given that changes in the suitability of habitat for fish species is unlikely to have significantly changed since previous assessments were undertaken, and on

the basis that mitigation committed to for the consented development is considered inherent to the Proposed Development.

A suitably qualified Environmental Clerk of Works (EnvCoW) would be employed to oversee activity at key points for the duration of the construction and reinstatement periods (at a frequency to be agreed with THC and NatureScot), to ensure natural heritage interests are safeguarded.

4.3.3 Cumulative Effects

No potential significant adverse cumulative effects have been identified.

It is noted that the proposed Peatland Restoration Area for the Proposed Development is situated directly adjacent to the proposed peatland restoration area for the proposed Balmeanach Wind Farm (approximately 77.75ha), which would result in a total area of 142.48ha of peatland restoration, which constitutes a significant positive cumulative benefit due to habitat connectivity.

4.4 Hydrology, Hydrogeology and Soils (EIA Report Chapter 6)

4.4.1 Baseline Studies

There are no statutory designated sites within the site boundary, and the Site of Special Scientific Interest (SSSI) and Geological Conservation Review Site (GCR) to the south of the site are not water dependent. The Inner Hebrides and the Minches Special Area of Conservation (SAC) 3.7km to the north of the site is not considered to be hydrologically connected. Loch Snizort 1.8km to the north of the site is designated as a shellfish waters protected area, and receives runoff water from the site.

The entirety of the site lies within peatland habitat, which are considered nationally important carbon rich soils.

There are 2 major bedrock geological units within the site, both within the Skye Lava Group. The British Geological Society (BGS) have mapped three inferred faults across the site. No development that requires the construction of substantial foundations is proposed near to these inferred faults. The igneous bedrock beneath the site is a low productivity aquifer and is unlikely to contain significant quantities of groundwater. Groundwater in the bedrock underlying the site has a high vulnerability and is therefore vulnerable to pollution.

An assessment of potential Groundwater Dependent Terrestrial Ecosystems (GWDTEs) has been completed, showing that areas mapped as potentially high and moderate GWDTE are not sustained by groundwater but by rainfall and surface runoff. Measures are proposed to safeguard existing water flow paths and maintain existing water quality.

Two main catchments drain the site: the Red Burn draining the northern and western extent of the site, and Abhainn Choishleadar draining the eastern extent of the site. Both watercourses have been classified by the Scottish Environment Protection Agency (SEPA) with an overall status of ‘Good’.

Baseline surveys relating to the water environment, peat and soil depth were undertaken in 2018, 2019 and 2021. Additional peat depth and characterisation surveys were undertaken for the Proposed Development in September 2023 and February 2024.

4.4.2 Predicted Effects

An extensive programme of peat probing has been completed and this has been used to inform the site design. Areas of deepest peat would be avoided. Peat would be managed on site through a Peat Management Plan. Good construction practice and methodologies would be implemented to prevent peat instability.

The Proposed Development infrastructure has been carefully designed to avoid crossing watercourses wherever possible and would be accessed via the existing Ben Aketil access track, which has one existing watercourse crossing.

A drainage ditch, on the western side of the Ben Aketil access track, will also need to be crossed in order to access turbine 9, with the installation of a pipe culvert to maintain downslope run-off and drainage.

Water quality monitoring before and during the construction phase would be undertaken, the monitoring programme agreed with THC, SEPA and Skye and Lochalsh Rivers Trust (SLRT), and is expected to include monitoring watercourses identified as potentially at risk prior to any mitigation techniques or good practice measures.

Mitigation measures have been identified, either through the site design or in accordance with good practice guidance. Good practice measures, which will be included in the CEMP, would be applied in relation to pollution risk, sediment management and management of surface runoff rates and volumes. Examples include maintaining a 50m buffer to watercourses, no direct discharge of water into watercourses and the specification of Sustainable Drainage Systems (SuDS) to limit the rate of runoff from the site and to allow the quality of water to be managed at source prior to any discharge being made.

