



Clachaig Glen Wind Farm

Environmental Impact Assessment Report

Volume 2a

Main Report

Chapter 5: Summary of Consultation

5 Summary of Consultation

5.1 Introduction

5.1.1 This chapter of the Environmental Impact Assessment Report (EIAR) provides an overview of the formal and informal consultation processes that have shaped the structure and focus of the Environmental Impact Assessment (EIA) for the Proposed Development. This has comprised three key stages: EIA Scoping, post-Scoping consultation with Argyll and Bute Council and NatureScot, and the Scottish Government Energy Consents Unit (ECU) Gatecheck process (see Section 5.2).

5.1.2 The chapter is supported by the following Appendices (found in EIAR Volume 3):

- Appendix 5.1: Clachaig Glen Wind Farm EIA Scoping Report,
- Appendix 5.2: EIA Scoping Opinion, and
- Appendix 5.3: Responses to Section 36 Gatecheck.

5.1.3 Detail on the wider pre-application consultation and engagement programme which has been undertaken to inform the design of the Proposed Development, from the initial project conception to the present finalised design, is not addressed through this chapter. This is instead summarised within the Pre-Application Consultation Report, a separate document accompanying the Section 36 Application.

5.2 Three Key Consultation Stages for EIA

EIA Scoping

5.2.1 The Clachaig Glen Wind Farm Section 36 Scoping Report (Appendix 5.1; EIAR Volume 3) was submitted to the ECU in July 2020, with the Scoping Opinion (Appendix 5.2; EIAR Volume 3) received in October 2020.

5.2.2 Under section 12(1) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended), the request for a Scoping Opinion is optional; however, as per section 5(3), once adopted, this EIAR must be based on that Scoping Opinion.

5.2.3 The EIA Scoping Opinion has therefore had a large influence on the structure and focus of the EIA for the Proposed Development, with post-Scoping consultation and the ECU Gatecheck process working to build on the Scoping Opinion where it has been necessary to confirm further details or request feedback.

5.2.4 Section 5.3 summarises the key responses contained within the Scoping Opinion from each consultee and provides a signpost to where the information can be found within this EIAR or the Applicant's response.

Post-Scoping Consultation

- 5.2.5 Post-Scoping consultation with Argyll and Bute Council and NatureScot has largely focussed on the areas of landscape and visual impact and aviation lighting. As well as seeking feedback on design changes (see Design Statement, a separate report which accompanies the Section 36 Application), this consultation has also helped to establish assessment parameters for the EIA which is the focus for this chapter.
- 5.2.6 These assessment parameters include agreement on the proposed viewpoints for the Landscape and Visual Impact Assessment (LVIA), as well as the scope of cumulative assessment and possible mitigation for the aviation lighting assessment. These are summarised in Section 5.3.

ECU Gatecheck

- 5.2.7 A Gatecheck Report was submitted to the ECU by AECOM on behalf of the Applicant on 23 July 2021. This provided an update on how the consultation undertaken to that point had been incorporated into the design process, and also outlined how the issues and responses raised in the Scoping Opinion would be addressed in this EIAR. The report was submitted by the ECU to all consultees who had contributed to the Scoping Opinion in order to identify whether there were any concerns over what was being proposed.
- 5.2.8 Where a consultee raised an issue, it has been referenced in Section 5.3.

5.3 Consultation Summary

5.3.1 This section of the chapter summarises the key responses received through the consultation detailed in Section 5.2. Each consultee is addressed in turn.

Argyll and Bute Council

5.3.2 The key points raised by Argyll and Bute Council which have influenced the structure and focus of this EIAR are set out in Table 5-1.

Table 5-1 Key Points Raised by Argyll and Bute Council

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>Landscape and Visual Impact: The Council recommends that additional viewpoints are provided from:</p> <ul style="list-style-type: none"> • Dun Skeig, Scheduled Monument, and • A'Cleit, Category A listed building. <p>The Council also recommends that consideration is given to the production of some comparative wirelines and photomontages which display the difference between the Consented Development and the Proposed Development to assist in the understanding of the difference between the two schemes in terms of Landscape and Visual Impact.</p>	<p>Chapters 7 (Landscape and Visual) and 12 (Cultural Heritage) of this EIAR address these requests.</p>
Scoping	<p>Air quality: The applicants should consider the potential for dust emissions from the site and access roads / tracks during the construction phase on any nearby sensitive properties and provide details of any proposed mitigation measures within a Construction Environment Management Plan (CEMP).</p>	<p>A CEMP will be prepared following receipt of planning permission and prior to site works and will include details on good practice construction techniques to minimise dust emissions.</p>
Scoping	<p>Lighting: Lighting during construction phase would be of concern on any nearby sensitive properties.</p>	<p>A CEMP will be prepared following receipt of planning permission and prior to site works and will include details on proposed lighting and any mitigation if necessary.</p>
Scoping	<p>Ecology: The Council's Local Biodiversity Officer (LBO) advises:</p> <ul style="list-style-type: none"> • A Peat Management Plan for both the construction and decommissioning phases needs to be included in the proposed CEMP which is to be overseen by an Ecological Clerk of Works, 	<p>A number of surveys have been updated, are referenced in Chapters 9 (Ecology), 10 (Ornithology) and 11 (Geology, Hydrology and Hydrogeology) of this EIAR. This includes detail on any proposed mitigation, compensation and enhancement measures.</p>

