CLASHINDARROCH II WIND FARM

Scoping Opinion 2017

Prepared for: Vattenfall Wind Power Ltd

Technical Appendix 6.2

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SLR Ref: 405.03640.00011
November 2019

Scottish Government

Energy Consents Unit

Scoping Opinion on behalf of the Scottish Ministers under Part 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Vattenfall Wind Power Ltd

CLASHINDARROCH II WIND FARM

July 2017

Contents

1. Introduction

On 5 April 2017, SLR Consulting Limited, on behalf of Vattenfall Wind Power Ltd, submitted a request to the Scottish Ministers for a scoping opinion under regulation 7 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000, as amended, relating to the proposed Clashindarroch II Wind Farm. The request was accompanied by a Scoping Report.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 came into force on 16 May 2017.

Transitional Provisions – Requests for Scoping Opinions

Transitional provisions for requests for scoping opinions made before 16 May 2017 are set out in regulation 40(3) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017:

Where-

(a) a request for a scoping opinion is made before 16th May 2017; and

(b) the Scottish Ministers have not adopted a scoping opinion before that date;

that request is to be treated as having been made under regulation 12(1) but when adopting a scoping opinion the Scottish Ministers are to assess the scope and level of detail of information to be contained in the EIA report by reference only to the scope and level of detail of information which immediately prior to 16th May 2017 had to be included in an environmental statement in accordance with regulation 4(1) and schedule 4 of the 2000 Regulations.

<u>The Clashindarroch II Wind Farm proposal ("the proposed Development"</u>

The proposed Clashindarroch II Wind Farm would be an extension to the existing Clashindarroch Wind Farm and would be located within Clashindarroch Forest, approximately 6km to the south west of Huntly, Aberdeenshire within the Aberdeenshire Council local authority area.

The relevant planning authority will be Aberdeenshire Council.

The proposal is for up to 16 turbines each having a maximum blade tip height of up to 149.9 metres, with the total generating capacity proposed to be in excess of 50 MW when considered with the existing Clashindarroch Wind Farm.

In addition to the wind turbines there will be ancillary infrastructure including:

- Power cables linking the turbines laid in trenches underground;
- Met mast;
- Substation and control building;
- On-site access tracks;
- Crane hardstandings adjacent to each turbine;
- Temporary site construction compound and associated infrastructure; and
- Borrow pits.

The proposed Development is located within the Grampian Outliers landscape character area within the Moorland Plateau landscape character types. The site is predominantly covered by commercial forestry but has some areas of open moorland and ancient woodland.

The area of the site extends to 1560ha, with the proposed turbines located in the southern part of the site. Access to the site would be taken from the A920 and would utilise the existing on-site access tracks as far as possible.

Consultation

On receipt of the scoping opinion request, the Scottish Ministers initiated a consultation on the contents of the Scoping Report. This commenced on 19 April 2017 and requests for consultations were sent to Aberdeenshire Council, Scottish Natural Heritage, the Scottish Environment Protection Agency, Historic Environment Scotland and various other bodies whom the Scottish Ministers consider are likely to have an interest in the proposed application. The deadline for consultation responses was initially 12 May 2017, however several extension requests were granted, and the last response was received on 15 June 2017.

The purpose of the consultation was to obtain advice and guidance from each consultee in respect of the information which each of them believe should be provided in the EIA report. Full consultation responses are attached in Annex A and each should be read in full for detailed requirements from individual consultees and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Statement.

The Scottish Ministers are satisfied that the requirements for consultation set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 have been met.

2. The Scoping Opinion - Explanation

This scoping opinion is, effectively, a collection of the responses received to the consultation request of 19 April 2017 and it is issued on behalf of the Scottish Ministers to Vattenfall Wind Power Ltd in relation to the proposed Clashindarroch II Wind Farm.

Regard has been given to current knowledge and methods of assessment and the specific characteristics of the proposed Development, the specific characteristics of that type of development and the environmental features likely to be affected have been taken into account.

The Scottish Ministers expect the EIA report which will accompany the application for the proposed Development, to include full details showing that all the advice, guidance, concerns and requirements raised by each consultee as being addressed.

A copy of this scoping opinion has been sent to Aberdeenshire Council for transferring to Part I of the planning register.

3. Duration of Scoping Opinion

This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at today's date. Nothing in this written scoping opinion will prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional Developments which enter the planning process after the date of this opinion.

Without prejudice to that generality, it is recommended that an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

4. Site specific issues of interest to the Scottish Ministers

Subject to specific comments below the Scottish Ministers expect the EIA report which will accompany any application for the proposed Development to include full details showing that **all the advice**, **guidance, concerns and requirements** raised by each consultee in the correspondence attached at **Annex A** to this opinion, as being addressed.

EIA Directive

The application will be assessed against new Regulations introduced on 16 May 2017 to transpose changes to the EIA Directive. These include a requirement to consider impacts on biodiversity and on population and human health. Scottish Ministers would ask that you address these matters in your environmental impact assessment. One area that you may wish to consider is how traffic and transport impacts (for example noise and vibration) might impact upon human receptors.

Other Issues

It should be noted that to facilitate uploading to the Energy Consents portal the EIA report and its associated documentation, when submitted, should be accompanied with a CD containing the EIA report and its associated documentation divided into appropriately named separate files of sizes no more than 10 MB. This will also assist SNH and other consultees.

5. Process Going Forward

It is acknowledged that the Environmental Impact Assessment process is iterative and should inform the final layout and design of proposed Developments. All applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit before proposals reach design freeze. This will afford an opportunity for additional comments to be provided on the final proposals at pre-application stage.

Applicants are reminded that there will be limited opportunity to materially vary the form and content of a proposed Development post submission.

When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA reprtt each of the specific matters raised in this scoping opinion has been addressed.

6. Consultation

Prior to the Scoping Report being sent out for consultation a list of consultees was agreed by SLR Consulting (on behalf of Vattenfall Wind Power Ltd) and the Energy Consents Unit. For a list of respondents and copies of their responses see Annex A.

All consultation responses received should be considered in full and Scottish Ministers expect the EIA report to include all matters raised by the consultees.

With regard to those consultees who did not respond, it is assumed that they have no comment to make on the Scoping Report.

ANNEX A

CONSULTATION RESPONSES

Consultee

Aberdeenshire Council
Aberdeenshire Council Archaeology Service
Aberdeen Airport
The British Horse Society
British Telecom
Cairngorms National Park Authority
Defence Infrastructure Organisation
Fisheries Management Scotland
Forestry Commission Scotland
Historic Environment Scotland
Huntly Nordic Ski Club
Joint Radio Company
Marine Scotland
NATS Safeguarding
The River Deveron District Salmon Fishery Board
RSPB Scotland
Scottish Water
Scottish Rights of Way and Access Society (ScotWays)
Scottish Environment Protection Agency (SEPA)
Scottish Natural Heritage (SNH)
Tap o'Noth Community Council
Transport Scotland
Visit Scotland

Our Ref: M/ENQ/2017/0256
Your Ref:

Ask for: Neil Mair
Direct Dial: 01569-768335
Email: neil.mair@aberdeenshire.gov.uk

Vattenfall Wind Power Ltd

Date: 1 March 2017

Dear Sir/Madam

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011
Proposal: Erection of 16 Turbine Wind Farm
Address: Clashindarroch II Wind Farm, Huntly

I refer to your request/consultation on a scoping opinion for the above proposal received on 9 February 2017. I am now in receipt of most of the necessary consultation responses and I can now offer a scoping opinion under Regulation 14 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 (the Regulations).