Following adherence to good practice measures, the potential effect on receptors of high sensitivity would be negligible and therefore not significant.

No potential flood risk was identified to the Proposed Development.

There are no private or licensed water abstractions within or at risk from the site.

4.4.3 Cumulative Effects

A cumulative assessment including other wind developments within the same water catchments has been undertaken. This included Balmeanach, Ben Akil Repowering and Edinbane Repowering Wind Farms. The probability of a pollution or sedimentation event occurring at more than one development at one time is judged to be low. Following good practice measures, which will be included in the CEMP, no significant effects are identified.

The potential increase in peak runoff from each development would be mitigated through the detailed design of the drainage systems at each development. The developments would be managed to ensure there is no increased downstream fluvial flood risk.

It is concluded that there would be a negligible and not significant cumulative effect on hydrological receptors during the construction, operating and decommissioning phases of the Proposed Development.

4.5 Cultural Heritage and Archaeology (EIA Report Chapter 7)

4.5.1 Baseline Studies

The baseline remains unchanged since the surveys undertaken for the consented development in 2019 and 2021:

- There are no prehistoric cultural heritage assets within the site and seven within 1km.
- There are no Romano-British cultural heritage assets within the site and one within 1km.
- There are no cultural heritage assets attributed to the early medieval or medieval periods within the site and three within 1km.
- There are eight post-medieval heritage assets within the site boundary and a further 45 within 1km of the site. There is one asset within 1km of the site dated as Medieval to Post-medieval.
- Within the site there are four undated assets, with a further 86 within 1km of the site.

4.5.2 Predicted Effects

The Proposed Development has the potential for a direct impact on two undated cultural heritage assets of low significance without mitigation. Two further undated cultural heritage assets of low significance may also be impacted and are therefore included in the proposed mitigation as a precaution. The impact would not be significant and appropriate mitigation would be implemented, with fencing installed around the assets during construction.

It was agreed with Historic Environment Scotland and THC that indirect impacts through setting change could be scoped out of assessment as there were no potential significant effects identified on the setting of any asset for the consented development and the ZTV has remained comparable.

4.5.3 Cumulative Effects

No common receptors with other wind farm applications are predicted and since no impacts on monuments is predicted from the Proposed Development, no cumulative effects are predicted.

4.6 Socio-economics and Land Use (EIA Report Chapter 8)

4.6.1 Baseline Studies

Although the largest administrative area in Scotland by geographical area, The Highland Council area's population makes up less than 5% of Scotland's population and the proportion of working age residents (16-64) is lower than the Scotland average and UK average.

The Isle of Skye is a distinctive community within THC area with a high tourism profile due to its iconic landscape quality (particularly the Cuillin mountain range to the southeast of the site and the Trotternish ridge to the northeast of the site), accessibility, cultural references in story and song, and range of accommodation and other tourism services. The site and immediate area within which the Proposed Development would be located is relatively quiet in terms of recreational and tourism activity, although the A850 to the north introduces visitors who are passing through the area, in particular tourists visiting Dunvegan or undertaking a road tour of the island. Communities in the vicinity of the Proposed Development include Edinbane 2.5km to the northeast, the crofting township of Balmeanach which lies 4km to south of the site, Dunvegan 7km to the west and Struan which lies 9km to the south, and there are a number of scattered tourism-based businesses located around the site principally along the A850.

The land use within the site is primarily moorland used for shooting game, with an area of commercial forestry in the northwestern part of the site. There are no formal recreational facilities located within the site itself.

A two-tiered study area was used for the assessment as follows:

- **Wider Study Area (WSA):** a WSA that is intended to encompass the area within which significant effects on employment and the local economy, including the tourism economy, could occur. The WSA is required for certain receptor groups because the majority of the business and labour market effects that could occur would be experienced by population and business centres located across a wide area. The WSA area is primarily set at the area of THC administrative area but effects are also considered within the rest of Scotland and the United Kingdom (UK) where relevant; and
- **Local Area of Influence (LAI):** The LAI forms the focus for assessment of both direct and indirect effects on those land use and tourism receptors that are likely to experience effects at a more local level. The LAI is defined by the application site together with an area extending to 5km from the site boundary. Given the importance of the coastal area as a tourism asset, the LAI extends to 10km for receptors that are within line of sight (identified through the ZTV).