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	<ul style="list-style-type: none"> Notes that the design of watercourse crossings will be passable to fish, otter and water vole, details must include silt catchment and culvert maintenance, all details to be included in the CEMP, This proposal has been subject to a series of ecological, ornithological and hydrological surveys, some of which require updating as they are past the 18-month timescale, The proposed mitigation in the current surveys is in line with accepted practice, this needs to be included in the Habitat Management Plan (HMP) management plans and form part of the CEMP, The LBO welcomes the proposed mitigation and inclusion of compensatory measures and ecological enhancement, and notes that these have to be fully explored and measures designed to restore specific areas within the proposed site, these measures should form part of the HMP. The LBO would like a copy of same when it becomes available and recommend that these are included in the CEMP along with Toolbox talks, the latter to include a watching brief on protected species. 	<p>As referenced previously, a CEMP will be prepared following receipt of planning permission and prior to site works. This will include plans and details as requested.</p>
<p>Scoping</p>	<p>Borrow pits: There is an outstanding issue relating to the location of the borrow pits and passing places, the LBO requires further information on the final location of the borrow pits and passing places along with details of the treatment and storage of the vegetative cover and soil to be used in the restoration plan. It should be confirmed what habitats will be affected by the excavation process.</p> <p>A Borrow Pit and Passing Place Management Plan will need to be drafted with a focus on the treatment of surface vegetation (turves) and soil, a restoration plan will need to be included for the borrow pits and appropriate passing places where applicable.</p>	<p>The location of borrow pits and passing places are confirmed through Chapter 3 (Project Description) of this EIAR and associated drawings. The EIA, including these features, has been based on the design of the Proposed Development and so Chapter 9 (Ecology) confirms what habitats will be affected.</p> <p>A restoration plan will be prepared following receipt of planning permission and prior to site works.</p>
<p>Scoping</p>	<p>Private Water Supplies: The Council's Environmental Protection Officer has advised that the Proposed Development is in an area where residential properties are served by private water supplies. The applicants should identify all properties served by a private water supply, to determine the source of those supplies that may be affected (e.g. surface supply, borehole etc.) and, where appropriate, should outline the proposed measures to avoid causing contamination during the construction and operational phases.</p> <p>Where a private water supply is to be provided at the construction site or any facilities in use during the operational phase (for drinking water, toilets etc.) details of the source of this supply and any proposed treatment should be outlined (the</p>	<p>Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR reports on private water supplies.</p>

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	supply will be required to meet the standard of the Water Intended for Human Consumption (Private Supplies) (Scotland) Regulations 2017).	
Scoping	<p>Cultural heritage: The West of Scotland Archaeology Service (WoSAS) have advised:</p> <ul style="list-style-type: none"> • Including pre and/or post-felling walkover survey or a sufficiently detailed LiDAR survey as possible alternatives as to how the applicant might address unrecorded sites, • A 10km extent for setting assessments but given the size of the turbines this may need to be increased. <p>The Council would also ask that consideration is given in any replanting plan and access/turning area design for provision of appropriate new planting to protect and maintain the setting of the Category A listed 'Dolls houses', which lie adjacent to said access.</p> <p>Furthermore, it is understood that consultation with Historic Environment Scotland (HES) and WoSAS will also be undertaken in regard to this area of the assessment.</p>	<p>Detailed walkover surveys of the forested areas will form the initial phase of a package of mitigation works. This will be agreed with WoSAS prior to site works commencing.</p> <p>Details of the setting assessment undertaken are provided in Chapter 12 (Cultural Heritage) of this EIAR.</p> <p>Planting and/or other mitigation measures developed to mitigate potential impacts on the setting of the Category A listed 'Dolls Houses' are also discussed in Chapter 12 of this EIAR. The 'Dolls Houses' are also discussed as part of the impact assessment within the same chapter.</p>
Scoping	<p>Traffic, transport and access: Construction of the Proposed Development is expected to result in the highest volume of traffic generation, therefore it is proposed that operational and decommissioning transport impacts are scoped out of the EIA and that the justification for scoping out these phases would be further detailed within this chapter.</p>	<p>Chapter 14 (Traffic, Transport and Access) of this EIAR focuses on this assessment.</p> <p>During the operation of the Proposed Development, any necessary inspections or maintenance activities are not expected to generate a large number of vehicular trips.</p> <p>Decommissioning will more closely follow the construction impact, though without the need for abnormal loads as turbine components can be deconstructed on site into smaller sections.</p> <p>This EIAR therefore focuses on construction impacts.</p>
Scoping	<p>Grid connection: It is normal for general information on the route of the grid connection to be set out in this EIAR.</p>	<p>The EIAR provides information on the reasonably foreseeable grid connection route.</p>
Post-Scoping	<p>Agreement on proposed viewpoints to be used within LVIA.</p>	<p>The viewpoints agreed are set out in detail in Chapter 7 (Landscape and Visual) of this EIAR.</p>
Post-Scoping	<p>It was requested that a form of aviation lighting mitigation called Electronic Conspicuity Aircraft Detection Lighting System should be considered.</p>	<p>Further detail on this is provided in Chapter 16 (Aviation) of this EIAR, which was written by the applicant's aviation consultant, Wind Power Aviation Consultants Ltd., (WPAC) who have extensive experience in aviation service provision, regulation, lighting and low flying aircraft</p>

