



Appendix 4.3 - Cross-reference of EIA Scoping Opinion in the EIA Report

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Executive Summary

Following receipt of the EIA Scoping Opinion the Applicant has considered the consultation received and Table 1 below provides a cross-reference to the appropriate Chapter within the EIA Report where a response is provided.

Table 1 - Cross-reference of EIA Scoping Opinion in the EIA Report

Consultee	Technical Discipline	Scoping Response	EIA Report
The Highland Council	EIA	The EIA Report must contain a detailed description of the development.	Refer to Chapter 3 within the EIA Report.
		The EIA Report must include a statement which outlines the main development alternatives studied by the applicant.	Refer to Chapter 2 within the EIA Report.
		The EIA Report must provide a description of the aspects of the environment likely to be significantly affected by the development. The baseline should attempt to reflect the conditions of the site prior to the development taking place.	Refer to Chapters 6-16 within the EIA Report.
		The EIA report should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Scheme of Mitigation.	Refer to Chapter 17 within the EIA Report
		Where significant effects are anticipated, mitigation measures should be identified and provided. This should include proposals for implementation and monitoring of those measures. A summarised table of the measures should be provided within the EIA report. In accordance with the requirements of the	Mitigation measures are detailed in each technical chapter (Chapters 6-16) and a summarised table of measures is presented in Chapter 17 of the EIA Report.

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		<p>Regulations, the EIA should be accompanied by a non-technical summary of the issues addressed in the main document.</p>	<p>Refer to Chapter 4 regarding the implementation of the measures.</p> <p>The EIA Report is accompanied by a Non-Technical Summary.</p>
	Landscape and Visual	<p>A Landscape and Visual Impact Assessment (LVIA) should be carried out to consider the fit of the Proposed Development to the character of the area in accordance with GLVIA3.</p> <p>The LVIA should include the representative viewpoints laid out in the Scoping Report however it may be appropriate to review these and consider how the viewpoints for other schemes in the vicinity of this development could be utilised for cumulative effect.</p> <p>Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council.</p> <p>There may be some visibility from Special Landscape Areas, it would be appropriate to assess impacts on the special qualities of these and any other SLAs in the EIAR.</p>	<p>Refer to Chapter 6 within the EIA Report.</p>
	Ecology	<p>The EIA Report should include an should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed in the contexts of both biodiversity conservation and the inherent risk of peat slide.</p>	<p>Refer to Chapters 8 and 9 within the EIA Report.</p>

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	Geology, Peat, Hydrology and Hydrogeology	<p>The EIA Report should identify likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect.</p> <p>The EIAR should consider the risks of engineering instability relating to presence to peat on the site as well as the issue of carbon balance.</p> <p>The applicant must address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, private supplies and the aquatic interests within local watercourses. The assessment should then lead on to appropriate mitigation being identified with measures proposed to prevent contamination or physical disruption.</p> <p>The applicant will require to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption.</p>	Refer to Chapter 9 within the EIA report.
	Forestry	<p>The Scottish Government's Control of Woodland removal Policy must be addressed, and compensatory planting calculations provided in the EIAR.</p> <p>The EIA report should contain full consideration for the presence of woodland which is nationally and internationally designated. The applicant should be advised to provide an Arboricultural Impact Assessment and a Tree Protection Plan to BS:5837(2012) in support of any planning application.</p>	Refer to Chapter 16 within the EIA Report.
	Air quality	The EIA must address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind and all relevant climatic factors which can greatly influence the impact range of many	As per Chapter 4, impacts on air quality and sunlight have been scoped out of the EIA.

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		<p>of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction, etc.</p> <p>Depending on the proximity to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction including traffic movements.</p>	<p>The Proposed Development has been designed based on wind data from a met mast positioned on site and therefore considers the prevailing wind.</p> <p>Assessment of noise is provided in Chapter 10.</p>
	Cultural Heritage	<p>The Cultural Heritage chapter of the EIAR will need to be undertaken by a professional and competent historic environment consultant.</p> <p>The cultural heritage chapter will be informed by a detailed walkover survey of the development area (including any land required for associated infrastructure).</p> <p>Where indirect impacts are predicted, these will be illustrated using photomontages. Cumulative visual impacts, including existing and proposed wind farm development in the wider area (where applicable), must be taken into consideration and assessed in this case.</p> <p>Where impacts are unavoidable, the Council's HET expect proposed methods to mitigate this impact to be discussed in detail, including both physical (i.e. re-design) and where appropriate, compensatory and off-setting. Areas subject to survey must be clearly marked on a map.</p>	Refer to Chapter 11 within the EIA Report.
	Noise	<p>The applicant will be required to submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics.</p>	Refer to Chapter 10 within the EIA Report.

