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Introduction

8.1 **Chapter 8: Ecology** of the Environmental Impact Assessment (EIA) Report which accompanied the application considered the potential ecological effects that could arise from the Proposed Development.

8.2 This Supplementary Environmental Information (SEI) Chapter supplements **EIA Chapter 8** and considers any change to ecological effects that would be caused by the revised layout of the Proposed Development, in comparison to the effects previously presented in **EIA Chapter 8**. The methodology employed in this SEI chapter is as set out in **EIA Chapter 8**.

8.3 The following key documents should be read in conjunction with this SEI chapter:

- **SEI Report Volume 2 – SEI Chapter 2: Site Design**.
- **SEI Report Volume 2 – SEI TA (TA) 8.5**: Outline Habitat Management Plan Update (OHMP);
- **EIA Report Volume 2 – Chapter 8: Ecology**;
- **EIA Report Volume 2 – Chapter 8: TAs 8.1** to **8.4** (with Figures updated as per **paragraph 8.9**);
- **SEI Report Volume 3f – Chapter 8: Figure 8.3**: Peatland Classification; and
- **SEI Report Volume 4 – SEI TA 8.5: Figure 8.5.1**: Habitat Management Areas.

Consultee Responses to EIA Report

8.4 **Table 8-1** provides a summary of the ecology related responses in relation to the application layout of the Proposed Development, received from key consultees. A response to the consultee comments is also provided.

Table 8-1: Consultee Responses

Consultee	Summary of Key Issues	Responses to Comments
The Highland Council (THC) **15 November 2024**	THC recommended that protected species/bird surveys of the proposed habitat management areas should be submitted prior to determination.	As shown on **SEI Figure 8.5.1**, some of the restoration areas lie within the revised application boundary, therefore these areas were surveyed to support **EIA Chapter 8** and **Ben Sca Redesign EIA Chapter 5**. All areas within the application boundary will be subject to pre-construction surveys as detailed in **paragraph 8.109** of **EIA Chapter 8**. See 'Additional Consultation' section below for further details. **Section 4.1** of **SEI TA8.5: OHMP Update** details surveys to be undertaken prior to restoration works, including protected species and bird surveys.
	THC advised that the proposed peatland restoration areas were insufficient to meet	The total area of proposed peatland restoration has been increased from

Consultee	Summary of Key Issues	Responses to Comments
	Peatland Code guidance, and that additional areas should be identified to ensure sufficient offsetting to meet the 1:10 offsetting ratio.	77.75ha to 293.47ha as per **paragraph 8.31**. Further details including justification of areas identified for restoration are presented in **SEI TA8.5: OHMP Update**.
	THC advised that the assessment of habitat loss does not meet Peatland Code guidance which considers peatland within 30m to be impacted rather than the 10m noted within the OHMP.	A 10m buffer was utilised (rather than 30m) due to erosion features (such as gullies) present within the peatland habitat next to proposed infrastructure. These gullies would therefore limit the potential for drying effects due to the works and therefore a 10m buffer is considered sufficient to reflect realistic drying effects on peatland in this area.
	THC advised that proposed peatland restoration did not satisfy the requirement of 10% enhancement of peatland as per NatureScot guidance, and therefore did not meet the requirements of National Planning Framework 4 (NPF4) Policy 3 to deliver significant enhancement. They recommended that additional enhancement opportunities were considered, including riparian planting along the Allt a Choire watercourse.	**Paragraph 8.52** details the enhancement proposed which includes 19.15ha of wet heath restoration. See **SEI TA8.5: OHMP Update** for full details. The Allt a Choire watercourse runs through the proposed peatland restoration area and therefore riparian planting has not been recommended due to its potential to reduce the impact of the peatland restoration works proposed through increased drainage causing degradation.
NatureScot **12 April 2024**	NatureScot advised that the extent of peatland restoration proposed falls short of guidance and recommended a revised outline Habitat Management Plan (OHMP) be submitted which includes additional areas of restoration.	The total area of proposed peatland restoration has been increased from 77.75ha to 293.47ha as per **paragraph 8.31**. Further details and justification are presented in **SEI TA 8.5: OHMP Update**.
	NatureScot stated that the current proposed peatland restoration area (77.75ha) is only three times of the area estimated to be lost (27.41ha) which does not align with guidance, which states that the restoration area should be ten times that which is lost, and as such are looking for restoration to be approximately 259.1ha if route A and A1 is used.	The total area of proposed peatland restoration has been increased from 77.75ha to 293.47ha as per **paragraph 8.31**. Further details and justification are presented in **SEI TA 8.5: OHMP Update**.
	NatureScot advised that in addition to restoration, an area of enhancement should be included, for example, 10% of the baseline blanket bog habitat.	**Paragraph 8.52** details the enhancement proposed which includes 19.15ha of wet heath restoration. See **SEI TA 8.5: OHMP Update** for full details.
	NatureScot advised that a revised Habitat Management Plan is provided which includes additional areas for restoration and that the updated plan should identify the current issues or damage within any areas to be restored with a clear	**SEI Figure 8.5.1** identifies additional areas selected for restoration. Following recovery after the fire in 2018 and consultation with peatland experts, potential habitat management areas were looked at in more detail and recent methods for peatland restoration that would be appropriate for the

