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Introduction

- 2.1 **Chapter 2: Site Description and Design Evolution**, of the Environmental Impact Assessment (EIA) Report sets out the design strategy for the Proposed Development which is to balance achieving maximum energy yield whilst creating a layout which mitigates (where possible) visual effects and effects on other environmental constraints. The design strategy for the Proposed Development remains the same as set out in the EIA Report.
- 2.2 This SEI Chapter sets out the design changes that have been made to the Proposed Development following consultee responses to the Balmeanach Wind Farm planning application (Ref: 23/04194/FUL).
- 2.3 The application layout of the Proposed Development refers to the layout assessed in the EIA Report; and the revised layout of the Proposed Development refers to the layout assessed in this SEI Report.

Consultation

- 2.4 NatureScot, Scottish Environment Protection Agency (SEPA) and Royal Society for the Protection of Birds (RSPB) responded to the planning application consultation, requesting that some of the proposed infrastructure be amended, in order to address specific concerns.
- 2.5 The Highland Council (THC) also requested amendments to the access infrastructure which needed to be included in the assessment.
- 2.6 All the above consultees were keen to see amendments to the Outline Habitat Management Plan (OHMP) to ensure that additional areas of restoration and enhancement are included.
- 2.7 The Applicant has proactively engaged with each of the consultees to address the concerns raised, resulting in the changes to the Proposed Development which are presented in this SEI Report.
- 2.8 **Table 2-1** details the relevant comments from the consultee responses in relation to design changes. Where additional responses have been received these are included.



Table 2-1: Consultation Responses Requesting Design Changes

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
NatureScot	12 April 2024	 Application Response: "The predicted collision risk for white-tailed eagles is particularly high compared to most other wind energy proposals, which would add significantly to a growing cumulative collision risk at a national level. This is likely to result in significant impacts on the growth rate of the national population of this re-introduced protected species, which will slow the rate of range expansion and hinder progress towards restoring its former range across Scotland. To allow a more accurate calculation of collision risk, we advise that another year of vantage point survey work is carried out encompassing all of the proposed turbine locations, or that Turbines T1 and T2 are dropped from the proposal". "Depending on the access route option selected, a total loss of up to 27.41ha of priority peatland habitat is estimated for this proposal. The restoration area proposed is therefore approximately three times the area that is expected to be impacted by the development. Our recommendation is that the area of restoration should be looking for restoration to be approximately 259.1ha if route A and A1 is used. We therefore consider that the proposed area of restoration is not sufficient to overcome the impacts of the development. The council may wish to request that a review of the Habitat Management Plan is carried out and that additional areas are proposed for restoration. We also recommend that the area of 	Turbine 1 (T1) has been removed from the Proposed Development. The updated collision risk after the removal of T1 reduces by 32.6% to 0.93, based on the 2020-22 survey data. A re-assessment of the Collision Risk Modelling (CRM) based on the removal of Turbine 1 is provided in SEI Chapter 9 and in Confidential SEI TA9.3 . The proposed peatland restoration area has been increased from 77.75ha to 293.47ha providing a restoration ratio in line with NatureScot guidance of 1:10 and 10.07ha of enhancement. Whilst the enhancement proposals fall slightly short of 10%, the proposals for habitat management have been greatly increased to those previously proposed and are considered appropriate on this site as the areas identified need to be balanced with the continued use of the common grazings land. Additionally, 19.15ha wet heath restoration is proposed to offset the loss of Annex 1 wet and dry heath communities and provide further enhancement.



Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		enhancement should be in addition to this, for example 10% of the baseline blanket bog habitat."	Further details and justification for the updated habitat management proposals are presented in SEI TA8.5: OHMP Update .
NatureScot	17 December 2024	 Further Response: "We consider that the applicants have now demonstrated that there is sufficient recent vantage point data covering turbines T1 & T2 if the 2023 data from the Ben Sca Redesign and the 2023 Edinbane Repowering survey data sets are used. This supplements the 2020-2022 data set used for the other turbines." "For white-tailed eagles, we consider that using the Ben Sca Redesign data for turbine T1 and the Edinbane Repowering survey data for turbine T2 is likely to be most realistic. Combining this with the 2020-2022 data gives an estimated annual collision risk for Balmeanach Wind Farm of 1.817 birds per annum. Turbine T1 on its own accounts for an estimated collision risk of 0.873 birds per annum, which is almost as much as the other nine turbines together. We advise that removing turbine T1 would be likely to significantly reduce the collision risk from this proposal." 	Noted. The 2023 survey data from both Ben Sca Redesign and Edinbane Repowering sites have been used to inform the updated assessment, with results presented in SEI Chapter 9 and Confidential SEI TA9.3 . T1 has been removed from the Proposed Development. The updated collision risk after the removal of T1 reduces by 32.6% to 0.93, based on the 2020-22 survey data. A re-assessment of the Collision Risk Modelling (CRM) based on the removal of Turbine 1 is provided in SEI Chapter 9 and in Confidential SEI TA9.3 .
RSPB	15 December 2023	 Application Response: <i>"For White-tailed Eagle: Reduce the number of turbines overall. For instance Ts 1 and 2 should be considered for removal as they were not included in the collision risk figures presented; or Ts 3 and 5 as they are at the highest elevations and overlap higher activity areas."</i> 	T1 has been removed from the Proposed Development. The updated collision risk after the removal of T1 reduces by 32.6% to 0.93, based on the 2020-22 survey data.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		 "Revise the Outline Habitat Management Plan (OHMP) to include actions to provide foraging habitat away from the proposed turbine array." "The peatland restoration area needs to be significantly increased in order to provide the appropriate levels for the compensation for Annex 1 habitat losses (32.03ha, track option B although this differs to the habitat losses quoted in the HMP) and the 'significant biodiversity enhancement' as required by Policy 3 of NPF4 and in line with new NatureScot guidance on development on priority peatland habitats. This guidance states "that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) would be in the order of 1:10 (lost:restored)" plus "an additional 10% of the baseline assessment of the extent of priority peatland habitat for enhancement". Therefore, around 320ha of peatland restoration is required for compensation, plus at least an additional 3.2ha which can be considered as biodiversity enhancement." 	A re-assessment of the Collision Risk Modelling (CRM) based on the removal of Turbine 1 is provided in SEI Chapter 9 and in Confidential SEI TA9.3 . The proposed peatland restoration area has been increased from 77.75ha to 293.47ha, providing a restoration ratio in line with NatureScot guidance of 1:10, which includes 113ha which is >500m from any turbines (including existing adjacent wind farms), providing enhanced foraging for eagles in areas away from the turbines and extends foraging areas for eagles that were previously unavailable due to the conifer plantation. The peatland restoration also includes an open corridor from Beinn Bheag up to Ben Aketil and Ben Sca, which lies in between the three proposed wind farms (Balmeanach, Ben Sca Redesign and Ben Aketil Repowering and Extension). Whilst the enhancement proposals fall slightly short of 10%, the proposals for habitat management have been greatly increased to those previously proposed and are considered appropriate on this site as the areas identified need to be balanced with the continued use of the common grazings land. Additionally, 19.15ha wet heath restoration is proposed to offset the loss of Annex 1 wet and dry heath communities and provide further enhancement. Further details and justification for the updated habitat management proposals are presented in SEI TA8.5: OHMP .