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		<p>The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments.</p> <p>The assessment must include a compliance monitoring mitigation scheme which will demonstrate how noise levels from the development will be identified should a complaint arise.</p>	
	Shadow Flicker	Shadow flicker should be addressed in the EIA Report.	As per Chapter 4, impacts of shadow flicker have been scoped out of the EIA.
	Traffic and Transport	A Transport Assessment should be submitted as part of the planning application detailing proposed routes and volumes for all construction related traffic. This Transport Assessment should also identify potential impacts of this traffic on local and strategic transport infrastructure and measures to mitigate these impacts.	Refer to Chapter 12 within the EIA Report.
	Socio-Economic and Tourism	<p>The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.</p> <p>In line with the policies and provisions of the Highland-wide Local Development Plan a plan detailing:</p>	Refer to Chapter 13 within the EIA Report

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		<p>Existing public non-motorised public access footpaths, bridleways and cycleways on the site and any proposed access route from the public road infrastructure;</p> <p>Proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water); and</p> <p>Impacts of the proposed development on the core path SU21.02 and proposed mitigation if any.</p>	
THC (Development Plans)	EIA	<p>The Scoping Report includes, in several places, reference to the Onshore Wind Energy Interim Supplementary Guidance (2012). However, that has been superseded by the adopted Onshore Wind Energy Supplementary Guidance (2016). The Report therefore requires updating.</p> <p>Paragraph 3.3.12 of the Report indicates the site as being Group 3 in the Spatial Framework. However, with reference to the latest Spatial Framework (in the adopted Supplementary Guidance), it should be noted that the site lies not in a Group 3 area but in a Group 2 area (Areas of Significant Protection); this is by virtue of the Carbon Rich Soils, Deep Peat and Priority Peatland Habitat mapping. With reference to the relevant SNH mapping of that feature, most of the site (including the provisional turbine locations indicated in the Report) falls within Class 1, whilst a small part falls within Class 2.</p>	Refer to Chapters 5 and 9 within the EIA Report.
	Shadow Flicker	Section 15 of the Report, which deals with Shadow Flicker, requires updating in its reference to the content of the Supplementary Guidance to reflect the	As per Chapter 4, impacts of shadow flicker have been scoped out of the EIA.

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		adopted version: in particular, the Council's requirements relate to a distance threshold of 11 times rotor diameter (not 10).	
	Landscape and Visual	Regarding assessment of impact on Wild Land Areas, the Scoping Report indicates intention to use the old (2007) SNH guidance until the emerging new guidance is finalised. However, this goes against current advice on SNH's website which says that the consultative draft guidance (2017) should be applied in place of the 2007 guidance while SNH considers the responses to the draft.	Refer to Chapter 6 within the EIA Report.
Transport Planning	Traffic and Transport	<p>A Transport Assessment (TA), or section on traffic and transportation, within the Environmental Statement for the project will be required. The TA should identify all Council maintained roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic, including abnormal load movements, on these roads.</p> <p>Any timber extraction required in connection with the development proposals should also be considered in the TA.</p> <p>The TA should include a framework CTMP aimed at minimising the impact of the construction traffic. It shall include measures to ensure development traffic adheres to the approved routes and establish protocols for the movement of HGV's on minor public roads.</p>	Refer to Chapter 12 the EIA Report.
SEPA	EIA	All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure	Noted – refer to Volume 2 and 3 of the EIA Report

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	Geology, Peat, Hydrology and Hydrogeology	<p>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 a map showing:</p> <ul style="list-style-type: none"> a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. <p>If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.</p> <p>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, cable trenches, or the storage and re-use of excavated peat.</p> <p>The submission must include:</p> <ul style="list-style-type: none"> a) A detailed map of peat depths 	Refer to Chapters 2 and 9 within the EIA Report.

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		<p>b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.</p> <p>Applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.</p>	
	Ecology	<p>The EIA Report must include a map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p>	Refer to Chapters 8 and 9 within the EIA Report.
	Geology, Peat, Hydrology and Hydrogeology	<p>The submission must include:</p> <p>a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p>	Refer to Chapter 9 within the EIA Report.

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		<p>b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.</p>	
	Forestry	<p>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.</p> <p>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:</p> <p>a) A map demarcating the areas to be subject to different felling techniques.</p> <p>b) Photography of general timber condition in each of these areas.</p> <p>c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.</p> <p>d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan.</p>	Refer to Chapter 16 within the EIA Report
	Geology, Peat, Hydrology and Hydrogeology	<p>Scottish Planning Policy states (Paragraph 243) that “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.” The submission must provide sufficient information to address this policy statement.</p>	Refer to Chapter 9 within the EIA Report.