Schedule 4 of the Regulations states the information which should be included in an Environmental Statement (ES). These guidelines offer the backbone to the structure of an ES and should be used as the basis for your submission. The draft ES you have provided is quite thorough, and has given consultees a lot to consider at this stage.

In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular these include characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen. Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected. Detailed survey work would be required to inform the ES. Following analysis of the aspects of the environment which would be likely to be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed.

Examples of the types of issues that should be addressed in full include:

- Climate change
- Local Economic Effect
- Landscape Resource
- Soils and geology
- Visual Amenity
- Ornithology
- Visual Amenity
- Ecology
- Nature Conservation
- European Protected Species
- Hydrology and Water Supplies
- Forestry and Tree Felling
- Transport and Traffic including road safety issues and impact on local road network during and after construction work
- Noise
- Cultural Heritage and archaeology
- Land Use
- Land Ownership
- Tourism and Recreation, including footpaths
- Proposed mitigation measures

Please note that the above list is by no means exhaustive, and indeed a number of these matters have been explored in the draft ES submitted. Other issues might become obvious following public consultations and consultations with statutory consultees.

This advice is based on the Regulations and the consultation responses of the following, who have responded:

Environment Team - Marr
Date Consulted: 21 February 2017

Local Nature Conservation Sites - these are sites of regional/local importance that have been identified by Aberdeenshire Council and which will be identified in the new Aberdeenshire Local Development Plan. There is a LNCS at Craigs of Succoth which covers a slightly larger area that that covered by the SSSI. This site would appear to lie immediately adjacent to the proposed development site and therefore any potential impact needs to be considered. Details of the site boundary and its interest can be supplied by NESBReC. There is also a LNCS at Hill of Townanreef/The Buck which again covers a larger area than the SSSI and has a broader interest. Apart from the ornithological interest, this site is mainly of botanical interest, and this is unlikely to be affected by the proposed development.

Wildcat – It is noted that SNH and the Scottish Wildcat Action team have been consulted regarding survey for wildcat. I would encourage further discussion on mitigation for wildcat and also to consider what measures could be incorporated into the

Habitat Management Plan to manage and enhance the habitat within the development site for this species.

The Habitat Management Plan should identify opportunities for the management of existing habitats but also identify opportunities for biodiversity enhancement.

For those assets identified and where during the assessment process it is clear that there will be a significant visual connection. Then a full impact on setting needs to carried out. This assessment should be in accordance with, *Historic Environment Scotland's Managing Change Guidance Note: Setting.*

It should be taken in to account that visibility in itself may not necessarily be negative unless it obscures key view points to the asset, sits in a location which, when the asset itself is viewed, it over powers or sits in a location which distracts from or undermines the interest or character of the asset.

Therefore, where visual impact assessments are provided they should include the asset and the windfarm in context with each other so a full assessment can be made.

Huntly Conservation Area – due to the significance of this area and the significant amount of cultural heritage assets in this location, a full assessment of the impact of the Conservation Area should be included.

Supporting Statement:

Their methodology for assessment appears comprehensive and acceptable and for the avoidance of doubt should include:

Stage 1: identify historic assets
This should include any historic assets or scheduled monuments which may be impacted on by the development and should be inclusive of those assets out with the proposed site.

Stage 2: define and analyse setting
How do the surroundings (including the land scape) contribute to our ability to appreciate and understand a historic asset or place?
Was it intended to have wide views over the landscape?
Key viewpoints to, from and across the setting of a historic asset should be identified.
Understanding changes in setting through time is important to understanding the history of an asset or place. Historic Landscape Assessment may be useful for identifying these changes e.g. maps.

Stage 3: assess the impact of new development
The visual impact of the proposed change relative to the
current place of the historic asset or place in the landscape;

the presence, extent, character and scale of the existing built environment within the surroundings of the historic asset or place and how the proposed development compares to this;
the ability of the landscape, which comprises the setting of a historic asset or place, to absorb new development without eroding its key characteristics; the effect of the proposed change on qualities of the existing setting such as sense of remoteness, evocation of the historical past, sense of place + cultural identity.

Geographical Information Systems (GIS) production of wireframes, viewshed analysis and digital terrain models. Digital Historic Land use Assessment (HLA) and other graphic presentations such as photomontages can all be used to assist in reaching an understanding of a historic asset or place in the landscape and how development may affect it.

The proposed development will be designed and progressed as per current EIA regulations and best practice including EIA (Forestry) regulations.

The applicant has provided information in relation to existing site, as well as adjacent environmental designations and sensitivities. The applicant has indicated an initial proposed wind farm layout with accompanying ZTV indications and a list of proposed viewpoints.

In terms of viewpoint selection, it is important that a degree of flexibility remains with identifying particular viewpoints/receptors. Certain views only become apparent as being important, as the review of a proposed development proceeds, often by third parties. Because of the location of this proposed development, in relation to potentially sensitive visual/landscape receptors and other wind energy developments in the area, it is important that all parties to the application take a flexible approach to further information production at all stages of the wind energy scheme development process, should that be required.

In principle for the landscape and visual impact assessment section of an environmental impact assessment, information should be primarily graphic based on ZTV maps for hub height and tip height. Panoramas, photomontages and wireline models should be produced of the proposal with accompanying assessment of landscape and visual affects. Any proposed wind monitoring masts should also be included in the landscape and visual impact assessment.

The proposed development should as far as practical, be compatible with or positively assimilate with the site's landscape character. Possible visual effects, such as parts of blades only being seen on the horizon should be avoided/minimised, as well as excessive clustering, especially when seen from sensitive receptors.

An applicant needs to give significant consideration to the visual relationship between this proposed scheme and the existing Clashindarroch wind farm. The turbine

specifications, their design, colour and the rate of rotor rotation etc. needs to be compatible between the existing and proposed wind energy developments to minimise any discordant visual affects caused when the Clashindarroch II project would be seen in combination with the existing Clashindarroch wind farm.

In terms of consultation, The Huntly Nordic Ski Club should be consulted as they use the Clashindarroch area for activities in winter.

Detailed Issues

The landscape and visual impact assessment for an application should be produced in accordance with the Guidelines for Landscape and Visual Impact Assessment third edition), Aberdeenshire Council's supplementary planning guidance, and the most up to date guidance on landscape and visual impact assessment of wind farms from SNH and any other relevant organisation.

The physical impact of the proposal will potentially consist of road access, any working of borrow pit material and the construction of turbine foundations. The construction of power lines and sub stations, to potentially connect the development to the national grid also needs to be taken into account. These issues need to be fully addressed in the environmental information accompanying a planning application.

It is in the applicant's interest that they carry out an in depth, accurate and comprehensive environmental impact assessment to accompany a planning application for this proposed development. Experience from other wind energy applications indicates that environmental information documents which lack information can delay the planning process.

In relation to wind energy development, it is important that the applicant fully address the issue of the settings of listed buildings and historic gardens & designed landscapes that may be visually affected by the proposed development.

The applicant indicates that the proposed scheme will utilise as far as practical existing access tracks. The designed new network of access tracks directly associated with the proposed development will need to be assessed through the EIA process and designed to minimise any environmental impacts with any mitigating measures identified and assessed.