Consultee	Summary of Key Issues	Responses to Comments
	identification of which are to be restored and what techniques are used.	habitats present. For full details see **Section 3.3** of **SEI TA8.5: OHMP Update.**
	NatureScot recommended that peatland restoration techniques follow the advice in the Peatland ACTION Technical Compendium.	**SEI TA 8.5: OHMP Update** details recommended methods for restoration, in line with advice contained within the Peatland ACTION Technical Compendium.
	NatureScot stated that it is not clear whether the Outline HMP will deliver enhancement, as it is primarily aimed at peatland restoration and falls short of their recommendations for enhancement.	**Paragraph 8.52** details the enhancement proposed which includes 19.15ha of wet heath restoration. See **SEI TA 8.5: OHMP Update** for full details.
	NatureScot noted that protected species surveys did not cover the proposed access route, or habitat management areas. They recommend that these areas including appropriate buffers, are surveyed and cover all aspects of the proposed development.	As shown on **SEI Figure 8.5.1**, some of the habitat management areas lie within the revised application boundary, therefore these areas were surveyed to support **EIA Chapter 8**. **Section 4.1** of **SEI TA8.5: OHMP Update** details recommended surveys to be undertaken prior to restoration works, including protected species and bird surveys.
	NatureScot recommended pitching the blades ('feathering') to reduce rotation speeds below 2rpm while idling in order to mitigate bat collision risk.	**Paragraph 8.28** states that feathering of blades will be implemented.
SEPA **18 December 2023**	SEPA advised that it is not clear how the quality of peatland has informed the layout, and request that plans be produced showing peatland quality, to demonstrate how the layout has avoided any areas of near natural habitat.	**SEI Figure 8.3** has been produced to show peatland condition. Design amendments to reduce the amount of peat lost are summarised in **paragraph 8.9** and detailed fully in **SEI Chapter 2**.
	SEPA advised that they encourage increasing the area of proposed restoration so that it aligns with NatureScot guidance.	The total area of proposed peatland restoration has been increased from 77.75ha to 293.47ha as per **paragraph 8.29**. Further details and justification are presented in **SEI TA 8.5: OHMP Update**.
RSPB **15 December 2023**	The RSPB stated that a revised OHMP should include actions to provide foraging habitat for white tailed eagle and golden eagle away from the turbine array. They suggest this could include searching for suitable habitat restoration areas across landholdings on which the wind farm is proposed, or further afield, and, grazing and/or burning management; further forest to bog restoration, and suitable native woodland creation, in order to increase prey abundance.	**Section 3.1.2** of the **SEI TA8.5: OHMP Update** states that the habitat management areas would provide foraging habitat for white tailed eagle and golden eagle away from the turbine array. Habitat management areas are shown on **Figure 8.5.1**.

