

TECHNICAL APPENDIX 6.1: SCOPING RESPONSE COMMENTS

Balmeanach Wind Farm
Prepared for: Balmeanach Wind Farm Limited

SLR Ref: 428.11223.00001
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| Consultee | Summary of Key Issues | Where Addressed in EIA Report |
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| | <p><u>Hydrology</u> The EIA Report will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree.</p> | <p>Chapter 10: Hydrology, Hydrogeology and Soils Technical Appendix 8.5: Outline Habitat Management Plan</p> <p>Chapter 10: Hydrology, Hydrogeology and Soils (note: no water crossings proposed as part of design)</p> |
| | <p><u>Access</u> Map of wider path network in the area provided by Access officer. Access officer states that reference has only been made in scoping report to a path outwith the site and an unclassified path through the Edinbane Wind Farm.</p> <p>Confirmed that the Access Management Plan (AMP) is a requirement due to the wide ranging access rights that the general public have under the Land Reform (Scotland) Act 2003. The AMP should deal with currently access both across the site and any access being taken close to the site which may be affected including access tracks and roads. As well as managing current access provision THC are also supportive of the neighbouring communities aims of linking access both within and between developments and would welcome any discussion on how the development could meet those aims.</p> <p>Require an Access Management Plan to be developed in consultation with the Highland Council as Access Authority and other relevant stakeholder groups such as the neighbouring Community Councils, Companies and Development Trusts. This AMP would be included as part of the EIAR submitted with the full application, and is in accordance the Highland Wide Local Development Plan, Policy 77, which covers Outdoor Access. Access to be clearly referred to in the contents of the EIAR to allow ease of finding it. Refer to Appendix 6 of Nature Scot's Environmental Impact Assessment Handbook when developing AMP.</p> <p>Included within the AMP - how each known access route that was likely to be affected by the project would be dealt with both during construction, and following completion. For clarity this refers to any commonly used access, not just public rights or way or core paths.</p> <p>Details on any access improvements from this development and linking into other projects for the wider community benefit - reference made to Ben Sca, Ben Aketil & SSEN's Skye Reinforcement project.</p> <p>A list of 6 directly affected groups to consult on current and potential access improvements provided e.g. Struan Community Council etc.</p> <p>Access loops which link up to other routes lacking on Skye & active travel opportunities to link communities also being looked at by local communities. Consider access compliant bypass gates at vehicular gates.</p> | <p>Chapter 14: Socio-economics, Tourism, Recreation and Land Use</p> <p>Technical Appendix 14.3 Preliminary Access Management Plan (PAMP)</p> |
| | <p><u>Environmental Heath</u> Cumulative noise assessment has not considered 22/01468/SCOP Glen Ullinish II Wind Farm - Erection and Operation of a Wind Farm, comprising of up to 59 Wind Turbines</p> <p>THC happy to accept the approach to adopt a margin of up to 0.7dB to be applied to predicted noise levels for the Balmeanach development at all noise sensitive receptors and wind speeds. However, the applicant will be required to submit an assessment of cumulative noise which uses consented limits or predicted levels with a 2dB margin to be applied to all other wind farms.</p> <p>Construction noise - if applicant intends on carrying out noisy work outwith standard working hours a detailed construction noise assessment will be required. Details of information to include in this assessment are listed in the consultation response.</p> <p>Investigation to identify private water supplies and to prevent contamination or disruption is required.</p> | <p>Chapter 13: Noise</p> <p>Chapter 10: Hydrology, Hydrogeology and Soils</p> |