Any proposed borrow pits will need to be identified for an EIA with information on associated operations and a site restoration plan for when the working of materials is completed.

The details of connecting cables and connection to the grid will need to be confirmed. This element of the project will need to be designed to minimise any environmental impacts.

For any areas of woodland clearance to accommodate the scheme, a forest design plan should be provided for felling and restocking (to the new forest edges) operations to manage the accommodation of any areas of the wind farm in currently existing woodland.

Generally for the scheme decommissioning process, the applicant should demonstrate a positive commitment to this element of the project. Whilst it's accepted that some environmental baseline conditions may alter in several decades time, the basic principles should be agreed to subject to review nearer the time, say within 2 years of the scheduled decommissioning operation. The principle of turbine removal, foundation area restoration, and long term management, post development, of site habitats should in principle be agreed to at this stage.

It is not recommended that advertising appear on any element of the turbines.

Given the level of public interest and objection these developments can attract, it is important that the applicant submit a comprehensive package of landscape and visual information.

Cumulative impact: The applicant needs to fully address the issue of cumulative impact in an application environmental impact assessment. Given the level of commercial scale wind energy development in the area of Clashindarroch, this proposed development will be seen in combination with otherwind energy developments in Aberdeenshire and beyond, and this issue needs to be fully addressed. Up to date records of wind energy planning applications and scoping records for Marr, as well as other Aberdeenshire development management areas should be checked to ensure all potential wind energy developments are taken into account and common viewpoints and sensitive receptors identified and appraised. The National Park Authority, and Moray Council should also be consulted regarding any wind energy applications on their sides of the authorities' boundary.

The cumulative landscape and visual impact appraisal should also be primarily graphic based, with cumulative ZTV information, panoramas, photomontages and wireline models. An assessment of cumulative visual and landscape effects should also be supplied.

The cumulative assessment information for a scheme to extend the existing Clashindarroch wind farm will be of fundamental importance to an application determining process particularly given the level of wind energy development in the area of the existing Clashindarroch Wind Farm. This issue should therefore be given an appropriate level of consideration, which given the circumstances, of the site arguably is on a par with the landscape and visual impact assessment for the proposed development on its individual merit.

The Environmental Assessment Scoping Report starts to address key issues in relation to a wind energy development. In principle to comprehensively progress the landscape

and visual impact assessment, the issues outlined in this response should be progressed as part of that LVIA process.

Roads - Kincardine & Mearns/Marr
Date Consulted: 14 February 2017

No concern relating to EIA. Road already there to serve existing turbines, a traffic management plan would be required.

Environmental Health - Marr
Date Consulted: 14 February 2017

Chapter 11.0 of the draft scoping report submitted by the applicant details how operational (and construction) noise impacts of the proposed windfarm development will be considered. It is stated within this chapter that early engagement with Environmental Health will be sought with a view to discussing background noise monitoring proposals and the approach to be taken in carrying out the noise impact assessment. Environmental Health would very much welcome the proposed early engagement and would ask that initial contact is made through the mailbox ehwindturbines@aberdeenshire.gov.uk whereupon the enquiry will be directed to an officer who will work with the developer for the duration of the planning process (where possible).
It is expected that the applicant will ensure that all current and relevant best practice guidance is followed for the duration of the planning process

I hope the above information is of assistance as a comments in relation to the draft ES, and effectively provides some further guidance in the form of a scoping opinion in respect of the relevant ES. Should other consultees provide comments in the coing weeks, I will forward them to you under separate cover. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.

This opinion will be held for public inspection for a two year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.

Yours faithfully

[redacted]

Head of Planning and Building Standards

From:	Bruce Mann <bruce.mann@aberdeenshire.gov.uk> on behalf of Archaeology <archaeology@aberdeenshire.gov.uk>
Sent:	25 April 2017 09:04
To:	Econsents Admin
Cc:	Melrose J (Joyce)
Subject:	Clashindarroch II Wind Farm, Aberdeenshire – Scoping Opinion Request – Archaeology Service Comments

Dear Joyce,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000
SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE CLASHINDARROCH II WIND FARM, CLASHINDARROCH, ABERDEENSHIRE – Archaeology Service Comments

Thank you for consulting the Archaeology Service with respect to the above Scoping Opinion. Having reviewed the Environmental Impact Assessment Scoping Report, and considered the questions raised within that report, I can confirm that an EIA will be required in this instance with regard to the historic environment. Specifically I can provide the following responses:

1) I can confirm that the proposed cultural heritage study areas are appropriate in this instance, and no changes are required.

2) Furthermore having reviewed the intended methodology as laid out within Chapter 10 'Cultural Heritage' of the Scoping Report, I can also confirm that no changes or additions are required, and that that methodology is appropriate for the EIA.

Should you have any questions on the above, or further queries regarding the proposals, then please do not hesitate to contact me.

Kindest regards,
Bruce

Bruce Mann MA MCIfA FSA Scot
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Planning & Building Standards
Infrastructure Services
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Archaeology Service for Aberdeenshire, Moray, Angus, and Aberdeen City Councils
Tel: 01224 664731 Internal 725 4731
Web Site - https://www.aberdeenshire.gov.uk/leisure-sport-and-culture/archaeology/

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FAO Joyce Melrose
Energy Consents Unit
Scottish Government

Via Email

ABZ Ref: ABZ2662

17th May 2017

Dear Joyce

Ref: SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE CLASHINDARROCH II WIND FARM, CLASHINDARROCH, ABERDEENSHIRE

I refer to your request for scoping opinion received in this office on 20th April 2017.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed site is located within the wind farm consultation zone for Aberdeen Airport and as such aviation impacts should be considered as part of the EIA.
- The proposed turbines may be detected by Aberdeen Airport's primary surveillance radar and generate clutter on air traffic control displays.
- There is currently no mitigation available at this site. In the event the turbines are predicted to be visible to our radar a safeguarding objection may be raised.

Our position with regard to this proposal will only be confirmed once the turbine details are finalized and we have been consulted on a full planning application. At that time we will carry out a full radar impact assessment and will consider our position in light of, inter alia, operation impact and cumulative effects.

Yours Sincerely
[redacted]

Kirsteen MacDonald

Safeguarding Manager
Aberdeen Airport
07808 115 881
abzsafeguard@aiairport.com

Patron Her Majesty The Queen

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Energy Consents Unit
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5 Atlantic Quay
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G2 8LU

By email to:
econsentsadmin@scotland.gsi.gov.uk
asidgwick@slrconsulting.com

31st May 2017

Dear Sir/Madam

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE CLASHINDARROCH II WIND FARM, CLASHINDARROCH, ABERDEENSHIRE

I refer to the above scoping opinion request for the proposed Clashindarroch II Wind Farm at Clashindarroch, Aberdeenshire. Apologies for the delay in responding to this scoping opinion request.

It is noted that the proposed development would comprise 16 turbines with a tip height of 149.9m. The generating capacity of the proposed development is currently unknown but it is anticipated that it would exceed 50MW.

It has been acknowledged that the intended application is for a generating station whose generating capacity exceeds 50MW and constitutes a Schedule 2 development as provided for by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (as amended 2008).

It is noted that the application site is located within Clashindarroch Forest, approximately 6km to the south west of the settlement of Huntly, Aberdeenshire. The area of the site extends to 1560ha, with the proposed wind turbines located in the southern part of the site. Access to the site would be taken from the A920 and would utilise as far as possible the existing onsite

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access tracks. The site is predominately covered by commercial forestry but has some areas of open moorland and ancient woodland.