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SNH	Geology, Peat, Hydrology and Hydrogeology	<p>The scoping report incorrectly identifies the proposal area as not containing any of this nationally important mapped environmental interest.</p> <p>We consider that it may be possible to build a wind farm of the scale proposed without significant effects on deep peat and priority peatland habitat. The Environmental Statement (ES) will need to address, in detail, how a wind farm can be constructed without compromising this national interest. Opportunities to mitigate impacts through siting, design and other measures should be fully considered within the ES. This may include options for significant habitat restoration to mitigate any loss and damage to this peatland interest.</p> <p>We advise that a peat management plan is produced for this proposal. We note that forestry removal will be required in order to facilitate the windfarm.</p> <p>Where forestry is not be restocked, we advise that the peatland should be fully restored as part of this habitat management plan.</p> <p>We advise that a peat slide risk assessment will be required for this proposal.</p>	Refer to Chapter 9 within the EIA Report.
	Ecology	<p>Given the scale of the proposal and its likely impact on nationally important habitats, a habitat management plan will be required.</p> <p>We advise that a detailed NVC survey is undertaken of the proposal area and any notable plant species, particularly those which are nationally rare or scarce, should be recorded.</p> <p>The distribution of all legally protected species may change between the point of survey and the point at which construction commences, should planning permission be granted. We advise that ES should commit to undertaking pre-construction surveys at an appropriate time of year to inform the presence of protected species prior to construction. Should surveys identify protected species which could be affected by the proposal; a species protection plan</p>	Refer to Chapter 8 within the EIA Report.

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		<p>should be provided identifying appropriate mitigation. Species licences may be required.</p> <p>We note the presence of otter on the site and advise that an assessment of the impacts on otter is provided within the ES. The ES should demonstrate how otter will be protected a species protection plan should be provided within the ES for otter.</p> <p>We note that wildcat has been scoped out of the survey as the Phase 1 habitat survey did not identify any suitable habitat. i.e. Areas of woodland. We consider that the site and adjacent ground could support wildcat and therefore a survey for wildcat should be undertaken.</p> <p>The scoping report does not identify the bat roost location; however, bats could be roosting in trees or in structures which could be affected by the proposal. We advise that the roost location for all species of bats recorded is identified. Should the proposal affect a bat roost, a species protection plan should be provided identifying appropriate mitigation. A species licence may be required.</p> <p>We advise that a deer assessment is undertaken for this proposal and should be presented with the ES. Depending on the outcome of this assessment, a Deer Management Statement (DMS) may be required</p>	
	Landscape and Visual	We advise that a wild land assessment will be required to fully inform the impacts on the following Wild Land Areas; WLA 35 (Ben Klibreck and Armine Forest) and WLA 34 (Reay – Cassley).	Refer to Chapter 6 within the EIA Report
	Ornithology	If protected breeding birds could be affected by the proposal, mitigation should be identified, and a Species Protection Plan supplied within the ES	Refer to Chapter 7 within the EIA Report.

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HES	Landscape and Visual	We strongly recommend that a new ZTV is undertaken as soon as possible in order that the assessment can be reviewed and revised if necessary, along with the requirement for visualisations from individual assets.	Refer to Chapters 6 and 11 within the EIA Report
	Cultural Heritage	<p>As there are a number of heritage assets located in the vicinity of the proposal, some in very close proximity, we advise that there is the potential for significant effects on the setting of those assets. As in the previous iteration of the proposed scheme, the following heritage assets are in the vicinity of the development and have the potential to be impacted by it. This list is not considered to be exhaustive, and we would recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance. It is important to note that some monuments have settings that are particularly sensitive to impacts, and the likely sensitivity of the setting should be used to help determine which sites are assessed in more detail in the EIA Report.</p> <p>Scheduled Monuments</p> <ul style="list-style-type: none"> • Cnoc a' Bhreac-leathaid, shielings and cairnfield 700m NNE of (SM 5300) • Loch Beag na Fuaralachd, cairn and shielings 1175m ESE of SW end (SM 5081) • Loch Beag na Fuaralachd, shielings 1000m SW of SW end of (SM 5159) • Dalnessie, settlement N of Feith Osdail (SM 4563) • Cnoc Olsadail hut circles and field systems (SM 4375) • Loch Beag na Fuaralachd, prehistoric settlement 950m SW of SW end (SM 5401) <p>We note that in the sections on regional and local importance there are statements regarding the condition of assets which could potentially lead to</p>	Refer to Chapter 11 within the EIAA Report.

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		<p>confusion. The table states that sites will be considered of regional or local importance if they would ordinarily be considered nationally important but have been damaged such that their ability to inform is reduced. In our view asset types with national designations are of national importance regardless of condition. Should the assessor consider that the designation of an asset requires review, this issue should be raised with Historic Environment Scotland. In addition, 'cropmarks of indeterminate origin' are referred to as of local importance which may lead to confusion regarding those cropmarks which are also scheduled monuments.</p>	