Consultee	Summary of Key Issues	Responses to Comments
	The RSPB requested that the provision for deer carcass removal as stated in Section 9.172 of the EIAR is included in the OHMP.	The provision for deer carcass removal has been added to **Section 3.3.6** of **SEI TA8.5: OHMP Update.**
	The RSPB stated that the peatland restoration area needed to be significantly increased in order to provide the appropriate levels of compensation for Annex 1 habitat losses, and the significant biodiversity enhancement as required by Policy 3 of NPF4.	The total area of proposed peatland restoration has been increased from 77.75ha to 293.47ha as per **paragraph 8.31**. Further details and justification are presented in **SEI TA8.5: OHMP Update**.
	The RSPB noted that the OHMP stated that the deeply eroded peat and large haggs present near to the plateau between Ben Aketil and Ben Sca were not worth restoring and suggest this is reconsidered in the updated OHMP.	**SEI Figure 8.5.1** identifies additional areas selected for restoration, habitat management areas now include habitat present near to the plateau between Ben Aketil and Ben Sca.
	The RSPB stated that further opportunities for restoration should be sought outwith the red line boundary of the development in order to maximise the restoration required for compensation and enhancement.	**SEI Figure 8.5.1** identifies additional areas selected for restoration, habitat management areas includes areas outwith the red line boundary of the development but within the control of the Applicant.
	The RSPB stated that as the existing Ben Aketil wind farm track runs through the proposed restoration area and turbines are adjacent, that further suitable restoration areas should also be identified away from infrastructure in order to provide benefits to breeding and foraging birds.	**SEI Figure 8.5.1** shows habitat management areas and their location. These include further areas away from the Ben Aketil Wind Farm track.
	The RSPB stated that the OHMP contains conflicting information with regards to the restoration techniques to be used (specifically whether ground smoothing will take place). The RSPB recommended that ground smoothing takes place.	**SEI TA8.5: OHMP Update** is intended to be an outline document and contains recommendations for a range of restoration techniques that may be used, including ground smoothing. The detailed HMP, which will be produced post consent, will confirm the specific restoration techniques to be used.
	The RSPB noted that the OHMP states that fencing may be required to reduce grazing and allow regeneration of habitats within restoration areas. The RSPB stated that low level deer grazing may be required to manage tree regeneration and therefore recommended other ways of controlling grazing sheep are considered.	It is not thought that the provision of livestock fencing would impede deer access. Additionally, sitka spruce *Picea sitchensis*, are considered to be unpalatable to deer compared to other tree species, and one of the most resilient species to grazing (Scottish Forestry, n.d.) therefore deer grazing is unlikely to manage conifer regeneration in these areas.

Additional Consultation

8.5 Upon receipt of the consultee responses to the Balmeanach Wind Farm EIA Report, further consultation was undertaken with THC and NatureScot to discuss the requirement for habitat and protected species surveys within the habitat management areas.

8.6 All habitat management areas have been surveyed by the forestry contractor and visited by a habitat surveyor and their suitability for restoration was assessed. Areas where updated full habitat surveys have not been undertaken will be surveyed prior to works taking place.

8.7 In an email to Mark Fitzpatrick of THC (Scott, 2024a), it was confirmed that any further ecology surveys were unlikely to yield results that would influence the outcomes of the impact assessment, and on that basis, no additional surveys would be undertaken prior to determination. An email response from THC (Fitzpatrick, 2024) stated that the THC ecologist was in general agreement with this approach.

8.8 Following this, an email was sent to NatureScot (Scott, 2024b) providing an update of approach as agreed with THC. NatureScot responded in an email (Reid, 2024) acknowledging receipt and stating they did not plan to comment further on this point.

Design Amendments

8.9 The design amendments from the Proposed Development application layout (as detailed in the EIA Report) to the revised layout relevant to the ecological assessment are detailed in **SEI Chapter 2**, and include:

- removal of Turbine 1 (T1), the track to T1 and associated foundation and crane hardstanding;
- amendments to the track layout to reduce the length of track required, remove spurs and turning heads where possible and reorientate crane hardstandings to reduce effects on peat;
- the relocation of the substation to within the footprint of Borrow Pit 3;
- inclusion of proposed link track to be part of the Proposed Development in the event that the consented Ben Sca Wind Farm does not get built;
- addition of the permanent construction compound (Compound 1) to the south of the A850 to ensure that the proposed link track would be able to be built to the site (in the absence of the consented Ben Sca Wind Farm); and
- update of the Outline HMP in **SEI TA8.5: OHMP Update**.