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
		<p>operations. In summary, while the Civil Aviation Authority (CAA) advise that this mitigation is technically feasible, the regulatory actions requiring aircraft to carry a compatible system have not yet been completed, signed into law or the coverage requirements agreed. Such systems cannot therefore yet be authorised for use.</p> <p>However, this may be completed within the next five years and if that were the case, in line with the advice from NatureScot, the Applicant proposes a planning condition in order that, if / when this mitigation, or a suitable alternative, is developed that would be acceptable to the CAA, it will be implemented, otherwise aviation lighting will be used until this time</p>

Campbeltown Community Council

5.3.3 The key points raised by Campbeltown Community Council which have influenced the structure and focus of this EIAR are set out in Table 5-2.

Table 5-2 Key Points Raised by Campbeltown Community Council

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
Scoping	It would appear that the increased height of the turbines in the Proposed Development would require night-time lighting. This would impact on Kintyre’s designation as a “Dark Sky Discovery Site” and on potential tourism. Lighting should be kept to a minimum.	Consultation with NatureScot and Argyll and Bute Council has taken place since the Scoping Opinion was issued and the results of the aviation lighting assessment as agreed are reported in Chapter 7 (Landscape and Visual) of this EIAR.
Scoping	There are significant numbers of heritage assets, standing stones with cup and ring markings, Cairns and at least one dun dating back to the 5th Century. These could be damaged during construction and others not known about could be destroyed. Care must be taken to protect these.	These features have been considered throughout the design development of the Proposed Development, and an assessment of effects are presented in Chapter 12 (Cultural Heritage) of this EIAR.
Scoping	One of the relatively few areas of natural broadleaved woodland in Kintyre is in Clachaig Glen. Loss or damage to this area could have considerable impact on wildlife and so again this area requires protection.	There will be no direct loss to any broadleaved woodland in Clachaig Glen, all of which is well outside the construction footprint. Chapter 9 (Ecology) of this EIAR demonstrates this. Standard pollution controls which would be secured via the CEMP, including silt measures, would

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>By far the greatest problem for the community of Campbeltown would be in the construction phase when locals could be delayed by movement of hazardous loads. Movements at night can cause disruptions due to noise and vibrations. These should be kept to a minimum.</p>	<p>be implemented during construction, which are expected to avoid damage to downstream woodland.</p> <p>This has been noted for transfer into the CEMP. Working at night is not anticipated with the construction of the Proposed Development, as is referenced in Chapter 14 (Traffic, Transport and Access) of this EIAR.</p>

Historic Environment Scotland

5.3.4 The key points raised by Historic Environment Scotland which have influenced the structure and focus of this EIAR are set out in Table 5-3

Table 5-3 Key Points Raised by Historic Environment Scotland

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>Scheduled Monuments:</p> <ul style="list-style-type: none"> • Low Clachaig, cup marked boulders 915m E of (SM4352)), • North Beachmore, rock art panel 220m E, 350m E and 385m ESE of (SM13295), • Dunan Muasdale, dun (SM3223), • Killean,fort NE of (SM3179), • St John's Church, church, burial ground and carved stones, Killean (SM3030), <p>A-Listed Buildings:</p> <ul style="list-style-type: none"> • Killean, the "Dolls' Houses" (LB43266), • Killean House (LB12005). <p>This list is not exhaustive, and we would recommend that the Zone of Theoretical Visibility (ZTV) analysis you provided with this Scoping Report is used to identify the assets for assessment.</p> <p>We recommend that this assessment is supported by visualisations such as photomontage and wireframe views where visual impacts are likely to be highest.</p>	<p>This has been taken into account and assessment results are reported in Chapters 7 (Landscape and Visual) and 12 (Cultural heritage) of this EIAR.</p>