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
SEPA	18 December 2023	 Application Response: "Due to a lack of information on peat and peatland, and due to the impact the development could have on peat and peatland we object to the development until the issues outlined in section 1 below are addressed and we consider the proposals comply with Policy 5 of NRP4." 	Comments have been addressed by undertaking additional peat probing in February 2024 to inform changes to the infrastructure alignment which now form the revised layout. A clarification letter including the updated peat maps and proposed infrastructure changes was issued to SEPA on 25 April 2024. Further information is set out in SEI Chapters 3 and 10 .
			The revised design layout in relation to peat depth is shown on SEI Figures 10.1.6-10.01.7 and SEI Figures 10.2.3 -10.2.5.
		 "1. Peat 1.1. Baseline peat probing does not follow recognised best practice but in most areas it provides enough information to inform layout. However further probing work is required in the following locations before we can give a view on the acceptability of the options put forward: Proposed Track Alignment A2 The track north of T5 The turning spur south of T5 The track north of T8 The track spur to the Met Mast Location of Met Mast 1.2. The crane hard standing for T7 impacts on peat greater than 2.6 m deep; the infrastructure in this area should be rearranged and areas of deeper peat avoided. 	 The following amendments and considerations were made to the application layout to form the revised layout: Proposed Track Alignment A2 has been removed from the Proposed Development. The track north of T5 has been realigned. The turning spur south of T5 has been removed from the Proposed Development. The track north of T8 has been realigned. Changes to the track spur to the Met Mast have been considered and they would be kept as short as possible. The location of the Met Mast has been verified through additional peat probing.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		1.3. The turbine infrastructure for T10 impacts on peat greater than 2.3 m deep; the infrastructure in this area should be moved slightly further north and east so areas of deeper peat avoided.	 At T7, the area where peat is greatest is the blade laydown area which would be for temporary use only and reinstatement would take place post construction. Support areas within the blade laydown area would be arranged at suitable locations to avoid deeper areas of peat minimising the disturbance of peat within this area. Further information is set out in SEI Chapters 3 and 10. At T10, additional peat probing showed that the proposed turbine base would very marginally encroach into an area of peat of up to 2.3m deep. Movement of infrastructure within the micrositing allowance will be undertaken at the construction stage to avoid areas of deeper peat where possible. Further information is set out in SEI Chapters 3 and 10.
		 1.4. We note that some areas of the peatland are affected by grazing, drainage and fire but there are also areas of better-quality habitat. It is not clear how the quality of the peatland has informed the layout. We ask that a series of plans is produced showing peatland quality based on Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf (nature.scot). It should then be clearly demonstrated how the layout has avoided any areas of near natural habitat. 1.5. One of the significant ways that impacts on peat and peatland can be reduced is by minimising the extent of supporting infrastructure proposed. This has the 	SEI Figure 8.3 is provided to show the peatland condition within the site in line with SEPA guidance. It is confirmed that there are no peat areas of near natural habitat recorded on the site.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		 additional benefit of reducing impacts on habitats (including wetlands) and reducing the need for building materials such as aggregate. We note that two track alignments are proposed and of these Option A results in less new track and as a result would be the overarching layout we would expect to be implemented. However, there are elements of Option A which we would wish to see reconsidered. We would wish to see the layout amended to take into account the following to minimise new track: A track directly to T1 with a spur to the substation/BP4 area. A track directly from T1 to T2 and repositioning of BP1. Removal of the spur track to T3, T6, T5 and T9 and include infrastructure on main track. 	 SEPA's recommendations have been considered as part of the revised design layout. Further information is set out in SEI Chapters 3 and 10. The revised design in relation to peat depth shown on SEI Figures 10.1.6-10.01.7 and SEI Figures 10.2.3-10.2.5. At this stage both Option A and Option B are considered, although it is noted that Option A is preferred. Option A2 has been removed. The following amendments and considerations were made to the application layout to form the revised layout: A track directly to T1 with a spur to the substation/BP4 area was considered. Slight amendments have been made in this area and the track to T1 has been removed along with the removal of T1. A track directly from T1 to T2 and repositioning of BP1 was considered but is no longer considered relevant due to the removal of T1 from the Proposed Development. The spur tracks to T3 and T5 have been removed. Spurs to T6 and T9 were considered, however, the proposed infrastructure alignment is shown to satisfy the roads and hardstandings specification and complies with Health and Safety requirements. Due to the profile of the terrain and its steepness in these locations, no further