In terms of PAN 58, the aim of such a scoping exercise is to assist the developer to identify the key environmental issues surrounding this proposal, which would be further addressed in the Environmental Statement as the project progresses.

The Aberdeenshire Local Development Plan was adopted on the 17th April 2017. Policy C2 relates to renewable energy, which states that unacceptable significant adverse effects on the amenity of dwelling houses or tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling should also be avoided.

The British Horse Society (BHS) is always pleased to be consulted on transport, planning and development matters and where possible or necessary we are able to engage local riders to get a locally based response. Thank you very much for consulting with us, horses are important and good for people so their safety and capacity to access safe off road hacking is a key consideration in terms of their welfare and the wellbeing of their riders and those who look after them.

A project, like the one you are carrying out is an excellent opportunity to improve connections in a community and hopefully resolve any problems in terms of countryside access, transport and travel.

The BHS is here to help, so please do not consider this response the final word, we hope to work with you on an on-going basis to ensure horses and horse riders get as good a deal as they can out of any proposed improvements, so please do not hesitate to contact us in the future.

I would suggest that the BHS should be consulted at the time of the full application, to allow full consideration of the Environmental Statement and other information.

The Importance of Off Road Riding

Scotland's equestrian industry is important with the horse being a major rural economic driver, recent joint research between SRUC and BHS showed:

Current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society. The expenditure on direct upkeep averages £3,105 per horse per annum.

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This report also showed:

A concern for all riders, including tourists, is diminishing access to safe off-road riding. Most riding accidents happen on minor roads in the countryside. With increasing numbers of horses and riders requiring access to the countryside, more formal access to off-road riding will be a priority in areas considered of higher risk.

The full report can be accessed at:
http://www.sruc.ac.uk/downloads/file/2391/2015_scoping_study_on_the_equine_industry_in_scotland

Scotland has a duty to get horse riders off busy roads; few riders access busy roads by choice (and the horse has as much right to be on the public highway as cars, bikes and pedestrians) - but they often have no choice as that is the only way they can access their safe off road hacking.

I can also refer you to:
http://www.rospa.com/road-safety/advice/horse-riders

Equestrian road users are vulnerable - that means they are more likely to be involved in a road accident and also more likely to suffer the worst consequences.

Horses and their riders (as well as carriage drivers) are vulnerable on the road network. A collision between a horse and a vehicle can have life threatening consequences for the horse, rider and those in a vehicle. There is evidence to suggest that the number of road traffic collisions involving horses is underreported in casualty data.

Horse riding is more prevalent (particularly on roads) in certain parts of the country. Rural areas have larger numbers of horse riders, who make a significant contribution to the rural economy. Yet according to Road Safety Scotland 70% of road accidents happen on country roads. (http://dontriskit.info/country-roads/view-the-campaign)

The BHS expects developers to work with representatives of the local horse riding community to understand their road safety and countryside access concerns and facilitate engagement with other partners and consider whether any road safety interventions should be introduced, where there are significant numbers of horse riders and/or road traffic collisions involving horses.

Under the Land Reform (Scotland) Act 2003, horse-riders and carriage drivers enjoy a right of access to most land in Scotland, provided that they behave responsibly. Land managers in turn

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are obliged to respect equestrian access rights and take proper account of the right of responsible access in managing their land. The Scottish Outdoor Access Code gives guidance on how the requirements to behave responsibly can be met. Please refer to: www.outdooraccess-scotland.com

This access legislation, which is over a decade old now gives horse riders the same rights of responsible access as walkers and cyclists. It is vital that any off road tracks or non-motorised user's tracks or paths are multi-use catering for all including horse riders and carriage drivers.

Active Travel and Suitable infrastructure

Whilst the active travel movement does not consider equestrian travel to be a form of active travel there are many people for whom riding is an attractive mode of travel whether that be for travel purposes or leisure purposes, and the delivery of Active Travel should not discourage this, just as it should not discourage the use of micro-scooters, roller blades, skateboards and other similar modes of travel. In urban areas, many riding horses are kept within the 10 mile journey distance and they must not be disadvantaged by new facilities that may be put in place for the cyclists. Level crossings which are currently used by equestrians should not be replaced by alternatives which would preclude the use by equestrians, for example, a footbridge. Similarly, other infrastructure like gates, bridges, cattle grids and slippery surfaces should all be installed with equestrians in mind. Access control must always be the least restrictive option.

The British Horse Society (BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles. With the membership of its Affiliated Riding Clubs and Bridleway Groups, the BHS is the largest and most influential equestrian charity in the UK. The BHS is committed to promoting the interests of all equestrians and the welfare of horses and ponies through education and training.

Please see attached an information sheet on equestrian access.

I trust that the above points will be addressed as part of this Scoping Opinion Request and I look forward to providing more specific information at the time of the application.

JULIE HANNA
SCOTTISH REGIONAL MANAGER
THE BRITISH HORSE SOCIETY

Patron Her Majesty The Queen

Julie Hanna (Scotland)
Woodburn Farm
Crieff
Perthshire
PH7 3RG

Email Julie.hanna@bhs.org.uk
Website www.bhsscotland.org.uk
Tel 024 76 840710
Mob 07900 670223

Fulfilling your passion for horses

The British Horse Society Abbey Park, Stareton, Kenilworth, Warwickshire CV8 2XZ

Information Sheet 11

Equestrian Access

The aim of this Information Sheet is to convey the general principles relating to equestrian access.

Introduction

Many people involved in the design and management of outdoor access feel they lack the required knowledge or confidence to deal adequately with equestrian access.

Riders are no different to walkers and cyclists. They vary considerably in their interests, needs and preferences. As with other users, the access provider should aim to provide a variety of routes, surfaces and experiences, and to take into account the needs, aspirations and constraints of all users.

There is no substitute for first-hand experience – by far the best way of appreciating the needs of horses and riders is to try for yourself from the saddle. Local riding schools, horse access groups or BHS volunteers will usually arrange for access providers to get on a horse and experience for themselves the thrills and frustrations of equestrian access. Remember that local riders and horse-owners will often be willing to help plan and implement routes.

Understanding horses, riders and their needs

The average weight of a horse is 500kg, and average size of a horse's hoof varies from 110mm to 250mm diameter. Depending on pace, only two hooves may be in ground contact simultaneously, hence a considerable weight is concentrated on a very small area. Because of this, one of the greatest risks for horses is boggy ground where they may get stuck and holes in which they may strain or break a leg. Either can have fatal consequences.

Minimum height of a mounted rider is 2.55m above ground level. Overhanging branches and any other obstructions should be cleared to a minimum of 3m (preferably 3.7m) on all riding routes.

Horses require a minimum 2.9m diameter turning space. It is particularly important to 'design in' this space by the sides of gates. At gated junctions between paths and vehicular roads, always ensure the gate is set well back to give sufficient manoeuvring space away from the carriageway.