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	<p>This is likely to include visualisations of the windfarm proposals in views to and from the heritage assets identified above.</p> <p>We also suggest that any cumulative impacts resulting from this development in combination with other existing and proposed developments within the surrounding area should be carefully considered.</p>	
Scoping	<p>We also recommend that the section on Mitigation Measures be amended. This section notes that mitigation may include design interventions to avoid physical impacts. However, it does not acknowledge that design interventions may also be required to avoid or reduce impacts on the settings of assets.</p>	<p>The methodology of Chapter 12 (Cultural Heritage) of this EIAR has been altered to reflect this.</p>
Scoping	<p>Assets for our interest within and outside the ZTV up to at least 10km from the Proposed Development should be appraised for potential impacts on their settings. It is acceptable that assets which have no potential for adverse impacts on their settings are then excluded from detailed assessment. However, the rationale for this exclusion should be set out clearly in the assessment report. This would allow stakeholders to reach a view as to whether an asset's exclusion was reasonable or not.</p>	<p>This has been taken into account and has been reported on in Chapter 12 (Cultural Heritage) of this EIAR.</p>
Scoping	<p>This is likely to require a site visit and, in some cases, production of visualisations. Both are likely to be required for several monuments in proximity to the Proposed Development, such as Dunan Muasdale, dun (SM3223) and Low Clachaig, cup marked boulders 915m I of (SM4352).</p>	<p>This has been taken into account and is reported on in Chapter 12 (Cultural Heritage) of this EIAR.</p>

Highlands & Islands Airport

5.3.5 The key points raised by Highlands & Islands Airport which have influenced the structure and focus of this EIAR are set out in Table 5-4

Table 5-4 Key Points Raised by Highlands & Islands Airport

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>HIAL would require a flight procedure assessment to demonstrate that the Instrument Flight Procedures (IFPs) will not be impacted by the Proposed Development. Please note this assessment can only be conducted by, and accepted from, an Approved Procedure Design Organisation, as approved by the CAA.</p>	<p>An IFP Report was produced and provided to HIAL on 21 September 2020. It has been confirmed by Cyrrus that the Proposed Development will not affect the outcome of this 2020 report.</p>

Marine Scotland Science

5.3.6 The key points raised by Marine Scotland Science which have influenced the structure and focus of this EIAR are set out in Table 5-5

Table 5-5 Key Points Raised by Marine Scotland Science

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>Marine Scotland Science will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations</p>	<p>A checklist was completed at Gatecheck stage for Marine Scotland Science. This referred to Chapter 9 (Ecology), Chapter 11 (Geology, Hydrology and Hydrogeology) and Chapter 17 (Forestry) of this EIAR.</p>

NatureScot

5.3.7 The key points raised by NatureScot which have influenced the structure and focus of this EIAR are set out in Table 5-6

Table 5-6 Key Points Raised by NatureScot

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	Landscape and Visual: We advise that the applicant may wish to explore a reduction in scale (both height and number of turbines), to address the landscape and visual sensitivities (informed by the Landscape Wind Energy Capacity Study (LWECS)), minimising cumulative effects with the adjacent wind farms, and avoiding the adverse effects of lighting as part of the iterative design process.	NatureScot has been further consulted in regard to this, however it is understood their position regarding the height and number of turbines is unchanged. Whilst other feedback regarding the design of the development, such as its layout, have resulted in changes to the design of the Proposed Development, the height and number of turbines have not been reduced. This EIAR reviews the need for the project in relation to Reasonable Alternatives (Chapter 4) and the Planning Statement, which is a separate document accompanying the Section 36 Application, explores the need for the Proposed Development in the wider strategic context. Chapter 7 (Landscape and Visual) of this EIAR presents a site-specific assessment of the landscape and visual impacts of the Proposed Development, as limitations have previously been identified with the LWECS, not least in the DPEA Report to Scottish Ministers which was published for the appeal of the Consented Development (reference PPA-130-2064).
Scoping	Viewpoints: We would be happy to provide further comment on viewpoints on receipt of appropriate supporting information. It is noted that baseline photography is not proposed for VP30 – A83 (BT Car Park) and a wireline is proposed instead. We disagree with this approach as the car park is separated from the A83 by a large grass verge and it is possible to park a vehicle safely away from the A83.	NatureScot have been further consulted in regard to the agreement of viewpoints. An analysis of the viewpoints as agreed are provided in Chapter 7 (Landscape and Visual) of this EIAR. Baseline photography is now provided for the A83 (BT car park) viewpoint; however, it should be noted that viewpoints have been renumbered for this EIAR and so this is no longer VP30.
Scoping	Peat: The Applicant should ensure that any locations of new infrastructure i.e. battery storage and areas of track that require widening, should be sufficiently surveyed for deep peat if they were out with the survey area in 2013 or 2016.	Further peat survey work has been conducted in 2021 as part of the EIA, with Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR presenting the results.
Scoping	Wild Land Assessment (WLA): We advise that the full extent of the WLA and its wild land qualities should be considered. We recommend the use of 'assessment	A WLA has been conducted and is presented in Chapter 7 (Landscape and Visual) of this EIAR.