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
			changes are proposed here maintaining the application alignment with the separate spur. However, consideration has been given to the length of the spurs, and they would be kept as short as possible.
		1.6. We would welcome further clarification, by way of a layout plan, showing where floating tracks can be utlised on site.	At this stage no floating tracks are proposed due to the gradients on site. It may be possible to float part of the track leading to the met mast and this will be re-assessed at the pre-construction stage. Further information is set out in SEI Chapters 3 and 10 .
		1.7. We note the contents of the Peat Management Plan (PMP). Contrary to the comment below Table 5-1 of the EIA Report it would seem that there are greater reuse requirements than material that will be excavated by the development; the proposed reuse in borrow pit restoration seem relatively high, so it is hoped that this will balance out. All reuse proposals must meet best practice guidance. The PMP should be updated to reflect changes in layout to address above."	 Table 5-1 and Annex 10.2A Excavated Material Calculations of EIA Report Technical Appendix 10.2 PMP shows the estimated balance of peat excavated on site. Annex 10.2A of the outline PMP has been updated as part of the SEI Report and is presented in SEI Appendix 10.2A
			The net balance shown is negative and more material appears to be being required than excavated from site due to all four borrow pits being included in the calculations. Values are indicative at this stage and subject to further revision upon post-consent investigations.
			Post-consent, the Stage 1 PMP and the Outline Construction Management Plan (CEMP) would be updated with information obtained during detailed post-consent ground investigations and design stage.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		 "2.3 To ensure that peatland habitats lost by the development are offset and environmental enhancements are achieved at least 77 ha of peatland restoration shall be carried out in the areas identified in the Outline Habitat Management Plan (Appendix 8.5). We encourage the developer to consider increasing this area so that it is more in line with recent NatureScot guidance." 	These plans would be developed to update the Outline CEMP, with post-construction restoration plans. The Outline Habitat Management Plan (OHMP) has been updated (SEI TA8.5) to increase the restoration and enhancement of habitats for the site.
SEPA	18 June 2024	Further Response:	
		 "1. We welcome the additional peat probing work that has been carried out; this addresses the gaps we identified in our previous response." 	Noted.
		• "2. We note that the additional peat probing information has resulted in the proposal to amend the layout in a number of areas and other amendments have been made to reduce the overall length of track. We support all these amendments and would be able to withdraw our objection to the application if this information was formally submitted. Other variations, such as at T10, could further reduce excavation however as they are relatively minor we are content for this to be addressed in a finalized Dept Management Plan (DMP) which we	Noted. The amendments as discussed and agreed with SEPA are reflective of the revised layout presented in this SEI Chapter 2 and 3 and assessed in SEI Chapters 7 to 15 .
		will request by condition."	
		 "3. We thank you for providing information on peatland condition. We note that there is no near natural habitat on the site and as a result consider this issue addressed." 	Noted. This is confirmed by the inclusion of SEI Figure 8.3.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
		 "4. We note that no floating tracks are proposed due to site gradients, but that this will be reassessed at the preconstruction stage. We are content with this approach, the results of which can be picked up in the final PMP." "5. We welcome the proposal to update the draft PMP on the basis of the above amendments." 	Noted. Noted. This is covered in SEI Chapter 10 .
THC	30 July 2024	 Application Comments during Meeting: THC noted that they thought there may be scope for improvement to the turbine layout but in principle they are 'reasonably' supportive of the scheme from a landscape and visual perspective. It was requested whether Turbine 3 (T3), Turbine 5 (T5) and Turbine 8 (T8) could be moved further down the hill (east) to increase the screening of the turbine towers afforded by the landform, in particular from views from the west. VPs of concern are VP12 (Fiscavaig), VP14 (Totaig) and VP17 (Uig). The difference in hub height is a concern but THC appreciates that the landform across the Balmeanach site has influenced this. If T3, T5 and T8 cannot be re-sited, the Applicant would need to give detailed rationale as to why they cannot move. THC asked if a figure showing the rotor ellipses could be provided to provide context on the scoping constraints. 	Noted. A review of the location of turbines 3, 5 and 8 has been undertaken with a full rationale provided in Section 2.17 of this chapter. It is concluded that any potential movement east or south east of proposed turbines 3, 5 or 8 would not result in any notable improvement to the composition or prominence of the wind farm from this location, however it would result in a decrease in efficiency and energy generation of the Proposed Development. However, it is submitted that micrositing allowances of up to 50m may allow a slight improvement to the location of proposed T3, T5 and T8 during the pre-construction stage. SEI Figure 2.2a is provided to demonstrate the full environmental and technical constraints considered on the site for positioning the turbines, also showing the required spacing between turbines with rotor ellipses. SEI Figure 2.2b is provided to show the revised layout against the traffic light constraints.

Consultee	Date	Consultee Response in Relation to Design	How Consultee Responses have been Addressed and Location within the SEI Report
THC	14 January 2025	 Application Comments during Meeting: THC recommends that the red line boundary is expanded to include both the consented Ben Sca and Ben Sca Redesign track configuration, which will be controlled via condition (i.e. only one would be permitted to be built). THC recommends that the construction compound proposed for Ben Sca should also be included in the Balmeanach application and assessment in case Ben Sca does not get built. THC are asking applicants to seriously consider the ability to increase the HMP ratio in line with NatureScot and THC guidance, considering opportunities across the Estate and considering the financial aspects of the proposals. If the ratio cannot be met, argumentation should be provided in detail to reason why this is the case (including for instance economic reasons putting the Proposed Development at risk of implementation). However, the expectations are that the ratios can be improved meaningfully, if not achieved in full. The Balmeanach and Ben Sca Redesign HMPs should work alone or together and dovetail with each other so that they could be implemented as one if both schemes were consented. With regards to the design rationale feedback provided in August 2024 re T3, T5 and T8, THC confirmed that it was a query to see whether improvements could be made but wasn't an essential requirement to implement. 	This SEI Report is based on the revised layout of the Proposed Development which includes the addition of the proposed link track and permanent construction compound, to be used in the event that the consented Ben Sca Wind Farm does not get built. The red line boundary has not been amended, but an appropriate and full assessment is included in SEI Chapters 7 to 15 considering the use of both track options. Only one of the tracks to access the site would be built. The Outline Habitat Management Plan (OHMP) has been updated (SEI TA8.5) to increase the restoration and enhancement of habitats for the site.