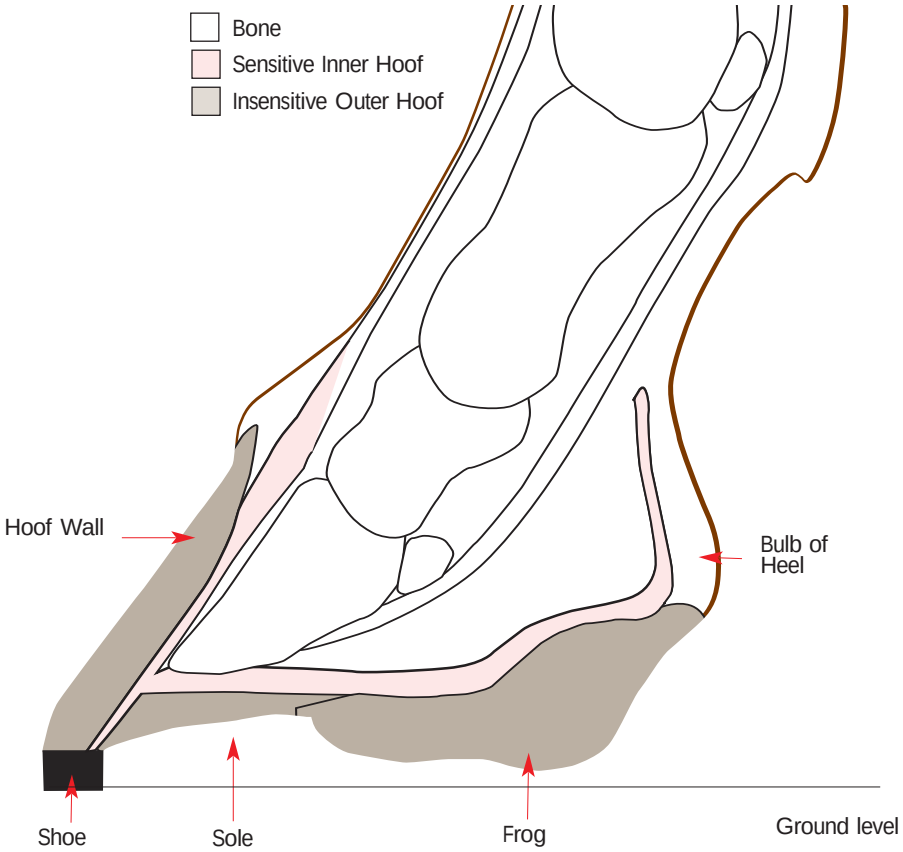
Adequate turning space and safe loading/unloading areas are essential where parking is provided

Paths from a horse's perspective

for horse boxes/trailers.
A simple knowledge of the anatomy of the horse's feet and legs provides an insight into the implications of path surfacing. The horse's foot comprises an insensitive outer layer of horny tissue, which surrounds and

Structure of the horse's hoof

Cross section through hoof showing sensitive and insensitive areas



Information Sheet 11

Paths from a horse's perspective cont.

protects sensitive inner structures.
The unshod surface of the hoof comprises the sole, the hoof wall, and the central "frog", which helps absorb concussion and pump blood through the hoof.
The sole is derived from the very sensitive membrane that covers the pedal bone, and although it may appear hard, it is in fact relatively thin and easily bruised.

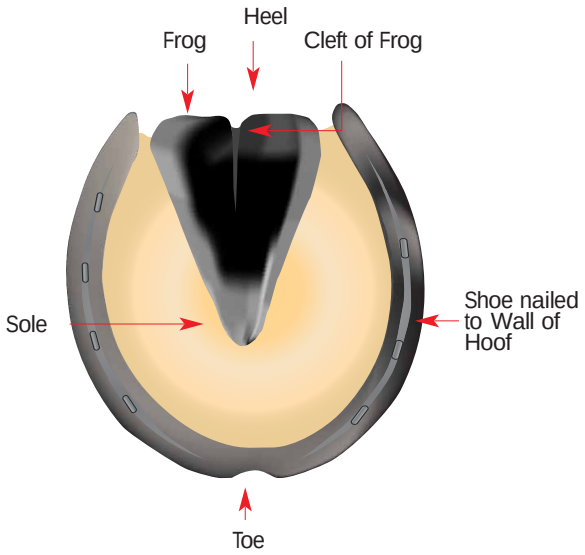
Most horses in regular work are shod with metal shoes, which are designed to protect the hoof wall (the main bearing surface) from excessive wear,

Path surfaces

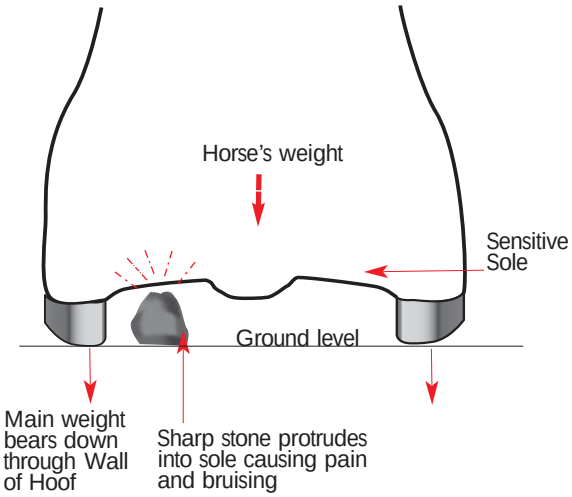
and to evenly spread the load of horse and rider around the hoof wall.
On flat, compacted surfaces, the naturally arched sole will not come into contact with the path. However, on unconsolidated surfaces, sharp stones may
protrude into and bruise the sole, causing lameness. Similarly loose stones, even small pea gravel, may become wedged in the hoof, exerting painful pressure on the underlying tissues each time the horse bears weight on the hoof. Infection and swelling within the hoof resulting from stone punctures can cause serious problems.

The level of concussion to both the hoof and horse's legs increases with the hardness of the surface, and with the speed at which the horse is moving. Trotting or cantering on tarmac or hard tracks will soon lame a horse by placing strain on the legs, potentially resulting in permanent impairment. Grass tracks, which provide ideal fast going for much of the year, can bake sufficiently hard in dry weather to restrict horses to a walk.

Underside of the hoof



Cross section through hoof showing potential pressure and damage from sharp stones



Information Sheet 11

Paths from a rider's perspective

Depending on time of year and ground conditions, every surface can present problems or opportunities.
The basic functions of path surfacing for horses are the same as those for any other users: to facilitate travel, to protect the site and to contribute to the user's enjoyment while travelling.

Paths should be safe by being relatively non-slip and with a firm base.

Paths should have a comfortable surface for the horse, which avoids the risk of bruising the sole of the hoof.

Paths should offer scope for a range of pace. Some riders may only want to walk (e.g. inexperienced riders or unfit horses). Most riders, however, look for the opportunity to trot, canter and occasionally gallop. Hard surfacing to improve the surface for other users, or to restrict the pace of horses, may prompt riders to look for alternative paths in the vicinity for faster riding.
The most popular types of paths for horse-riders, in descending order of preference, are as follows:

- Short, firm, well-drained turf.
- Vegetated paths on firm base such as grassed over forest roads or disused railway tracks stripped of ballast to expose consolidated ash solum.
- Paths where the natural vegetation is protected or reinforced by some type of surfacing.
- Constructed paths with firm, non-slip surface.

Acknowledgement and Further Information

This Information Sheet is based on a detailed, technical Factsheet covering path construction and surfacing; gates; and bridges, water and road crossings prepared by the British Horse Society in conjunction with the Paths for All Partnership and Scottish Natural Heritage. It is available from the British Horse Society, the Paths for All Partnership's web site or from its office in Alloa.