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| | <p>Dust suppression scheme may be required depending on proximity of working area to houses.</p> <p><u>Transport</u> Transport Assessment (TA) or a section on traffic & transport within the EIA Report is required. This should identify all Council maintained roads likely to be affected & consider the impact of development traffic on these roads. Measures to mitigate the impact to be proposed where necessary. Cumulative impacts with other developments should be identified. The proposed route for general construction traffic should also be identified. Prior to production of TA, the applicant shall undertake a detailed scoping exercise in consultation with the Council's Transport Planning team and Transport Scotland. Note increase in traffic volumes on Skye during summer. Onsite borrow pits & batching plants could reduce impact on local roads.</p> <p>Assessment methodology for TA included in response.</p> <p>The proposed access at its junction with the public road should be clearly detailed on dimensioned drawings related to OS data; and include confirmation of geometry, construction and drainage as well as junction visibility splays.</p> <p>The Council's strong preference is for direct access from the A850, preferably via an existing wind farm access.</p> <p>Mitigation required may include; new or improved infrastructure, road safety measures and traffic management. Traffic management shall include measures to ensure that development traffic adheres to approved routes.</p> <p>A detailed review of the preferred route to site for AIL's, to include swept path assessment and consideration of any structures along the route, shall be undertaken. It is likely that a trial run to demonstrate the suitability of the route will also be required.</p> <p>Early consultation with the Council's Structures Section is recommended with regard to affected Council maintained structures.</p> <p>A Construction Traffic Management Plan (CTMP) to help control and reduce the impact of construction traffic will be required prior to the commencement of development. A Framework CTMP should be included in the planning submission and consultation with stakeholders, including local community representatives, will be necessary regarding the detailed content and implementation of the CTMP. Early contact with the Council's local Roads Operations Manager is recommended regarding the detailed content of the CTMP.</p> <p>A suitable agreement relating to Section 96 of the Roads (Scotland) Act and appropriate planning legislation will therefore be required. The agreement shall include the provision of an appropriate Road Bond or similar security.</p> <p>The Council's Flood Team should be consulted with regard to potential flooding and drainage issues associated with the development.</p> | <p>Technical Appendix 3.1: Outline Construction Environmental Management Plan</p> <p>Chapter 12: Site Access, Traffic and Transport</p> <p>Technical Appendix 12.3: Framework Construction Traffic Management Plan</p> |
| <p>Highlands & Islands Airports Limited (HIAL)</p> | <p>Turbine 8 may impact the safeguarding criteria and operation of Benbecula Airport.</p> <p>Aviation Impact Feasibility Study (AIFS), of the proposed Turbine 8, is undertaken to understand any impact on the infrastructure and operation of Inverness Airport</p> <p>The following are required to be assessed by the applicant: Instrument Flight Procedures (IFPs), Lighting Requirement</p> <p>HIAL submitted a holding objection until the AIFS has been submitted to and reviewed by HIAL.</p> | <p>Chapter 15: Other Considerations (note: further consultation confirmed design freeze would not conflict with safeguarding criteria with no further objection to the project)</p> |
| <p>Historic Environment Scotland (HES)</p> | <p>10km study area is required & will look to see this in EIA Report.</p> <p>Use of ZTV to scope out monuments - be aware that views towards monuments may include the development and therefore need to be considered in the EIA Report. This should also include consideration of views from the sea.</p> <p>If a monument is scoped out of further assessment on the basis of the ZTV, we would expect to see written justification of this in the EIAR based on consideration of its setting</p> | <p>Chapter 11: Cultural Heritage and Archaeology (note: further consultation was undertaken and is documented in Chapter 11)</p> |