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	<p>points' to record, in the field, the likely effects on the experience of the wild land qualities while moving through the WLA.</p>	
Scoping	<p>Cumulative assessment: The Cumulative Base Plan should be to a 60km radius unless a reduced radius is justified and agreed. We recommend also including consideration of small-scale proposals (50m or less) within a 20km radius. The sites to be included in the Cumulative Landscape and Visual Impact Assessment (CLVIA) should be agreed with Argyll and Bute Council.</p>	<p>Chapter 7 (Landscape and Visual) of this EIAR includes a cumulative base plan indicating the locations of existing and proposed wind farms within a 60km radius. Smaller scale wind developments (50m or less) within 20km radius is also mapped. The scope of the CLVIA has been determined in consultation with Argyll and Bute Council.</p>
Scoping	<p>Aviation lighting: The assessment of aviation lighting effects will be of critical importance to this Proposed Development. We advise that the lighting assessment should include night-time visualisations from a range of receptors, representative of both low elevation e.g. the coast and high elevation from key hills. We also recommend that the assessment considers a representative viewpoint located at an appropriately selected location within the North Arran WLA and the cumulative effects from other schemes if relevant.</p>	<p>The assessment on aviation lighting has been further discussed with NatureScot through post-coping consultation (see below). It is presented in Chapter 7 (Landscape and Visual) of this EIAR.</p>
Scoping	<p>Site access: Proposed access arrangements could present a significant change to the landscape character at the site entrance, removal of mature trees are likely to be required and a large sweep for access would need to be created.</p>	<p>The proposed access arrangements are fully detailed in this EIAR (see Chapter 3: Project Description and Chapter 14: Traffic, Transport and Access). They are assessed within the LVIA presented in Chapter 7 (Landscape and Visual).</p>
Post-Scoping	<p>Agreement on proposed viewpoints to be used within LVIA.</p>	<p>The viewpoints agreed are set out in detail in Chapter 7 (Landscape and Visual) of this EIAR.</p>
Post-Scoping	<p>It was requested that a form of aviation lighting mitigation called Electronic Conspicuity Aircraft Detection Lighting System should be considered.</p>	<p>Further detail on this is provided in Chapter 16 (Aviation) of this EIAR, which was written by the applicant's aviation consultant, WPAC, who have extensive experience in aviation service provision, regulation, lighting and low flying aircraft operations. In summary, while the CAA advise that this mitigation is technically feasible, the regulatory actions requiring aircraft to carry a compatible system have not yet been completed, signed into law or the coverage requirements agreed. Such systems cannot therefore yet be authorised for use. However, this may be completed within the next five years and if that were the case, in line with the advice from NatureScot, the Applicant proposes a planning condition in order that, if / when this mitigation, or a suitable alternative, is developed that would be acceptable to the</p>

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
Gatecheck	We note the update provided by the Applicant on the aviation lighting requirement as detailed in paragraphs 4.3.7 to 4.3.16 of Gatecheck Report. As it will not be feasible to use the Electronic Conspicuity Aircraft Detection Light System at this time, the aviation lighting assessment will therefore need to represent the worst-case scenario as per our guidance.	CAA, it will be implemented, otherwise aviation lighting will be used until this time Lighting is assessed within the LVIA presented in Chapter 7 (Landscape and Visual).
Gatecheck	Prior to the publishing of the EIAR, we wish to draw the Applicant’s attention to our ‘general pre-application / scoping advice to developers of onshore wind farms’ guidance, in particular to the preferred formatting of the report and associated figures and appendices. This document is regularly updated over to time to reflect any changes to available information and our guidance, so users should ensure they refer to the most up to date version before use.	This has been taken into account throughout this EIAR.

Royal Society for the Protection of Birds (RSPB)

5.3.8 The key points raised by the RSPB which have influenced the structure and focus of this EIAR are set out in Table 5-7

Table 5-7 Key Points Raised by the RSPB

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
Scoping	Ornithology: This Proposed Development has potential to impact on a number of species of birds of conservation concern, particularly, Greenland-white-fronted goose (GWFG), golden eagle, red throated diver, hen harrier, merlin, peregrine and black grouse. We had concerns that impacts of the previous scheme were underestimated and advised that turbines T1, T3 and T4 were relocated and that habitat management is undertaken to restore peatland and native woodland, to minimise the carbon impact of the development and mitigate for biodiversity impacts. We reiterate these concerns - we recommend that turbines T1 and T3 are moved eastwards from open ground / blanket bog and are sited within the forestry and that turbine T4 is moved from the edge further into the forestry. This would	The potential for relocating turbines was balanced through the design development undertaken since the Scoping Opinion was issued. However, on weighing all of the varying constraints which together influence the design of the Proposed Development, including a preliminary assessment conducted by the ornithology team, the layout of the Proposed Development remains similar to that submitted for Scoping. The complete ornithology assessment is presented in Chapter 10 of this EIAR. The location of the borrow pits have been balanced based on useful product, current habitat and planned site restoration as established