4.6.2 Predicted Effects

The assessment on socio-economics and land use sets out the likely socio-economic effects (investment, employment, additional Gross Value Added (GVA)[5] and contribution to the labour market) as well as recreation and tourism effects, associated with the Proposed Development.

With respect to employment, 32 new jobs are predicted to be generated in the local area during the 18 month construction phase of the Proposed Development. The effect on local employment is considered to be negligible and not significant.

A net additional total of £1.4 million of GVA is predicted to be generated by the Proposed Development in the local area during the development, construction, and commissioning phase which would increase the size of the local economy by around 0.02%. The effect on the value of the local economy is considered to be negligible and not significant.

The Applicant is committed to employing good practice measures with regard to maximising local procurement such as those set out in the Renewables UK Good Practice Guidance 2014[6]. The Applicant would also build on recent UK best practice in innovative local procurement including the implementation of a Local Contractor Policy, where additional weight is given in the tendering process to primary contractors that show a clear commitment to increasing local content in their supply chains. An auditing process would also be conducted so that the amount of local content sourced during the construction phase is recorded and fed back to the local business community.

As part of its Local Contractor Policy, the Applicant intends to establish a presence on Skye long before construction starts so that local suppliers are aware of opportunities. A number

[5] Gross value added (GVA) measures the contribution to an economy of an individual producer, industry, sector or region.

[6] Renewables UK Good Practice Guidance 2014: Local Supply Chain Opportunities in Onshore Wind.

of ‘Meet the Supplier’ events would be organised well in advance of the main tender process commencing to ensure that local businesses are aware of opportunities to bid for contracts.

The construction period is expected to last approximately 18 months and would benefit the local economy through expenditure on purchases of accommodation, food, drink, fuel, etc. that are needed to sustain the construction workforce. These beneficial effects would be experienced mainly by businesses within the tourism sector, or those that are partly dependent on tourism for their income e.g. the retail sector.

Anecdotal evidence arising from other wind farm construction projects shows that local businesses such as accommodation providers generally welcome the enhanced level of occupancy that is achieved due to construction contractors using their accommodation during periods of the year that are traditionally considered ‘low season’. However, on Skye, peak season occupancy rates are generally high, and consequently the use of holiday accommodation by construction workers may lead to displacement of tourism visitors. This could have a temporary adverse effect on the local tourism economy.

For accommodation businesses it is unlikely that displacement of tourism visitors would result in an adverse effect to the individual business, as occupancy rates would be maintained at a high level. Indeed, the overall effect of the 18 month construction period is likely to result in increased occupancy during the period of construction activity. The benefits of increased business during the low season, although temporary, can allow businesses to invest in improvements that would not otherwise be affordable, leading to a long term enhancement. Within the LAI, local businesses including accommodation and food and drink businesses may experience significant beneficial impacts during construction due to use by construction workers.

Any adverse impact arising from the displacement of tourism visitors is more likely to be experienced elsewhere in the tourism economy due to a reduction in expenditure on goods and services at other businesses such as visitor attractions, recreational businesses (such as cycle hire) and food and drink establishments. This adverse effect would be partially offset by construction workers spending on certain goods and services, such as food and drink.

In order to manage the effects of construction worker accommodation on the local tourism economy (including with other wind farm developments), the outline Construction Environmental Management Plan (CEMP) includes provision for an Accommodation Strategy to be agreed with THC prior to construction commencing to ensure that sufficient accommodation capacity would be available at peak times to avoid displacement of tourism visitors. The impact on the tourism economy is expected to be low and would be not significant.