Additional Design Rationale

2.9 The following information was provided to THC on 22 August 2024 in response to their design queries raised on 30 July 2024. Where relevant the information provided has been updated in relation to the revised layout presented in this SEI Report.

Design Constraints

- 2.10 In order to provide further context to the design rationale, a full constraints plan is provided as SEI Figure 2.2a showing the revised proposed turbine layout and all environmental constraints considered as part of the design evolution process. SEI Figure 2.2b is provided to show the revised layout against the traffic light constraints.
- 2.11 The ellipse spacing is also shown on **SEI Figure 2.2a** which has been used to make the most of the wind resource available, to protect the turbines from excessive wake induced turbulence and to enhance the generation potential of the site based on the detailed wind resource and energy assessment modelling which has been undertaken using the data collected from the meteorological mast installed on site.
- 2.12 The site is fortunate to have an exceptional wind resource with the prevailing wind direction from the south west and therefore has the potential to deliver some of the highest energy yield and associated capacity factor from a wind farm site in the UK. The number of turbines and spacing proposed aims to capture the maximum amount of wind energy possible whilst reducing array losses and respecting the environmental and technical conditions of the site.

Design Iterations and Consultation Process

- 2.13 As noted in **EIA Chapter 2 paragraph 2.79**, the design optimisation process was iterative, involving review of multiple turbine layouts and related wirelines from key landscape and visual receptor locations in the study area. The proposed turbine array was examined carefully from all key locations (with a focus on closer viewpoints) to ensure the composition of turbines was optimised as much as possible. Adjustment to turbine locations was undertaken to minimise potentially adverse landscape and visual impacts insofar as possible, whilst also taking into consideration the energy generation, particularly seeking to mitigate wake and array losses, and complying with other environmental, technical and economic considerations.
- 2.14 **Table 2-1 in EIA Chapter 2** provides details of six of the key design iterations of the turbine layouts considered for the Proposed Development (as shown on **EIA Figure 2.3**), however, it is worth noting that over 30 turbine layouts were considered as part of this iterative process over the three years of project development. The application turbine layout was proposed based on extensive and robust analysis of a large number of possible turbine layouts, as well as the feedback from THC following the design workshop held in July 2021.

Turbine Spacing

2.15 The ellipses shown on **SEI Figure 2.2a** show how the turbines have been carefully located to maximise their operational output without compromising the operation of other turbines. Any ellipses overlap should be avoided, maintaining the distance defined between the turbines in the prevailing wind direction (south west to north east) and in the direction perpendicular to the prevailing wind to mitigate losses and reduce the impact of



turbulence and wake effects on the downwind turbines, in compliance with the design parameters and turbine specifications.

2.16 The below image shows the wind rose that has been generated from the wind data collected onsite, demonstrating the strong prevailing south westerly wind direction experienced by the site. If the defined spacings between turbines are not respected then array issues would arise and may lead to operational curtailment with turbines needing to be shut down in certain wind conditions to protect the assets' integrity, which in turn impacts efficiency of the wind farm and energy output. Array issues may also affect the operational lifespan of the turbine and its components, increasing maintenance needs.