Revised Figures

8.10 In order to update the graphic information previously issued with the EIA Report, a series of revised figures have been produced for the SEI, as follows, which supersede the corresponding EIA Figures:

- Figures which support **SEI Chapter 8** (superseding **EIA Figures 8.1** and **8.2**):
  - **SEI Figure 8.1**: Designated Sites and Ancient Woodland within 10km;
  - **SEI Figure 8.2a-f**: Historic areas of Peat with NVC; and
  - **SEI Figure 8.3**: Peatland Condition.

- Figures which support **EIA TA8.1: NVC and Habitat Survey** (superseding **EIA Figures 8.1.1-8.1.3**)
  - **SEI Figure 8.1.1**: Site Location and Survey Areas;
  - **SEI Figure 8.1.2a-h**: UK Habitat Classification; and
  - **SEI Figure 8.1.3a-h** National Vegetation Classification (NVC) Map.
- Figures which support **EIA TA8.2: Fish Habitat Assessment Report** (superseding **EIA Figure 8.2.1):**
  - **SEI Figure 8.2.1**: Survey Area and Target Note Locations.
- Figures which support **EIA TA8.3 Protected Mammal Survey Report** (superseding **EIA Figure 8.3.1):**
  - **SEI Figure 8.3.1: Mammal Survey Results.**
- Figures which support **EIA TA8.4 Bat Survey Report** (superseding **EIA Figure 8.4.1**):
  - **SEI Figure 8.4.1: Static Detector Locations.**
- Figures which support **SEI TA8.5: OHMP Update** (superseding **EIA Figure 8.5.1):**
  - **SEI Figure 8.5.1**: Habitat Management Areas.

Baseline Conditions

Habitats

8.11 As a result of the design amendments, specifically changes to the application boundary (see **SEI Chapter 2** for full details), the total areas of habitat loss referenced in **Table 8.8** of **EIA Chapter 8** are no longer accurate. Updated habitat calculations can be found in Table 8-2.

8.12 **SEI Figure 8.1.2a-g** and **SEI Figure 8.1.3a-g** shows the extent of the UKHab habitat survey and National Vegetation Classification (NVC) survey respectively, in relation to the revised layout. The baseline habitat information presented in **EIA Chapter 8** was collected in 2023 and still considered to be valid in line with the Chartered Institute of Ecologists and Environmental Managers guidance (CIEEM, 2019) given there are unlikely to have been significant changes to habitats present. It should be noted that despite the design changes, all wetland habitats within 250m of all proposed turbines and borrow pits and 100m of all other proposed infrastructure have been surveyed for potential GWDTE in line with SEPA guidelines (SEPA, 2024).

Fauna

8.13 The baseline conditions for faunal species presented within the **EIA Chapter 8** are considered to be still representative of baseline conditions on site as it is unlikely there have been significant changes to the habitats present and therefore the faunal species it supports. Pre-construction surveys, detailed in **paragraph 8.109** of **EIA Chapter 8** would be conducted to account for any changes and inform any additional mitigation required.

Assessment of Design Amendment Effects

8.14 The methodology of the ecological impact assessment is described in full in **EIA Chapter 8** and has been replicated to fully assess the ecological impacts of the design amendments.

Assessment of Construction Phase Impacts

Habitats

8.15 **EIA Report Chapters 2 and 3** includes proposed dimensions of all permanent and temporary features of the Proposed Development. Permanent features of the Proposed Development consist of turbines, met mast, crane pads, access tracks, substation and permanent compound (Compound 1). Temporary features consist of the construction compound (Compound 3) and borrow pits. These have been applied to the revised Proposed Development layout detailed in **SEI Chapters 2 and 3**.

8.16 Potential impacts are categorised as follows:

- direct habitat loss: this includes habitats present under the footprint of the Proposed Development, including access tracks, turbine areas, met mast, crane pads, substation, compounds and borrow pits.
- Indirect habitat loss: indirect habitat loss has been calculated for peatland habitats which lie within 10m of the direct habitat loss areas; the allowance of 10m is to allow for drying effects and vegetation changes due to construction works. For other habitats an allowance of temporary loss of 5m is included to allow for possible temporary loss due to damage during construction. Floating tracks would be considered conservatively in the same manner as other tracks; with a 10m buffer in blanket bog, though in reality the drying effect should be reduced.