The number of recreational users of the site is considered to be low due to the lack of facilities, other than use of the Ben Aketil access track for walking and cycling. Whilst use of the access track would need to be managed for safety reasons, it is intended to keep the existing Ben Aketil access track open as much as possible throughout the construction period. A preliminary Access Management Plan (AMP) outlines how the Applicant would manage public access during the construction, operation and decommissioning of the Proposed Development and measures for ensuring public safety during construction will be set out in the CEMP. The impact of excluding the public from the site for a short term temporary period during construction is considered be low and the level of effect would be negligible and not significant. The AMP also provides suggestions for access enhancements during the operational phase of the Proposed Development which would facilitate opportunities for improving access in the local area surrounding the Proposed Development.

Any loss of shooting opportunity over the site would be managed to ensure that commercial shooting could continue elsewhere on the estate during the construction period. The adverse impact would be short term and the level of effect would be minor and not significant.

It is expected that there could be between seven and nine indirect jobs created in the operational and maintenance supply chain for the Proposed Development located within the WSA.

In terms of the local direct and indirect jobs creation, the overall total number of full time equivalent jobs that could be created in THC area is between 10 and 13. Given that there are around 128,000 jobs located in the WSA, this stimulus to local job creation is judged to be negligible (positive) but not significant.

In addition to the value of the investment in the local economy through the operation of the wind farm, the Proposed Development would give rise to additional long term social and economic benefits arising from community benefit payments and the opportunity for community investment in the wind farm as discussed in Section 3.0.

4.7 Other Considerations (EIA Report Chapter 9)

4.7.1 Traffic and Transport (Technical Appendix 9.1 and 9.2)

The original Ben Sca Wind Farm application (20/00013/FUL) was supported by an EIA Report, which included Chapter 12: Site Access, Traffic and Transport Chapter, which is included in this EIA Report as **Annex 9.1A**. The assessment considered the impacts associated with nine turbines and so represents a worst-case assessment of the possible maximum traffic flows generated during construction. The assessment of the consented development, as presented in Chapter 12 of the Ben Sca Wind Farm EIA Report concluded that all effects resulting from the additional traffic would not be significant.

A Transport Assessment for the Proposed Development is presented in **Technical Appendix 9.1**. This assessment reviews the Proposed Development against the consented development.

As per the consented development, the Proposed Development would be accessed via the existing Ben Aketil Wind Farm track, a purpose-built track linking into the site from the A850 and so the access arrangements will not change from that already consented.

The Proposed Development changes which are likely to result in a change to the traffic generation during the construction phase relate to the additional aggregate required for the increased hardstanding area and the increased lengths of tracks; the increased turbine blade tip height has also been considered in relation to transportation of turbine blades to site. The proposed larger hardstanding areas and the additional lengths of tracks will result in a greater volume of aggregate required for construction and so the materials calculator has been updated to take account of the increase.

There would be an additional 111 HGV trips over the 18 month construction period, however, based on the most realistic construction phasing in accordance with the current design specification, assuming a 5.5 day week, the peak HGV trips are predicted to be 70 two-way movements per day, which is a decrease of two HGV two-way movements compared to the consented development. Since there wouldn't be any additional HGV movements the assessment of the effects and conclusions would not change from the consented development. Therefore, no significant effects would result for the Proposed Development.

It also concludes no significant negative cumulative effects on the A850 and that the measures outlined in the Construction Traffic Management Plan (CTMP) presented in **Technical Appendix 9.2** will ensure that any impacts will be managed.

4.7.2 Noise and Vibration (Technical Appendix 9.3)

A noise assessment was carried out for each of the previous two applications and planning consent was granted by THC, with noise limits applied at nearby noise sensitive receptors (NSRs) as conditions for planning.

The Proposed Development would not alter the construction noise and vibration impacts previously reported in the EIA Reports for the consented development.

An updated operational noise impact assessment was undertaken for the Proposed Development, which demonstrated that the Proposed Development would operate within the consented noise limits and would therefore be acceptable.

In the event that noise levels from the Proposed Development were subsequently found to exceed the consented limits, a mitigation scheme could be implemented via a suitably worded planning condition. If required in practice, the mitigation scheme would be developed following the identification of the specific receptor, together with the wind speeds and directions at which the consented noise limits are exceeded.