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	<p>minimise potential collision by hen harriers and kestrel, reduce habitat loss to golden eagles as well as reducing loss of blanket bog and carbon impacts. NB. borrow pits should be all be on areas of existing forestry rather than impact further on open ground habitats.</p>	<p>through Forestry and Land Scotland's (FLS) (<i>unpublished</i>) updated Carradale Land Management Plan. All borrow pits have been located within areas of existing forestry.</p>
Scoping	<p>Turbine placement: We would advise that ideally all turbines are placed c.500m into the forestry so as to reduce potential displacement for bird species such as golden eagle. This was ignored by the previous scheme. Note - We advise that in order to mitigate potential impacts, the open ground should be managed positively for eagles, turbines should be sited within the forestry, and low-density native forestry and opportunities for peatland restoration are funded through a HMP. We advise relocating turbines T1, T3 and T4 to maintain a robust foraging area for eagles on the western side of the wind farm.</p>	<p>Please see previous comment above on the many factors taken into account through the design process for the Proposed Development, which had to be balanced. This is also referenced through the Design Statement, as well as Chapter 10 (Ornithology) of this EIAR presenting an assessment of effects.</p> <p>Peatland restoration within the Development Site is being funded by the Applicant, please see further detail in comment below.</p>
Scoping	<p>Peatland: Given the statutory duty of the landowner to promote biodiversity, it was particularly disappointing that more consideration was not given to deliver for biodiversity through peatland restoration as well as native woodland planting.</p>	<p>Peatland restoration is part of FLS' (<i>unpublished</i>) updated Carradale Land Management Plan which is soon to be adopted. The Applicant is proposing to deliver the peatland restoration within the Development Site in line with the updated Carradale Land Management Plan, which is further detailed within Chapters 3 (Project Description) and 9 (Ecology) of this EIAR. In the absence of the Proposed Development this peatland restoration would likely still be carried out by FLS, however should the Proposed Development be consented the Applicant will finance the restoration.</p>
Scoping	<p>Surveys: The survey periods were 2014 – 2016 and further ornithology survey for the revised proposal was undertaken in in 2018 – 19. We advise that this later work should include two breeding seasons and that monitoring for any key species should ideally be continued up to and through the application process. It is unclear if survey work for priority species has continued through 2020 and if so it may be compromised by the Covid-19 virus outbreak. We would expect to see justification / analysis of this missed survey period / data. We also advise that applying standard guidance for two years survey will ensure there is at least one full breeding season of more standard data for comparison.</p>	<p>Ornithology surveys are ongoing for the Proposed Development and were not compromised by Covid-19. Chapter 10 (Ornithology) of this EIAR has included data up to and including 2020.</p>
Scoping	<p>HMP: A detailed HMP should be submitted with any application and should include detailed ecological justification for any proposals.</p>	<p>Chapter 9 (Ecology) of this EIAR sets out the mitigation measures and ecological justification to be included in the full HMP which will be completed prior to construction commencing.</p>

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	Grid Connection: We ask that as a minimum an indicative grid connector route is included at the application stage.	The EIAR provides information on the reasonably foreseeable grid connection route.

Scottish Forestry

5.3.9 The key points raised by Scottish Forestry which have influenced the structure and focus of this EIAR are set out in Table 5-8

Table 5-8 Key Points Raised by Scottish Forestry

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	Integration of the project into future forest design plans is a key part of the development process. The removal of large areas of woodland will not be supported. When a proposed development or infrastructure requires to go through forestry, consideration should be given to forest design guidelines.	The Applicant has worked closely with FLS to ensure the Proposed Development and FLS' (<i>unpublished</i>) updated Carradale Land Management Plan are correlated.
Scoping	The EIAR should include a stand-alone chapter on 'Woodland management and tree felling' (a forest plan) prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs.	Chapter 17 ((Forestry) of this EIAR present the forestry assessment, which includes detailed assessment against the updated Carradale Land Management Plan and the impact from any minor amendments to the Proposed Development which have occurred since the Land Management Plan was submitted for consultation.
Scoping	A long-term forest plan should be provided as part of the EIAR (as a technical appendix for context) to give a strategic vision to deliver environmental and social benefits through sustainable forest management and describes the major forest operations over a 20 years period.	
Gatecheck	Scottish Forestry has considered the Gatecheck Report and advise that both the UK Forestry Standard -4th Edition – 2017 (UKFS) and Scottish Governments Control of Woodland Policy 2009 (CoWRP) apply to the proposal. There appears to be no specific mention of CoWRP and we assume that this along with any compensatory planting requirements will be fully covered in the Forestry Chapter or appendices	Chapter 17 (Forestry) of this EIAR includes reference and assessment against these documents.

Scottish Ministers

5.3.10 The key points raised by Scottish Ministers which have influenced the structure and focus of this EIAR are set out in Table 5-9.