8.17 For the purposes of the assessment a precautionary approach has been taken which assumed that direct habitat loss and indirect habitat loss of peatland habitat represents a permanent, irreversible negative effect, although in practice some areas indirectly affected may be able to be utilised as part of peatland restoration plans.

8.18 **Table 8-1** details the estimated direct and indirect/temporary habitat loss for habitats, including the design changes listed in **paragraph 8.9**, which includes the proposed link track (required in the absence of Ben Sca Wind Farm being built). This information supersedes that contained within **Table 8-8** of **EIA Chapter 8**. There are currently two onsite track options being considered for the Proposed Development (**SEI Figure 3.1a-b**), and therefore the potential habitat loss has been calculated for each potential track option: Option A and Option B (as described in **SEI Chapter 3**).

Table 8-2: Summary of Habitat Loss by UKHab/NVC Community Type

UK Hab Type	NVC Community	Direct Habitat Loss (ha)	Infrastructure causing Direct Habitat Loss	Indirect or Temporary Habitat Loss (ha)	Infrastructure causing Indirect/Temporary Habitat Loss (ha)	Total Loss (ha)
Track Option A						
Blanket Bog (f1a5) –	M17	8.95	Access track, Borrow pit, Permanent crane	15.01	Access Track, Borrow pit, Temporary construction	23.96

UK Hab Type	NVC Community	Direct Habitat Loss (ha)	Infrastructure causing Direct Habitat Loss	Indirect or Temporary Habitat Loss (ha)	Infrastructure causing Indirect/Temporary Habitat Loss (ha)	Total Loss (ha)
Annex 1 (H7130)			hardstanding, Turning head, Substation, met mast hardstanding		compound 3, Temporary crane hardstanding, Permanent crane hardstanding, Turning head, met mast hardstanding	
	M19	0.54	Access track, Permanent crane hardstanding, met mast hardstanding	1.18	Access Track, Temporary crane hardstanding, Permanent crane hardstanding, met mast hardstanding	1.72
	M19/M1	0.87	Access track, borrow pit, permanent crane hardstanding, turning head	1.37	Access Track, Borrow pit, Temporary crane hardstanding, Permanent crane hardstanding, Turning head	2.24
Degraded Blanket Bog (f1a6)	M15-M19	0.23	Access track, Permanent crane hardstanding	0.16	Access Track, Borrow pit, Temporary crane hardstanding, Permanent crane hardstanding	0.39
	M15/M1	0.01	Access Track	0.02	Access track	0.03
Dry Heath/Acid Grassland g1b6/h1b5) – Annex 1 (H4030)	U5/U6/H14	1.37	Access track, Borrow pit	1.19	Access Track, Borrow pit, Temporary construction compound 3	2.56
Dry Heath (h1b5) – Annex 1 (H4030)	H14	0.00	N/A	0.02	Construction compound	0.02
Wet Heath (h1b6) – Annex 1 (H4010)*	M15	1.95	Access track, Borrow pit, Turning head	2.20	Access Track, Borrow pit, Temporary construction compound 3, Temporary crane hardstanding, Turning head	4.15
Acid Grassland (g1b)	U4	0.03	Access Track	0.03	Access track	0.06
Conifer Plantation	-	0.37	Permanent construction compound 1	0.22	Access Track, Construction Compound,	0.59