4 May 2017
Your reference:

Our ref.WID10613

Dear Sir/Madam,

RE: PROPOSED Clashindarroch II Wind Farm

Dear Sir/Madam

Thank you for your email.

We have studied this wind farm proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that the project should not cause interference to BT's current and presently planned radio networks.

Regards

Yours sincerely

Dale Aitkenhead
BT Network Radio Protection

CLASHINDARROCH II WIND FARM SCOPING

Our Reference : PRE/2017/012

GENERAL

The Cairngorms National Park Authority and SNH operate a protocol for commenting on developments outside the National Park in relation to impacts upon the National Park. This gives SNH the lead role for considering impacts on the National Park designation of proposals outside the Park, with the CNPA supporting. It sets out that National Park Authorities and SNH, with others, share a responsibility for delivering National Park Partnership Plans and safeguarding the integrity of the National Parks and their special qualities. More information on this link
http://www.snh.gov.uk/docs/A915019.pdf

At this stage CNPA are providing initial comments to assist the applicants at the scoping stage in making a submission which fully considers impacts upon the Cairngorms National Park.

PLANNING POLICY CONTEXT

The Planning Statement should include reference to, and consideration of, the Cairngorms National Park Partnership Plan.

Section 11 of the National Parks (Scotland) Act 2000 sets out the responsibility to produce a national park plan and to ensure that the aims of the National Park are collectively achieved in a coordinated way. Decision makers in exercising functions so far as affecting a National Park require to have regard to the National Park Plan. It is therefore important that the provisions of the National Park Plan are considered in the policy section of any submission.

The Cairngorms National Park Partnership Plan 2012 – 2017 (NPPP) is the current adopted plan and is available on this link.
http://www.cairngorms.co.uk/resource/docs/publications/21062012/CNPA.Paper.1827.Cairngorms%20National%20Park%20Partnership%20Plan%202012-2017.pdf

This Plan is presently being reviewed and a new plan is currently with the Scottish Ministers with a view to approval in the summer. The new plan is generally consistent with the provisions and policies of the current NPPP and will need to be referred to dependent on the timing of the submission.

The NPPP sets out the vision and overarching strategy for managing the National Park and explains that the conservation and enhancement of the environment is central to National Parks achieving their purpose, underpinning delivery of all four aims, and integral to the sustainable development necessary to support communities and businesses. The vision for the National Park is an outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together. Three long term outcomes are set out as follows with the Plan explaining what these will mean in detail:

a) A special place for people and nature with natural and cultural heritage enhanced;
b) People enjoying the Park through outstanding visitor and learning experiences;
c) A sustainable economy supporting thriving businesses and communities.

The Plan emphasises the importance of the special qualities of the National Park and sets out principles for conserving and enhancing them on page 20. This includes thinking beyond the boundary of the National Park in that the special qualities are connected to and benefit the surrounding area as well as being influenced by what happens around the Park. It further notes that cross boundary effects of activities on the special qualities of the National Park should be considered in managing change both in and around the National Park. With regard to the current proposal key policies which should be considered are:

Policy 1.3 which seeks to support development of a low carbon economy and states that "large scale commercial wind turbines are not compatible with the special qualities of the National Park and are not considered to be appropriate within the National Park or where outside the Park they affect its landscape setting." Large scale is defined as more than one turbine and more than 30 metres in height.

Policy 2.3 which seeks to conserve and enhance the special landscape qualities with a particular focus on conserving and enhancing wildness qualities; maintaining and promoting dark skies; enhancements that also deliver habitat improvements; and enhancing opportunities to enjoy and experience the landscapes of the Park.

(The special landscape qualities of the Cairngorms National Park are described in a report by SNH entitled "The Special Landscape Qualities of the Cairngorms National Park" as referred to in our Landscape Advisor's report.)

It is against this background that we (CNPA/SNH) would be considering the impacts of the proposed development.

As noted in the scoping report Scottish Planning Policy will also be a material consideration and of particular note in relation to the National Park are paragraphs 84-85 and 212 -213.

LANDSCAPE AND VISUAL ASSESSMENT

The comments of our Landscape Advisor are attached and these set out key matters to be considered with any submission in order for ourselves and SNH to comment as consultee in relation to the impacts on the National Park.

As highlighted by our Landscape Advisor the following should be addressed

- Boundary of Cairngorms National Park to be clearly shown on all material
- Visualisations to be provided from Little Geal Charn in the Ladder Hills including a cumulative visualisation.
- Consideration of impacts on special landscape qualities (including wildness) all as outlined by our Landscape Advisor. (The study referred to in relation to the Dorenell PLI can be provided if the applicants cannot find it readily on the DPEA website)

In addition it would be helpful for us when reporting any consultation to our Planning Committee if an indication of the route of the connection to the grid was provided.

Katherine Donnachie

Cairngorms National Park Authority

9 May 2017

Clashindarroch II Wind farm, Aberdeenshire : Scoping report

INTERNAL SPECIALIST RESPONSE FORM

Internal Specialist : Frances Thin, Landscape Adviser 27/4/2017

Interests affected by proposal Landscape

Appraisal of impacts :

The preliminary information (site plans and ZTV based on 16 No. wind turbines of 149.5m height) is for a site north east of the National Park about 11km from the Park boundary at its closest point. Looking out from the Park, the 16 proposed turbines would sit beyond the 18 turbines of the existing Clashindarroch wind farm (built in 2015, turbines 110m high)

Possible Significant Effects

1. Landscape Character and Setting

The landscape setting of the Park on this side is to a large extent determined by the continuity of the high moorland hills as they flow across the boundary and extend north-eastwards. (on the SNH LCA map of landscape character areas this is shown as the upland and moorland landscape character types of CNG3, ABS4 and MRN4.) The proposed wind farm sits north of the valley of the Cabrach. This area of marginal farmland is quite different from the surrounding hills but is little-visible from the Park. This sense of character continuity is experienced from elevated locations along the northern and north eastern edges of the NP and particularly from the Ladder Hills. **In my view this wind farm will be within the landscape setting of the CNP and will have an effect on the experience of character and the landscape setting. However, owing to distance and the presence of the existing wind farm the effect will in my view not be significant.**

Clashindarroch I from the Ladder Hills

2. Landscape and Visual Effects

Extent of visibility

The preliminary ZTV (blade tip) identifies the areas with theoretical visibility of the wind farm. These include visibility from;

- the Ladder hIlls from approx. 15km to 18km,
- the hills west of the Lecht, the hills of Carn Mor and Geal Charn north of Strathdon all at about 25km
- the high ground west of the old military road between Strathdon and Glen Gairn at about 30km to 35km.
- the hills between Ballater and Glen Tanar at 35km to 40km

Overall, the extent of visibility across the National Park looks likely to be limited, with much of this beyond 25km

Visual Impact and Design

There are no wirelines submitted with the scoping report but there may be adverse visual effects arising from the close juxtaposition of the two wind farms and the different heights of the turbines (Clashindarroch I turbines are 110m high and the proposed

turbines for Clashindarroch II are 149.5m high). **It is important that the LVIA contains visualisations from Little Geal Charn in the Ladder Hills to inform the assessment of these effects and to identify any possible mitigation.**

Cumulative Effects on the CNP

As well as the operational Clashindarroch I windfarm which is immediately adjacent to the proposed windfarm, the consented wind farm of Dorenell (59 tbs) is in close proximity and also the operational Kildrummy wind farm (8 tbs).