The Proposed Development would not introduce any amendment to the methods employed to construct the wind farm that would materially change the previous construction noise assessments undertaken for the consented development. Therefore, it was agreed with THC that an additional construction noise assessment would not be undertaken. Construction would be undertaken in line with good practice measures to minimise any noise effects during construction. Measures to control the noise from construction activities would be set out within the CEMP (an outline of which is provided in **Technical Appendix 1.1**).

4.7.3 Climate and Carbon Balance

Wind farms in upland areas tend to be sited on peatlands which hold stocks of carbon and so have the potential to release carbon into the atmosphere in the form of CO_2 if disturbed. The Proposed Development is located predominantly in an area of Class 1 Priority Peatland Habitat however through extensive survey peat depths have been mapped and recorded across the site and the site design process has avoided areas of deeper peat.

With respect to turbines, emissions from material production are the dominant source of CO_2. Emissions arising from construction (including transportation of components, quarrying, building foundations, access tracks and hardstandings) and commissioning are also included in the calculations.

The calculations of total CO_2 emission savings and payback time for the Proposed Development indicates the overall payback period will be about 1.8 years when compared to the fossil fuel mix of electricity generation. This means that the Proposed Development is anticipated to take around 1.8 years to repay the carbon exchange to the atmosphere (the CO_2 debt) through construction; the site would in effect be in a net gain situation following this time period and can then claim to contribute to national emissions reduction objectives thereafter for its remaining operational life.

It is predicted that the increased output of the Proposed Development will provide enough renewable electricity to meet the needs of around 45,000 UK homes and offset approximately 2.46 million tonnes of CO_2 over its lifetime (when compared to fossil fuels); and 1.20 million tonnes of CO_2 over its lifetime (when compared to a grid mix). For

reference this is approximately 6,500 more UK homes powered; 0.69 million tonnes of CO_2 offset (when compared to fossil fuels) or 0.21 million tonnes of CO_2 offset (when compared to a grid mix) over its lifetime more than the consented development.

4.7.4 Shadow Flicker

Shadow flicker may occur under certain combinations of geographical position and time of day, when the sun passes behind the rotors of a wind turbine and casts a shadow over neighbouring properties. As the blades rotate, the shadow flicks on and off, an effect known as shadow flicker. The effect can only occur inside buildings, where the flicker appears through a window opening.

In line with the best practice guidance, a study area based on a distance of 11 rotor diameters from the proposed turbines has been employed to determine the zone of potential shadow flicker incidence of the Proposed Development. The proposed turbines have a rotor diameter of up to 138m, which gives a study area of 1,518m from the turbines. In addition to this a further 50m area was added to the 11 rotor diameter distance in order to account for potential micrositing should the Proposed Development receive consent (total study area distance = 1,568m from proposed turbine locations).

Just one property at Upperglen is identified within the shadow flicker study area (1,568m), located approximately 1,456m from proposed turbine 9.

A shadow flicker model has been run for the Proposed Development study area and concludes that there would be no shadow flicker effects experienced at Upperglen or any other nearby property due to the distance, location and orientation of the properties in relation to the Proposed Development.

4.7.5 Telecommunications and Radar

Wind turbines can potentially cause interference to telecommunication links, including those used by telecommunications operators, and also have the potential to adversely affect analogue television reception. Consultation with link operators was undertaken for the consented development, with no issues identified by any of the operators during the determination of the application.

No new links have been identified and therefore there is not anticipated to be any interference with telecommunications links. Additionally, the Proposed Development is located in an area that is now served by a digital television transmitter and, therefore, television reception is unlikely to be affected by the Proposed Development as digital signals are rarely affected. In the unlikely event that television signals are affected by the Proposed Development, reasonable mitigation measures would be considered by the applicant.