UK Hab Type	NVC Community	Direct Habitat Loss (ha)	Infrastructure causing Direct Habitat Loss	Indirect or Temporary Habitat Loss (ha)	Infrastructure causing Indirect/Temporary Habitat Loss (ha)	Total Loss (ha)
					Permanent construction compound 1	
Total		**13.94**		**21.78**		**35.72**
Track Option B						
Blanket Bog (f1a5) – Annex 1 (H7130)	M17	9.19	Access track, Borrow pit, Permanent crane hardstanding, Turning head, Substation	16.07	Access Track, Borrow pit, Temporary construction compound 3, Temporary crane hardstanding, Permanent crane hardstanding, Turning head	25.26
	M19	0.77	Access track, Permanent crane hardstanding	1.91	Access Track, Temporary crane hardstanding, Permanent crane hardstanding	2.68
	M19/M1	0.87	Access track, Borrow pit, Permanent crane hardstanding, Turning head	1.39	Access Track, Borrow pit, Temporary crane hardstanding, Permanent crane hardstanding, Turning head	2.26
Degraded Blanket Bog (f1a6)	M15-M19	0.23	Access track, Permanent crane hardstanding	0.16	Access Track, Borrow pit, Temporary crane hardstanding, Permanent crane hardstanding	0.39
	M15/M1	0.01	Access track	0.02	Access track	0.03
Dry Heath/Acid Grassland (g1b6/h1b5) – Annex 1 (H4030)	U5/U6/H14	1.42	Access track, Borrow pit	1.28	Access Track, Borrow pit, Temporary construction compound 3	2.70
Dry Heath (h1b5) – Annex 1 (H4030)	H14	0.00	NA	0.02	Access track, Temporary construction compound 3	0.02
Wet Heath (h1b6) – Annex 1 (H4010)*	M15	1.80	Access track, Borrow pit, Turning head	1.97	Access Track, Borrow pit, Temporary construction compound 3, Temporary crane	3.77

UK Hab Type	NVC Community	Direct Habitat Loss (ha)	Infrastructure causing Direct Habitat Loss	Indirect or Temporary Habitat Loss (ha)	Infrastructure causing Indirect/Temporary Habitat Loss (ha)	Total Loss (ha)
					hardstanding, Turning head	
Acid Grassland (g1b)	U4	0.03	Access Track	0.03	Access track	0.06
Conifer Plantation	-	0.37	Permanent construction compound 1	0.22	Access Track, Construction Compound, Permanent construction compound 1	0.59
Total		**14.31**		**23.44**		**37.75**
Communities marked with a '' are potential GWDTE communities*						

8.19 The revised layout of the Proposed Development would result in the potential maximum loss of habitat as follows:

- Annex 1 blanket bog communities (M17 and M19 mire and M1 bog pool community); direct loss of 10.83ha and indirect loss of 19.37ha (if track Option B was constructed).
- degraded blanket bog: direct loss of 0.24ha and indirect loss of 0.18ha (for both track options);
- Annex 1 dry heath (H14) including dry heath mosaic (U5/U6/H14): 1.42ha direct loss and an indirect loss of 1.30ha (if track Option B was constructed); and
- Annex 1 wet heath (M15): direct loss of 1.95ha and indirect loss of 2.2ha (if track Option A was constructed).

8.20 The maximum potential direct and indirect loss of 30.62ha of regionally important Annex 1 blanket bog (in the case of track Option B) is considered to constitute a significant negative effect at a regional level. Given the alternative track Option A results in a total loss of 28.34ha, both track options are considered to result in a significant negative effect at a regional level (as was the case for the application layout).

8.21 The total loss of 2.72ha locally important Annex 1 dry heath habitat (if track Option B was constructed) is considered to constitute a significant negative effect at a local level (as was the case for the application layout). Given the alternative track Option A would result in a loss of 2.58ha, both track options are considered to result in a significant negative effect at a local level (as was the case for the application layout).

8.22 The total loss of 4.15ha of locally important Annex 1 wet heath habitat (if track Option A was constructed) is considered to constitute a significant negative effect at a local level (as was the case for the application layout). Given the alternative track Option B results in a loss of 3.77ha, both track options are considered to result in a significant negative effect at a local level (as was the case for the application layout).

8.23 The small-scale loss of acid grassland and conifer plantation habitats (for both track Options A and B) is considered to be not significant, given the scale and the ubiquitous nature of the habitats in the landscape. This is consistent with the predicted effects of the application layout.

8.24 **EIA Chapter 8** and **SEI TA8.5: OHMP Update** detail the mitigation and habitat restoration measures proposed to offset the significant negative effects described in **paragraphs 8.20** to **8.23**. A summary of habitat restoration amounts is provided in **paragraphs 8.30** to **8.32**.