Wind Rose for the Balmeanach Site



Review of Turbines 3, 5 and 8

- 2.17 In response to THC's design queries raised at the meeting of 30 July 2024, further review was undertaken of the locations of T3, T5 and T8. The rationale for their location and retention is provided as follows:
 - Proposed turbines 3, 5 and 8 are located at slightly higher positions within the site. At an early stage in the design process the Applicant decided to restrict the proposed turbines to under 150m to blade tip height to ensure that the landscape and visual effects were minimised. Being under 150m to blade tip height, the proposed turbines would not require to be lit with visible aviation lighting. A landscape constraint (shown in purple) on SEI Figure 2.2a shows the key identified area which has been avoided in order to ensure that no turbines were located on the ridgeline. This area broadly relates to the 240m AOD contour within the site, with the ridgeline of Ben Sca and Ben Aketil being between approximately 260m AOD and 280m AOD. The approach taken was an early consideration in the design process and was determined by the initial project landscape advisor Caroline Stanton (who wrote the Landscape Character Assessment for Skye and Lochalsh and who now works for the Cairngorm National Park); as well as being consistent with the design advice provided by THC at the pre-application stage and the design workshop held in July 2021.
 - The ellipses show that any potential movement of these turbines to the east or south east would have a knock on effect on the location of the other turbines which are constrained to the east, particularly by deeper peat.



- THC note that the views from VP12 (Fiscavaig), VP14 (Totaig) and VP17 (Uig, Idrigill) are key views from which proposed turbines 3, 5 and 8 would be more prominent than the other turbines. It should be noted that all three viewpoints are located over 11km away from the proposed turbines (11.4km, 12.1km, and 17.3km respectively) so the turbines are seen as quite distant features in these views. The magnitude of change predicted for all three viewpoints (which are relevant for residents and road users) is slight and the residual effects are not predicted to be significant.
- VP12 (Fiscavaig) the wireline and photomontage from this viewpoint is presented as **SEI Figure 7.27 (SEI Volume 3c) and 7.47 (SEI Volume 3e)**. From this viewpoint, proposed turbines 3, 5 and 8 would be more prominent than proposed turbines 2, 4, 7 and 10 due to the landform screening lower parts of these turbines; but no more prominent than proposed turbines 6 and 9. It is submitted that any potential movement east or south east of proposed turbines 3, 5 or 8 would not result in any notable improvement to the composition or prominence of the wind farm from this location, however it would result in a decrease in efficiency and energy generation of the Proposed Development.
- VP14 (Totaig) the wireline and photomontage from this viewpoint is presented as **SEI Figure 7.29 (SEI Volume 3c) and 7.49 (SEI Volume 3e)**. From this viewpoint, proposed turbines 3, 5 and 8 would be slightly more prominent than the other proposed turbines. However, it should also be noted that the operational Ben Aketil turbines are positioned in front of the Proposed Development and any repowering of this site would likely result in taller wind turbines than the existing. The wirelines demonstrate this positioning in relation to the proposed Balmeanach turbines. It is submitted that any potential movement east or south east of proposed turbines 3, 5 or 8 would not result in any notable change to the composition of the proposed wind fam or reduction in effects on visual amenity, however it would result in a decrease in efficiency and energy generation of the Proposed Development.
- VP17 (Uig, Idrigill) the wireline and photomontage from this viewpoint is presented as **SEI Figure 7.32 (SEI Volume 3c) and 7.52 (SEI Volume 3e)**. Previously from this viewpoint, proposed turbine 1 (now removed) would have been seen to be slightly more prominent than the other proposed turbines. However, proposed turbines 3, 5 and 8 are set further back on the horizon. It is submitted that any potential movement east or south east of proposed turbines 3, 5 or 8 would not result in any notable improvement to the composition of the proposed wind farm or reduction in the effect on visual amenity at this location, however it would result in a decrease in efficiency and energy generation of the Proposed Development.

Summary and Commitments

- 2.18 The above therefore shows that the proposed locations of T3, T5 and T7 are unable to be moved at this current time without compromising the efficiency and energy generation of the Proposed Development. Any slight movements are not anticipated to result in any notable improvements to the composition of the Proposed Development or reduction in the effect on visual amenity.
- 2.19 The Applicant is committed to developing the most suitable and environmentally balanced layout for the wind farm site whilst contributing a significant amount of renewable energy generation to meet Scotland's ambitious targets. It is submitted that micrositing allowances of up to 50m may allow a slight improvement to the location of proposed T3, T5 and T8 during the pre-construction stage. The Applicant therefore proposes to further



assess and consider such potential gains during the pre-construction stage and prior to defining the final turbine locations.

Additional Survey Work

2.20 In order to address SEPA's concerns, an additional detailed Phase 2 peat survey of the site was undertaken in February 2024, which has informed the revised layout of the Proposed Development.