4.7.6 Aviation

The consented development was the subject of discussion with NATS Safeguarding regarding the potential visibility of the wind turbines to their radar on Tiree; as they believed that without suitable mitigation an adverse impact would result on their air traffic operations. An agreement was reached between NATS and the Applicant for mitigation to overcome this impact for the consented development, and NATS has further confirmed that this agreement would cover the Proposed Development and therefore no significant adverse effects on their air traffic operations are predicted.

It is accepted that the planning conditions relating to aviation and infra-red lighting for the consented development would be employed for the Proposed Development. The proposed lighting has been confirmed as acceptable by the Ministry of Defence (MOD).

Assessment and consultation with Highlands and Islands Airports Limited (HIAL) confirmed that there would be no impact to the Benbecula Instrument Flight Procedures and no objection to the Proposed Development by HIAL.

4.7.7 Risk of Accidents and Other Disasters

The vulnerability of the Proposed Development to major accidents and natural disasters, such as flooding, sea level rise, or earthquakes, is considered to be low. The vegetation and openness of the site does present a potential fire risk. The outline CEMP contains measures for reducing the risk of fires during the construction of the Proposed Development.

In the winter months it is possible that ice formation could occur on the turbine blades. Ice throw is the term used where ice has formed on a turbine blade and subsequently is shed from the turbine. To mitigate the risk of ice throw occurring, the wind turbines would be equipped with an ice detection system, shutting down the turbine until the ice has thawed. The risk to public safety is considered to be very low.

In addition, the nature of the proposals and remoteness of the site means there would be negligible risks of population and human health.

5.0 Summary of Significant Effects

Topic	Mitigation	Residual Significant Effects
Landscape and Visual	Design	Significant visual effects at 2 viewpoints: Viewpoint 2 (Edinbane Top Road) and Viewpoint 12 (Minor Road to Greshornish); and 3 settlements: Edinbane, and Kildonan and Flashader, all of which lie within 6km of the Proposed Development.
Ornithology	Design, Pre-construction Surveys, CEMP, BPP, EnvCoW, Post consent Monitoring	None
Ecology	Design, Pre-construction Surveys, CEMP, EnvCoW, HMP, Post consent monitoring	None
Hydrology, Hydrogeology and Soils	Design, CEMP, Water Quality Monitoring, Peat Management Plan, SuDS	None
Cultural Heritage and Archaeology	Design, Fencing off Features	None
Socio-economics and Land Use	Design	None
Traffic and Transport	CEMP, CTMP, AMP	None
Noise	Design, CEMP, Mitigation Strategy	None
Carbon Savings	Design	Displacement of approximately 2.46 million tonnes of CO_2 over the wind farm lifetime when compared to the amount of CO_2 fossil fuels would have produced to generate the same amount of electricity.
Other Notable Effects (not necessarily reported as significant in the EIA Report)	-	Production of an average of approximately 145,000MWh of electricity annually; which equates to the power consumed by approximately 45,000 average UK households (20,000MWh and 6,500 more homes than the consented development). In addition to the value of the investment in the local economy through the operation of the wind farm, additional long term social and economic benefits would arise from community benefit payments (£8.16 million over 40 years) and the opportunity for community investment in the wind farm. The Proposed Development would provide 26.2ha of additional peatland restoration in comparison to the consented development. Potential for enhanced access for walking and cycling on site, with the possibility for circular routes.

6.0 Next Steps and Further Information

THC will consider the planning application and the findings of the EIA. Before making a decision on the application, THC will consult a number of consultees including NatureScot and SEPA and will consider all representations received from other parties including members of the public.

A copy of the NTS will be made available for download from the applicant website at: www.benscawindfarm.co.uk.

A hard copy of the EIA Report can be viewed at The Highland Council Offices, Tigh na Sgire, Park Lane, Portree, IV51 9ER during their opening hours.