Fauna

8.25 Effects during the construction phase on protected fauna (considered to be fish, reptiles, otter *Lutra lutra,* bats and deer) would not change as a result of the amendments to the design. No significant effects are considered likely to these species as a result of either direct or indirect impacts due to the revised layout of the Proposed Development.

Assessment of Operational Phase Impacts

Habitats

8.26 Effects during the operational phase on habitats would not change as a result of the amendments to the design. No significant effects are predicted (as was the case for the application layout).

Fauna

8.27 Effects during the operational phase on protected fauna (bats and those listed in **paragraph 8.25**) would not change as a result of the amendments to the design. No significant effects are predicted (as was the case for the application layout).

8.28 Although no significant effects on bats were predicted, turbine blades will be pitched ‘feathered’ to further reduce any potential collision risk.

Amendments to Outline Habitat Management Plan

8.29 **SEI TA8.5: OHMP Update** sets out the updated goals and objectives of the OHMP, details recommended restoration methods and includes recommendations for monitoring.

8.30 The proposed peatland restoration areas were updated with the aim to meet current NatureScot guidance (NatureScot, 2023), which recommends a peatland restoration area of 10 times the area lost (283.4ha track Option A, 306.2ha track Option B)), plus an enhancement area of 10% the area of peatland recorded on site (31ha). The total requirement for peatland restoration and enhancement for the Proposed Development is therefore 314.4ha (track Option A) or 337.2ha (track Option B).

8.31 The proposed areas of peatland restoration (as shown on **SEI Figure 8.5.1**) totals 293.47ha, which provides a restoration ratio in line with NatureScot guidance of 1:10.

8.32 Additionally, 19.15ha wet heath restoration is proposed to offset the potential maximum loss of 6.73ha Annex 1 wet and dry heath communities and provide additional enhancement.

8.33 **Section 3** of **SEI TA8.5: OHMP Update** details the updated goals and objectives to meet the restoration aims detailed in **paragraphs 8.30** and **8.32**. The updated goals are as follows:

- to create a 74.28ha area of wet heath/blanket bog via forest to bog peatland restoration;
- to restore a 195.85ha area of blanket bog via gully blocking and micro erosion stabilisation;
- to restore 18.52ha of blanket bog via drain blocking;
- to stabilise and re-vegetate 4.82ha of bare peat;
- to enhance 19.15ha of wet heath; and
- within 30 years, to have created hydrological conditions suitable for the development and maintenance of carbon sequestering bog/wet heath habitats that are largely self-sustaining, therefore making a significant contribution to the restoration of this habitat type at the local level.

8.34 **Section 3.3** of **SEI TA8.5: OHMP Update** contains details of the rationale behind the identification of habitat management areas (**SEI Figure 8.5.1**) and the current issues or damage within these areas.

Cumulative Development Update

Cumulative Baseline

8.35 As outlined in **SEI Chapter 5: EIA**, since the submission of the application for the Proposed Development, there have been some changes to the context of other wind farm developments in proximity to the site. **Table 5-1** in **SEI Chapter 5** summarises the updated cumulative dataset.

8.36 As in **EIA Chapter 8**, for the purposes of the assessment of potential cumulative effects, the following receptors have been assessed:

- cumulative effects on aquatic receptors within the same sub-catchment and within 5km; and
- cumulative effects on bat populations, which are possible in combination with wind farms within a 10km radius.

8.37 **Table 8-7** in **EIA Chapter 8** details the projects considered in the cumulative impact assessment undertaken for the application. The additional projects considered within this impact assessment (including all developments within the relevant study areas which are either operational, under construction, consented or for which a planning application has been submitted) are:

- Ben Sca Redesign Wind Farm (revised layout) [would replace consented Ben Sca Wind Farm and Ben Sca Wind Farm Extension];
- Ben Aketil Repowering and Extension [would replace existing operational Ben Aketil Wind Farm];
- Glen Ullinish II Wind Farm (Redesign) [would replace consented Glen Ullinish II Wind Farm); and

- Beinn Mheadhonach Redesign [would replace consented Beinn Mheadhonach Wind Farm].