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| | <p>Advises that direct effects (physical impacts) and indirect effects (impacts on setting) are afforded equal protection in Scottish Planning Policy.</p> <p>Use of term 'heritage significance' is misleading. Correct term is 'cultural significance'</p> <p>Managing Change in the Historic Environment: Setting (HES 2016) has been updated in 2020 - use most recent version.</p> <p>Grid references and larger scale figures are required to enable accurate location of wireframes - happy to discuss these with applicant.</p> <p>A number of scheduled monuments close to the site boundary are listed & discussed further in Scoping Response Annex - these assets may be sensitive to change.</p> <p>The EIA Report should assess impacts on the settings of LB498 Dunvegan Parish Church (Church of Scotland), LB501 Dunvegan Castle, approach causeway and bridges and GDL00164 Dunvegan Castle</p> <p>Where a nationally important historic environment asset within 10km of the Proposed Development would be visible from the development, or where the development would be visible in key views towards such an asset, we would expect that the applicant should provide wireframe visualisations to accompany the assessment of the impact on the setting of the asset. Where an impact on the setting of a nationally historic environment asset is identified during the assessment, we would expect that photomontages showing the impacts should be provided.</p> | |
| <p>Ministry of Defence (MoD)</p> | <p>Hub heights and rotor diameters required to start the assessment process. Data sent via planner MOD has concerns with the proposal relating to the potential of the turbines to create a physical obstruction to air traffic movements.</p> <p>Proposed Development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2m above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.</p> <p>To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.</p> <p>As a minimum the MOD would require that the perimeter turbines are fitted with 25cd or IR lighting.</p> | <p>Chapter 15: Other Considerations</p> |
| <p>NATS Safeguarding</p> | <p>Unable to thoroughly investigate the effects of the Proposed Development on Operations in the time-frame provided - relevant teams are being consulted.</p> <p>Conflicts with safeguarding criteria noted - NATS (En Route) plc objected to the proposal. Notification to be received within 4-6 weeks of the results of operational assessment. If assessment shows impact to be acceptable, objection would be withdrawn.</p> <p>Operational assessment received:</p> <ul style="list-style-type: none"> • Predicted impact on Tiree Radar: Development is likely to cause false primary plots to be generated & a reduction in the radar's probability of detection for real aircraft is also anticipated. • Prestwick ATC - unacceptable effect to their operations • Military ATC - Acceptable • No predicted impact on NATS navigational aids or en-route radio communication assessment <p>En-route consultation - A technical impact is anticipated - deemed to be unacceptable without further investigation.</p> | <p>Chapter 15: Other Considerations (note: further consultation was undertaken and is documented in Chapter 15)</p> |
| <p>NatureScot</p> | <p>The proposal has the potential to adversely affect a number of important natural heritage interests. If adverse effects on nationally important natural heritage interests are identified, and cannot be mitigated, then we may object to the proposal</p> | |

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| | <p>Scoping advise focuses on issues which may raise issues of national interest: potential cumulative impacts on the surrounding National Scenic Areas and Wild Land Areas, on the Favourable Conservation Status of Golden eagle and White-tailed eagle populations, and effects on priority peatlands and carbon-rich soil. Failure to address significant effects on any of these aspects may result in an objection to the scheme.</p> <p><u>Landscape and Visual</u></p> <ul style="list-style-type: none"> notable differences in design and scale of the Proposed Development and neighbouring schemes. particular interest in any adverse effects on the special qualities of Trotternish National Scenic Area (NSA), The Cuillin Hills NSA, Duirinish Wild Land Area (WLA) and Cuillins WLA and welcome that these are scoped in to the assessment View Points (VPs) are appropriate Agree that VP20 Bruach na Frith (Cuillins) should be a wireline only VP, taking into account the distance, context of existing development and lack of turbine lighting in this case - full written assessment of the VP is however requested including consideration of the Special Qualities of the NSA. We anticipate that cumulative landscape and visual impacts will be a key consideration but are content for THC to agree which developments should be included in that assessment <p><u>Ornithology</u></p> <ul style="list-style-type: none"> welcome the 2 years of data collection request that the Post Construction Monitoring (PCM) data from Ben Aketil is also considered and used in the assessment concern over gaps in data coverage around T1 and T2¹ - turbines should not be located where bird data is lacking cumulative impact assessment will be a key consideration. Cumulative assessment is an ongoing process and it may be necessary to adjust previously quoted figures (e.g. from earlier EIA reports) to take account of new information or changes in important parameters (such as avoidance rates). Where a cumulative impact of national or regional significance is possible we are likely to require a population viability analysis to be undertaken which should utilise the latest population parameters. Cumulative impacts should be assessed at the relevant biogeographical scale which will depend on the species affected. Where there is uncertainty about the appropriate scale, effects may be calculated at multiple scales (e.g. Skye, regional, national) but these should always include a Natural Heritage Zone (NHZ) assessment. Given the number of wind farm proposals currently at post-scoping stage, and the time-lag between completion of assessments and determination of planning applications, we recommend dialogue between consultants in order to ensure that all relevant data is included We also recommend early consideration of potential mitigation measures; we welcome consideration of innovative and collaborative approaches to maintaining the Favourable Conservation Status of golden eagle and white-tailed eagles. <p><u>Ecology & Peatland</u></p> <ul style="list-style-type: none"> An Cleireach Site of Special Scientific Interest will not be affected by proposals welcome the National Vegetation Classification (NVC) and peat depth surveys and the commitment to avoid areas of uncommon peatland habitat types such as bog pools and other sensitive peatland habitat welcome the undertakings to develop mitigation, compensation and enhancement proposals as part of an Outline Habitat Management Plan - this should include an assessment of the condition of the peatland across the site. Discussion with landowners to improve peatland is required | <p>Chapter 7: Landscape and Visual</p> <p>Chapter 9: Ornithology</p> <p>Chapter 8: Ecology</p> <p>Chapter 10: Hydrology, Hydrogeology and Soils</p> <p>Technical Appendix 8.5: Outline Habitat Management Plan</p> |
| RSPB Scotland | <p>Area is important for immature Golden Eagle Concern over potential impact on Hen Harrier & White-tailed eagle Suggest it would be prudent to include raptor roost surveys (including white-tailed eagles) and winter walkovers within the suite of bird surveys. We would also recommend that the existing north access tracks are also covered by bird surveys so that likely increased usage during construction and can be adequately assessed, particularly in combination with the other wind farm developments that share the same access tracks (i.e., Ben Aketil and Ben Sca/extension).</p> | <p>Chapter 9: Ornithology</p> |