Table 5-9 Key Points Raised by Scottish Ministers

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	Aviation: With regards to impacts of night-time aviation lighting, the Applicant should discuss and agree with Argyll and Bute Council and NatureScot the range (in kilometres from the Proposed Development) for night time assessments of the impacts of night-time aviation lighting and receptors therein to be assessed. As well as the scope, methodology, findings and recommendations of such assessments, full details of all mitigation of aviation lighting impacts subsequently identified should be provided in this EIAR.	Post-scoping consultation has been held with NatureScot and Argyll and Bute Council to agree these points, as is detailed in Chapter 7 (Landscape and Visual) of this EIAR.
Scoping	Aviation: The impacts of night-time aviation lighting on the Kintyre Dark Discovery Site and the Merrick Wild Land Area be fully assessed and the outcome and findings of which, along with appropriate visualisations, be presented in this EIAR. The Applicant should discuss and agree the finalised content and style of the visualisations with NatureScot.	Consultation with NatureScot on night-time visualisations has been undertaken in 2021 and Chapter 7 (Landscape and Visual) of this EIAR reports on the assessment outcome.
Scoping	Battery Storage: Full details of what it will entail (scale, dimensions etc), its location in the site, minimum and maximum export capacity of megawatts and megawatt hours of electricity as well as a full suite of appropriate assessments of its impacts and effects and all proposed mitigation should be included in the EIA and EIAR.	Details of battery storage is included in Chapter 3 (Project Description) of this EIAR. The EIA has included the battery storage as a component of the Proposed Development and so it has been included in the assessment of any likely effects throughout the EIAR.
Scoping	Ornithology: The Applicant should discuss with the RSPB Scotland and NatureScot the need for targeted assessment and mitigation in relation to species of birds of conservation concern which the Proposed Development has the potential to impact.	Consultation with the RSPB and NatureScot is confirmed within Chapter 10 (Ornithology) of this EIAR which reports on the assessment outcome.
Scoping	Heritage: The final list of heritage assets and their settings to be made subject to assessment should be discussed and agreed with HES.	This has been agreed with HES and is detailed in Chapter 12 (Cultural Heritage) of this EIAR.
Scoping	North Arran Wild Land Area: The Applicant undertakes a WLA of the North Arran Wild Land Area, the scope and methodology of which should be decided following discussion and agreement between the Applicant and NatureScot.	A WLA based on NatureScot's methodology has been conducted for the EIA and is reported within Chapter 7 (Landscape and Visual) of this EIAR.

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	Viewpoints & Scope of Landscape and Visual Assessment: The final list of viewpoints and the scope of Landscape and Visual Assessments should be agreed following discussion between the Applicant, Argyll and Bute Council, HES and NatureScot.	Consultation has been held with these organisations resulting in viewpoints being agreed, as is reported in Chapters 7 (Landscape and Visual) and 12 (Cultural Heritage) of this EIAR.
Scoping	Noise assessment: The final list of receptors in respect of noise assessment should be agreed following discussion between the Applicant and Argyll and Bute Council.	The 2020 Scoping Opinion response from the Council indicated full agreement with the proposed methodology and therefore no further consultation was undertaken. Chapter 8 (Noise) of this EIAR details this.
Scoping	Cumulative assessment: The assessment range (in kilometres) and other Developments to be included in cumulative assessments should be discussed and agreed with Argyll and Bute Council.	Post-scoping consultation has been held with NatureScot and Argyll and Bute Council and the cumulative assessment scope has been agreed for the LVIA, this is reported in Chapter 7 (Landscape and Visual) of this EIAR. All remaining technical chapters of this EIAR (8 to 18) report on cumulative effects taking into account this and relevant discipline guidance.
Scoping	Peat landslide hazard and risk assessment: where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide the Scottish Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures.	A peat landslide risk assessment has been conducted and is attached as Appendix 11.3 to this EIAR.
Scoping	Peat Management Plan: The Peat Management Plan to be included in the Construction Environmental Management Plan (CEMP) should be formulated and finalised following discussions between the Applicant and the Scottish Environment Protection Agency (SEPA).	A CEMP will be prepared following receipt of planning permission and prior to site works and will be expected to include a Peat Management Plan. The Applicant is also planning to conduct peatland restoration within the Development Site (see Figure 17.8; EIAR Volume 2b) and this is expected to be covered by a Planning Condition if the Proposed Development is approved.
Scoping	Private Water Supplies: The Applicant should investigate the presence of any private water supplies which may be impacted by the Proposed Development. This EIAR should include details of any supplies identified by this investigation, and if any supplies are identified, the Applicant should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR reports on private water supplies.
Scoping	Mitigation Measures: The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule, in tabular	Each technical chapter of this EIAR (7 to 18) includes a conclusive mitigation chapter and a consolidated Schedule of Mitigation is provided within Appendix 19.1 (EIAR Volume 3).

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
	form, of all mitigation measures proposed in the environmental assessment, where that mitigation is relied upon in relation to reported conclusions of likelihood or significant of impacts.	

ScotWays

5.3.11 The key points raised by ScotWays which have influenced the structure and focus of this EIAR are set out in Table 5-10

Table 5-10 Key Points Raised by ScotWays

Stage	Summary of Key Points Raised	Applicant’s Response or EIAR Signpost
Scoping	It should be noted that the Kintyre Way, a long-distance route used by walkers, runners and cyclists, is affected by the proposed access route. This route is promoted by NatureScot as one of Scotland’s Great Trails. We anticipate that the Applicant will provide details of how public recreational access along this route will be maintained at all stages of the development should consent be granted. We strongly recommend that they consult with the access team at Argyll and Bute Council.	This has been taken into consideration during the design of the Proposed Development, including the design of the access roads, and is referenced within Chapters 7 (Landscape and Visual), 13 (Socio-economics, Recreation and Tourism) and 14 (Traffic, Transport and Access) of this EIAR. Further detail on the need to maintain suitable recreational access during construction whilst minimising health and safety risks would be addressed within the CEMP, which would be prepared following receipt of planning permission and prior to site works.