Design Changes

- 2.21 In order to address the consultee responses detailed in **Table 2-1**, the following key design changes have been made to the Proposed Development (from that set out in the EIA Report):
 - removal of Turbine 1 (T1), track to T1 and associated foundation and crane hardstanding to reduce predicted collision risk of white-tailed eagles and golden eagles (discussed further in **Chapter 9: Ornithology**);
 - amendments to track to reduce the length of track required, remove spurs and turning heads where possible and reorientate T4 and T5 crane hardstandings to reduce effects on peat (full details of the track and infrastructure changes are discussed in SEI Chapter 3: Description of the Development and SEI Chapter 10: Hydrology, Hydrogeology and Soils); and
 - addition of proposed link track and permanent construction compound to be part of the Proposed Development in the event that the consented Ben Sca Wind Farm does not get built.
- 2.22 THC has noted that the application for the Proposed Development should ensure that access can be achieved to the site, either via the consented Ben Sca Wind Farm track (the 'proposed link') or via the proposed Ben Sca Redesign Wind Farm track. The proposed link track is located fully within the application boundary and in the scenario where the consented Ben Sca Wind Farm does not get built, the proposed link track would be constructed as part of the Proposed Development. It is noted that the Ben Sca Redesign track route would be located outwith the application boundary for the Balmeanach Wind Farm, however, in the event that Ben Sca Redesign Wind Farm is approved, this track would be constructed under that consent and then used to access the Balmeanach Wind Farm (without any new works being undertaken on that route). An appropriate and full assessment is included in this SEI Report considering the use of both track options.
- 2.23 **SEI Figure 2.3a** shows the changes which have been made to the application turbine layout by removing T1. **SEI Figure 2.3b** shows the changes which have been made to the application infrastructure layout for this SEI Report.
- 2.24 The substation has also been relocated to within the area of Borrow Pit 3, to provide a closer connection route to the Grid Supply Point (GSP) at Edinbane. This also provides the benefit of reducing the use of additional undisturbed ground and a reduced visual impact of the control building due to its lower elevation (**SEI Figure 2.4**).
- 2.25 The OHMP (**SEI Technical Appendix 8.5**) has been updated to include additional peatland restoration which aims to meet NatureScot's guidance of 10 times the amount of peatland loss and aims to provide an additional 10% enhancement, as well as improving foraging habitat for eagles outside of the turbine area. A total 293.47ha has been



identified as being suitable for peatland restoration, which provides a restoration ratio in line with NatureScot guidance of 1:10 and 10.07ha of enhancement. Whilst the enhancement proposals fall slightly short of 10%, the proposals for habitat management have been greatly increased to those previously proposed and are considered appropriate on this site as the areas identified need to be balanced with the continued use of the common grazings land. Additionally, 19.15ha wet heath restoration is proposed to offset the loss of Annex 1 wet and dry heath communities and provide further enhancement.

Figures

- 2.26 **SEI Figure 3.1** shows the revised Proposed Development site layout.
- 2.27 The following figures are provided to show the location of the revised layout of the Proposed Development in relation to the design constraints considered:
 - SEI Figure 2.1: Environmental Designations
 - SEI Figure 2.2a: Design Constraints
 - SEI Figure 2.2b: Traffic Light Constraints
 - SEI Figure 2.3a: Turbine Layout Changes
 - SEI Figure 2.3b: Infrastructure Layout Changes
 - **SEI Figure 2.4:** Predicted Visibility of the Site from Balmeanach and Edinbane
- 2.28 The following updated figures which relate to the Peat Management Plan (PMP) **(EIA Technical Appendix 10.2)** should also be referred to as they show how the Proposed Development has been amended to reduce the effects on peat:
 - SEI Figure 10.2.3: Peat Depth
 - SEI Figure 10.2.4: Peat Depth >0.5m
 - SEI Figure 10.2.5a-j: Detailed Peat Depth Analysis for Turbines
- 2.29 The following updated figures which relate to the Peat Landslide and Hazard Risk Assessment (PLHRA) (**EIA Technical Appendix 10.1**) should also be referred to as they show how the revised layout of the Proposed Development relates to the slope and anticipated peat slide risk:
 - SEI Figure 10.1.8: Slope
 - SEI Figure 10.1.9: Peat Slide Risk
- 2.30 The changes to the design layout of the Proposed Development can be viewed in the updated wirelines and updated photomontages which are provided in **Volume 3b-e** in order to support **SEI Chapter 7: Landscape and Visual**.