Hard copies of this NTS are available free of charge from:

info@wind2.co.uk

07570 948886

Wind2 Limited,

2 Walker Street,

Edinburgh,

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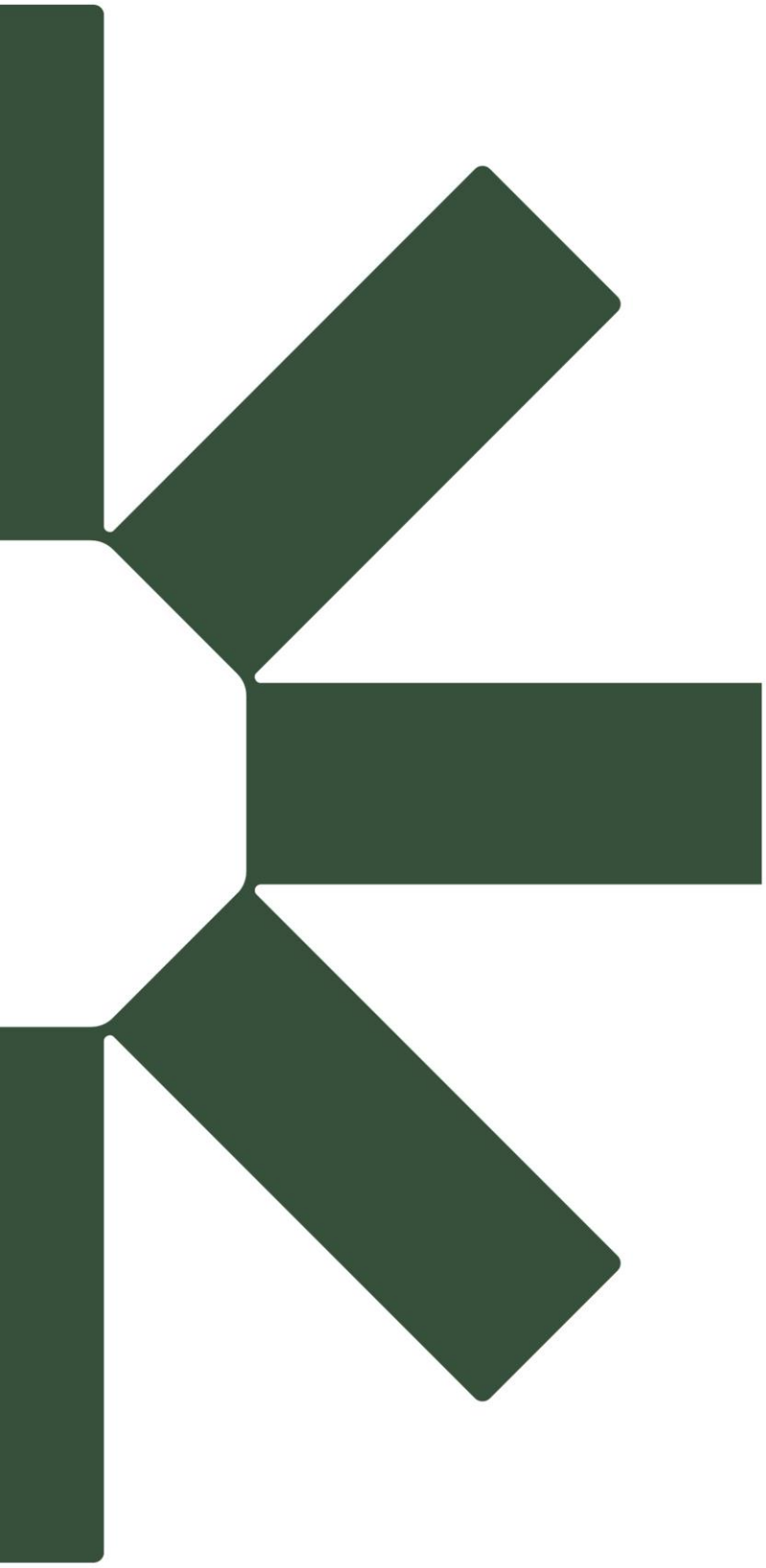
Hard copies of the EIA Report may be purchased by arrangement from the above address for £1,400 per copy, or free for a DVD/USB. The price of the hard copy reflects the cost of producing all of the Landscape and Visual photographs at the recommended size.



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