8.38 The following proposed wind farms were not included in the assessment within this chapter as no planning application has been submitted, and therefore there is insufficient information available in order to assess cumulative effects:

- Edinbane Repowering and Extension; and
- Edinbane – Land at 4 Edinbane.

Cumulative Effects

8.39 **SEI Volume 5 Section 4** provides full details of the combined effects on terrestrial (non-avian) ecological receptors associated with the construction of the Proposed Development alongside Ben Sca Redesign Wind Farm.

8.40 In summary, no significant negative combined effects are predicted, over and above the significant effects for each scheme when considered alone. A significant positive combined effect on habitats is predicted due to the connectivity of the proposed habitat management areas for both developments.

Construction Phase

8.41 Cumulative effects during construction for all the wind farms listed in **paragraph 8.37** have been assessed under the assumption that all projects would be constructed concurrently.

8.42 For cumulative effects on aquatic receptors during construction, the only potential for significant cumulative effects would be via the discharge of particulate matter into watercourses, through a pollution incident. Wind farms which are already operational are not likely to give rise to significant cumulative effects and therefore the assessment has been restricted to those yet to be constructed.

8.43 It is assumed that the developments within the same catchment would be constructed and managed in line with current best practice, industry standard and relevant legislation. These standards seek to ensure that potential impacts on the water environment are mitigated and controlled at source. Given the stand-off distance from watercourses of 50m for all infrastructure associated with the Proposed Development and the embedded mitigation measures that would be implemented (see **EIA Chapter 10: Hydrology, Hydrogeology and Soils** and **SEI Chapter 10: Hydrology and Peat**), significant cumulative effects are not likely for watercourses or the fauna that use them.

8.44 No additional cumulative effects during construction are predicted for all other ecological receptors.

Operational Phase

8.45 Low numbers of common pipistrelle *Pipistrellus pipistrellus* and noctule *Nyctalus noctula* bats were recorded during surveys for Ben Aketil Repowering and Extension to the west of the site, the associated EIA concluded no significant effects likely during operation. Bat surveys to support the application for Glen Ullinish II recorded low numbers of common pipistrelle, soprano pipistrelle *Pipistrellus pygmaeus* and brown long eared bats *Plecotus auritus* and the associated EIA concluded no significant effects on bats due to collision risk. No bat data was available for Beinn Mheadhonach Wind Farm however the potential for significant effects on bats were scoped out of assessment.

8.46 Considering the fact that, if consented, Ben Aketil Repowering and Extension and Glen Ullinish II Redesign would replace the operational Ben Aketil Wind Farm and the consented Glen Ullinish Wind Farm respectively, the assessment of cumulative effects within **EIA Chapter 8** that concluded no significant cumulative effects likely remains unchanged.

8.47 No additional cumulative effects during operation are predicted for all other ecological receptors.

Summary of Changes to the Significance of Effects

8.48 As a result of the changes to the Proposed Development there would be no changes to the significance of effects as assessed and presented in **EIA Chapter 8**.

Conclusions

8.49 This chapter has reviewed the responses from consultees, providing additional information as requested where necessary, and clarifying a number of concerns.

8.50 It has also reviewed the changes to the layout of the Proposed Development and described how these would have no change on the assessment of significant effects of the Proposed Development on ecological receptors.

8.51 In summary, the area of proposed peatland restoration has increased from 77.5ha to 293.47ha, which has increased the peatland restoration ratio in line with NatureScot's guidance of 1:10. This is a significant increase when compared with the original ratio of under 1:3.

8.52 Enhancement is provided by 19.15ha of proposed wet heath restoration. Additionally, 74.28ha of restoration proposed is forest to bog, which represents a significant benefit given the relatively low value of the habitat in its current state (conifer plantation).

8.53 It should also be noted that the proposed habitat management areas would be additional to those proposed for the Ben Sca Redesign Wind Farm, and are situated next to each other, which would provide further enhancement benefits due to the connectivity of habitat. The combined peatland restoration areas (for Balmeanach and Ben Sca Redesign together) would deliver 1:10 peatland restoration along with between 13% and 18% of enhancement, exceeding the aims of NatureScot's guidance. See **SEI Volume 5 Section 4** and **SEI Volume 5 Appendix A** for full details.

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