A cumulative visualisation should be prepared for the Little Geal Charn viewpoint to assess the additional landscape and visual impact resulting from the Clashindarroch II wind farm, as seen from within the National Park.

3. Special landscape qualities

The part of the Park most likely to be affected by this wind farm is the Ladder Hills. The special landscape qualities most strong exhibited in these high rolling moorland hills are:

- The surrounding hills
- Extensive moorland, linking the farmland, woodland and the high tops
- Dominance of natural landforms
- Wildness
- Layers of receding ridge lines
- Grand panoramas and framed views
- A landscape of opportunities

Understanding these qualities and how they are impacted upon by a proposal is a necessary part of undertaking the policy tests in statute[1] and Scottish Planning Policy[2].

The ES should include **a consideration of the impacts of the Clashindarroch on the SLQs experienced in the Ladder Hills sufficient for the policy tests to be undertaken**. This assessment will be informed by the visualisations and the assessment of landscape and visual effects outlined above and by the significant adverse effects of the Dorenell windfarm on the SLQs of the Ladder Hills (Assessed elsewhere in relation to the current Public Local Inquiry for Dorenell Wind Farm- DPEA reference WIN-300-2. CNPA/SNH Production LV035 plus supporting figures refers) In the light of the over-riding impacts of the Dorenell wind farm on the same area from which the Clashindarroch wind farm will be visible, my advice is that a detailed SLQ impact assessment for Clashindarroch II is unlikely to be required. At the time of writing there is no published guidance on assessing the impact of development on Special Landscape

[1] National Parks Act 2000

[2] Scottish Planning Policy (2014) paragraph 212

Qualities but CNPA/SNH can provide interim guidance on request.

4. **Wildness and Wild Land**

The proposed wind farm may affect the sense of wildness as experienced in the Ladder Hills. The Ladder Hills are not within a Wild Land Area and **effects on the sense of wildness should be considered within the assessment of effects on Special landscape Qualities.**

Planning Context

The Scoping report makes no reference to the CNP NPPP in the Planning policy context and there is no reference to the CNP and special landscape qualities in the Landscape and Visual section.

Information required in a future planning application

1.0 LVIA taking into account all issues raised above

2.0 Viewpoints

We agree with the list of viewpoints within the scoping report. For clarity the Ladder Hills viewpoint must be Little Geal Charn in the Ladder Hills

The choice of the precise location for photography should be informed by consideration of both blade and hub ZTVs and site visits.

3.0 Baseline Conditions

a) For the Cairngorms National Park

All maps, and especially ZTV maps, should include the up-to-date National Park Boundary. The CNP boundary can now be used freely for any publication under the OS Opendata terms see http://www.ordnancesurvey.co.uk/oswebsite/products/os-opendata.html.)Free to use terms require the OS Opendata acknowledgement to be shown on the map.)

b) For Landscape Character Information

The baseline for landscape character should be taken from SNH's national coverage of Landscape Character Assessments and the Cairngorms National Park LCA (2009) http://cairngorms.co.uk/caring-future/cairngorms-landscapes/landscape-areas/

c) For Special Landscape Qualities

The baseline for Special landscape Qualities should be taken from http://www.snh.org.uk/pdfs/publications/commissioned_reports/375.pdf . Information on

the special landscape quality of wildness in CNP is available at http://cairngorms.co.uk/resource/docs/publications/24112011/CNPA.Paper.1771.Wildness.pdf

d) For Wild Land

The map of Scotland's Wild Land Areas can be found at http://www.snh.gov.uk/protecting-scotlands-nature/looking-after-landscapes/landscape-policy-and-guidance/wild-land/mapping/ and guidance on assessing impacts on wild land at http://www.snh.gov.uk/docs/A1418983.pdf

Assessment *in relation to your area of expertise in the event of the submission of a planning application*

From the information provided it is my view that with a wind farm development of 16 149.5m turbines on this site the possible significant effects on the CNP are;

- landscape and visual effects arising from the close juxtaposition of the two Clashindarroch wind farms which may require design changes to minimise adverse effects on the NP
- cumulative effects as experienced from the NP

In my view, it is unlikely that Clashindarroch II will have significant adverse effects on the landscape setting of the National Park or upon the SLQs experienced in the Ladder Hills. However, the ES should contain sufficient information and analysis in respect of these topics for the policy tests to be undertaken (NPPP policies 1.3 and 2.3 and SPP para 212).

Defence Infrastructure Organisation

Claire Duddy
Assistant Safeguarding Officer
Ministry of Defence
Safeguarding – Wind Energy
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Telephone [MOD]: +44 (0)121 311 3714
Facsimile [MOD]: +44 (0)121 311 2218
E-mail: DIOSEE-EPSSG2a1@mod.uk

Your Reference: Clashindarroch II

Our Reference: DIO10039732

Joyce Melrose
The Scottish Government

12th May 2017

Dear Ms Melrose

Please quote in any correspondence: DIO10039732

Proposal: Scoping Opinion for proposed Section 36 Application for the Clashindarroch II Wind Farm, Clashindarroch, Aberdeenshire

Thank you for consulting the Ministry of Defence (MOD) about the above planning application in your communication dated 19th April 2017.

I am writing to advise you that the MOD objects to the proposal. Our assessment has been carried out on the basis that there will be 16 turbines, 149.5 metres in height from ground level to blade tip and located at the grid references below as stated in the planning application or provided by the developer:

Turbine	Easting	Northing
[redacted]	[redacted]	[redacted]

Air Defence (AD) radar

The turbines will be 66.7km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Buchan.

Wind turbines have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and deter aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

An operational assessment has been conducted by an AD Subject Matter Expert (SME) who considered the position of the turbine(s) weighed against a number of operational factors including:

a. Detectablity of the turbine(s).
b. Position of the development.
c. Number of turbines within the development.
d. Other developments within the vicinity.

Close examination of the proposal has indicated that the proposed turbine(s) would have a significant and detrimental affect on AD operations. The MOD therefore has concerns with the development. The reasons for this objection include, but are not limited to:

a. 15 of the turbines are detectable by the AD Radar at RRH Buchan
b. The number of the turbines visible to the radar would exceed the 'cumulative effect' thresholds.

Research into technical mitigation solutions is currently ongoing and the developer may wish to consider investigating suitable mitigation solutions.

If the developer is able to overcome the issues stated above, the MOD will request that the perimeter turbines be fitted with MOD accredited 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

MOD Safeguarding wishes to be consulted and notified about the progress of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

I hope this adequately explains our position on the matter. Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

***MOD*:** https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding

Yours sincerely

Claire Duddy
Assistant Safeguarding Officer – Wind Energy
Defence Infrastructure Organisation

SAFEGUARDING SOLUTIONS TO DEFENCE NEEDS

From: Brian Davidson <brian@fms.scot>
Sent: 12 May 2017 15:20
To: Econsents Admin
Cc: Richie Miller
Subject: RE: Clashindarroch II Wind Farm, Clashindarroch, Aberdeenshire

Thank you for your correspondence concerning the proposed wind farm at Clashindarroch, by Huntly.

Fisheries Management Scotland (FMS) represents the network of 41 Scottish District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries and the 26 fishery trusts who provide a research, educational and monitoring role for all freshwater fish.

FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal.