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| | <p>We note that the area within the red line boundary between the Ben Aketil wind farm and the Allt a Choire is not covered by any bird surveys. This is a particularly sensitive area for hen harriers, and therefore, if any infrastructure or activity is planned for this area, bird (and habitat) surveys will need to be undertaken.</p> <p>Breeding bird surveys do not cover a 500m buffer around T1 and T2 and there are gaps in the coverage of habitat surveys within the red line boundary as illustrated in Figure 9.</p> <p>Recommend the production of a Golden Eagle Terrain Model and Population Model for WTE, possibly GE?</p> <p>Outline Habitat Management Plan & Species Protection Plan should be included. Protocols for reporting collisions should be included.</p> | <p>Technical Appendix 9.4: Golden Eagle Territory Modelling Technical Appendix 9.5: White Tailed Eagle Population Modelling Technical Appendix 8.5: Outline Habitat Management Plan</p> |
| <p>Scottish Environment Protection Agency (SEPA)</p> | <p>List of information required in support of application.</p> <p>Recognition that minor improvements to the locations of T3, T4, T5, T6 and T9¹ will further minimise impacts on peat</p> <p>We note that the peat surveys submitted demonstrate that T7, T9 and T10 are in areas of deep peat, and we would expect these locations to be further scoped to locate these turbines outwith areas of deep peat.</p> <p>We welcome that an NVC survey has been submitted (Figure 9), however, between this and the peat survey we do not support the location of T10, as this is in the deepest peat and M1 Bog Pools</p> <p>We would expect floating tracks to be designed over areas of deep peat.</p> <p>All tracks should be kept a minimum 50m away from any waterbody, with the exception of watercourse crossings and connecting tracks should minimise watercourse crossings.</p> <p>It will need to be confirmed that a minimum 50m buffer is maintained between the water environment and turbines/crane hard-standings. We can see that there are six watercourses that will need to be considered both in terms of buffers and watercourse crossings</p> <p>We would encourage the applicant to share the location of the borrow pit, battery storage, site compounds and temporary laydowns against the NVC and peat depth surveys, as these too should avoid near-natural habitats and areas of deep peat</p> <p>Carbon balance to be included in the EIAR.</p> <p>Early sight of Peat Management Plan (PMP) if possible. NVC and Peat combined plan requested.</p> | <p>Chapter 10: Hydrology, Hydrogeology and Soils</p> <p>Technical Appendix 15.1: Carbon Calculator Technical Appendix 10.2: Peat Management Plan</p> |
| <p>Scottish Water (SW)</p> | <p>Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the Proposed Development can currently be serviced.</p> <p>Scottish Water will not accept any surface water connections into our combined sewer system. Limited exceptions to this apply and details provided.</p> <p>In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.</p> | <p>Chapter 10: Hydrology, Hydrogeology and Soils</p> |
| <p>Transport Scotland</p> | <p>Transport Scotland will respond separately to the planning application for this development by means of a TRNPA2 if formally consulted</p> | <p>Chapter 12: Site Access, Traffic and Transport</p> |

¹ Turbine location numbers refer to Scoping Layout D (Figure 2.3)

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