SEPA

5.3.12 The key points raised by SEPA which have influenced the structure and focus of this EIAR are set out in Table 5-11

Table 5-11 Key Points Raised by SEPA

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	<p>Information requirements:</p> <ol style="list-style-type: none"> 1. Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications, 2. Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers, 3. Map and assessment of impacts upon groundwater abstractions and buffers, 4. Peat depth survey and table detailing re-use proposals, 5. Map and table detailing forest removal, 6. Map and site layout of borrow pits, 7. Schedule of mitigation including pollution prevention measures, 8. Borrow Pit Site Management Plan of pollution prevention measures, 9. Map of proposed waste water drainage layout, 10. Map of proposed surface water drainage layout, 11. Map of proposed water abstractions including details of the proposed operating regime, 12. Decommissioning statement. 	<p>All of the information listed is provided within this EIAR (namely Chapters 3 (Project Description), 11 (Geology, Hydrology and Hydrogeology), 17 (Forestry) and 19 (Summary of Effects and Conclusions)).</p> <p>This excludes the requirements listed as 8 to 12 which would either accompany a future CEMP (to be prepared following receipt of planning permission and prior to site works) or be submitted as a planning condition attached to consent.</p>
Scoping	<p>Water environment: The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and maps provided as listed.</p>	<p>Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR reports on this.</p>
Scoping	<p>Peatland: The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO² and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels,</p>	<p>Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR reports on steps taken to avoid peat (this is also referenced within the Design Statement which separately accompanies this Section 36 Application) and any necessary mitigation measures.</p>

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
	cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.	
Scoping	<p>Forestry: Key-holing must be used wherever possible as large-scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible. Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include information as listed.</p>	The Proposed Development has been designed in consultation with FLS on the updated Carradale Land Management Plan (<i>unpublished</i>). Turbines have been located in areas of the forest which are soon to be felled, with additional key-holing being limited. Further detail is provided in Chapter 17 (Forestry) of this EIAR.
Scoping	Borrow pits: Scottish Planning Policy states (Paragraph 243) that " <i>Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited, tied to a particular project and appropriate reclamation measures are in place.</i> " The submission must provide sufficient information to address this policy statement as listed.	Borrow pits are included within the Proposed Development, their locations reflecting access track routes to minimise effects on peatland / forestry. Six have been identified, however this is the maximum number likely to be required and so it is unlikely that all will be used. The use of these borrow pits would reduce the number of traffic movements which would otherwise be necessary to get material to the Development Site. Further detail is provided in Chapters 11 (Geology, Hydrology and Hydrogeology) and 14 (Traffic, Transport and Access) of this EIAR.
Scoping	Pollution prevention and environmental management: A schedule of mitigation supported by the above site-specific maps and plans must be submitted as listed.	A Schedule of Mitigation will be provided in Appendix 19.1 (EIAR Volume 3).
Gatecheck	We expect this EIAR to include an assessment of the impacts upon groundwater abstractions (e.g. private water supplies) in line with our guidance rather than being covered post consent within a Construction Environmental Management Plan (CEMP).	Chapter 11 (Geology, Hydrology and Hydrogeology) of this EIAR includes an assessment on groundwater abstractions and these are mapped through Figure 11.6 (EIAR Volume 2b).

Transport Scotland

5.3.13 The key points raised by Transport Scotland which have influenced the structure and focus of this EIAR are set out in Table 5-12

Table 5-12 Key Points Raised by Transport Scotland

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	It should be noted that while it is accepted that previous assessments have been carried out, Transport Scotland will require to be satisfied that the increased size of turbines proposed can negotiate the selected trunk road route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided with this EIAR that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	These assessments have been conducted for the design of the Proposed Development and is reported in Chapter 14 (Traffic, Transport and Access) of this EIAR.

West Kintyre Community Council

5.3.14 The key points raised by West Kintyre Community Council which have influenced the structure and focus of this EIAR are set out in Table 5-13

Table 5-13 Key Points Raised by West Kintyre Community Council

Stage	Summary of Key Points Raised	Applicant's Response or EIAR Signpost
Scoping	We believe the developer RWE should be instructed to follow both the Scottish Government and Visit Scotland's advice on windfarms and carry out an independent tourism impact statement.	An assessment on recreation and tourism alongside the economic impacts of the Proposed Development has been completed as part of the EIA and is presented in Chapter 13 (Socio-economics, Recreation and Tourism) of this EIAR. This follows the methodology as considered appropriate for the Proposed Development. An independent tourism impact statement has not been considered necessary.

5.4 References

- FLS (*unpublished*) Updated Carradale Land Management Plan

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