The proposed development falls within the district of the Deveron District Salmon Fishery Board, and the catchments relating to the Deveron, Bogie & Isla Rivers Charitable Trust. It is important that the proposals are conducted in full consultation with these organisations (see link to FMS member DSFBs and Trusts below). We have also copied this response to these organisations.

Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.

- LINK TO ADVICE ON TERRESTRIAL WINDFARMS
- LINK TO DSFB CONTACT DETAILS
- LINK TO FISHERY TRUST CONTACT DETAILS

Regards,

Brian Davidson | Dir Communications & Administration
Fisheries Management Scotland
11 Rutland Square, Edinburgh, EH1 2AS
Tel: 0131 221 6567 | 075844 84602
www.fms.scot

Grampian Conservancy
Portsoy Road
Huntly
Aberdeenshire
AB54 4SJ

Tel 01466 794542
Grampian.cons@forestry.gsi.gov.uk

Conservator
James Nott

Joyce Melrose
Energy and Consents Unit
The Scottish Government

Via e-mail econsentsadmin@gov.scot

12th May 2017

Dear Joyce

RESPONSE TO SCOPING REPORT FOR PROPOSED SECTION 36 APPLICATION FOR CLASHINDARROCH II WINDFARM

Forestry Commission Scotland (FCS)
FCS works as part of Scottish Government to protect and expand Scotland's forests and woodlands and so has an interest in developments that have the potential to impact on local forests, woodlands or the forestry sector.

FCS should be considered as the main forestry consultee and should be consulted throughout the development of the proposal to ensure that proposed changes to any woodland are appropriate and address the requirements of the Scottish Government's Policy on Control of Woodland Removal and the UK Forestry Standard.

Relevant discussion on forestry matters should take place prior to the submission of an Environmental Statement and developers and their consultants should allow sufficient time in their project plan to accommodate such advice. Developers should consult the Grampian Conservancy office that can be accessed at: http://scotland.forestry.gov.uk/supporting/management/conservancies.

Clashindarroch II Site
Ancient Woodland is present on the development site (Scoping Report: figure 8.1), the Scottish Government's Policy on Control of Woodland Removal, stipulates that there is a strong presumption in favour of protecting woodland resources and a strong presumption against removing this type of woodland. All effort should be made to prevent any loss of this nationally important resource and if development operations are to occur in close proximity to this area a Tree Protection Plan should form part of the forestry chapter in the ES.

Scottish Government Policy on the Control of Woodland Removal (2009)
http://www.forestry.gov.uk/pdf/fcfc125.pdf/$FILE/fcfc125.pdf

The windfarm is proposed within commercially managed woodland, it is necessary to highlight that areas within the development site that have recently been felled were done so under approval from FCS and have restocking obligations attached. These areas are still considered woodland under the Scottish Government's Policy on Control of Woodland Removal.

The location of the on-site substation where the grid transmission lines connect to the windfarm should be considered carefully, with its location designed so it and the subsequent grid connections minimise impact on the forest environment.

Responses to Scoping Questions
FCS is content that a dedicated forestry chapter will be produced as part of the ES and that the surveys relating to the forest environment carried out to date are sufficient. However, FCS recommends that in light of the semi-natural ancient woodland on the development site, "Ancient Woodland" should be included in the

list of detailed assessments to be completed as part of the ecological impact assessment outlined in chapter 8.2.1 of the scoping report.

Background Information
Forest Management required for the development should be designed with consideration of the following issues.

Forestry and Woodland
Scotland's woodlands and forestry are an economic resource, as well as an environmental asset, as stated in the third National Planning Framework (para 4.23 http://www.scotland.gov.uk/Resource/0045/00453683.pdf).

There is a strong presumption in favour of protecting Scotland's woodland resources. For this reason the Scottish Government published a policy on control of woodland removal in 2009 http://www.forestry.gov.uk/PDF/fcfc125.pdf/$FILE/fcfc125.pdf (refer Scottish Planning Policy paragraph 218).

The policy aims to protect the existing forest resource in Scotland and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with development, a proposal for compensatory planting may form part of this balance.

The criteria for determining the acceptability of woodland removal and further information on the implementation of the policy is explained in the policy on control of woodland removal. These should be taken into account when preparing the development plans for a wind farm proposal. Beyond this, applicants should refer to guidance documents issued by Forestry Commission in relation to good forestry practice, sustainable forest management and environmental management.

Woodland Management and Tree Felling
The first consideration for any development within a forest should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Design approaches which reduce the scale of felling required to facilitate the development should be considered and integration of the development with the existing woodland structure is a key part of the consenting process.

Where a developer intends to construct a windfarm within a forest, partially within a forest, or that will affect the forest environment, it is important that pre-application discussions takes place with Forestry Commission Scotland (FCS), the planning authority and other relevant key agencies, at the earliest possible stage of the project, to ensure all parties have a shared understanding of the nature of the proposed development, information requirements and the likely timescale for determination. This collaborative approach will ensure that all forestry issues are identified and mitigated at the earliest opportunity.

The developer should consider the potential cumulative impact of the proposed development in respect to the local and regional context. This should include consideration of potential cumulative impact of proposed woodland removal, when considering existing development in the surrounding woodland. In particular consideration needs to be given to the implication of felling operations on such things as habitat connectivity, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans.

Environmental Statement
The Environmental Statement should include a stand-alone chapter on woodland management and tree felling that describes and recognises the social, economic and environmental values of the forest and the woodland habitat and take into account the fact that, once mature, the forest would have been managed into a subsequent rotation, often through a restructuring proposal that would have increased the diversity of tree species and the landscape design of the forest.

The chapter should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The baseline should be prepared from existing records, site surveys and aerial photographs.

The chapter should clearly indicate proposed areas of woodland for felling to accommodate new turbines, access roads and other infrastructure. Details of the area to be cleared around those structures should also be provided, along with evidence to support the proposed scale and phasing of felling. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme. The felling plan should clearly identify which areas are to be felled and when.

Trees cleared for turbine bases, access roads and any other wind farm related infrastructure must be replaced by replanting on-site or on an alternative site (compensatory planting). Therefore a restocking plan should also form part of this chapter, the plan should show which areas are to be replanted and when during the life of the windfarm. The plan should clearly identify and describe the restocking operations including changes to the forest area and species composition, with detail and timing of the full work programme, including information on the maintenance and protection programme up to establishment.

Details of the proposed mitigation should not be left to post-consent Habitat Management Plans (or others) to decide and implement. The specifics of the proposed mitigation should be included in a Compensatory Planting Plan, appropriately described in the Environmental Statement, as they are vital in understanding the development in full.

Windfarm Forest Plan
Integration of the windfarm into future forest design plans is a key part of the development process. Applicants are therefore advised to prepare a Long Term Forest Plan, alongside their Environmental Statement, that provides a strategic vision to deliver environmental benefits through sustainable forest management and describes the major forest operations over a 20 years period. Such a plan should be presented to the planning authority, as a technical appendix as part of the Environmental Statement, for context.

UK Forestry Standard
Felling operations and compensatory planting (if relevant) must be carried out in accordance to good forestry practice as defined in the UK Forestry Standard (UKFS). The UKFS, supported by a series of guidelines, is the reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring. The Scottish Government expects all forestry plans and operations in Scotland to comply with the standards. FCS therefore expect for Environmental Statement developed for wind farms (and other projects that impact on forests) to clearly state that the project will be developed and implemented in accordance with the UKFS and associated guidelines. A key component of this is to ensure that even-age woodlands are progressively restructured in a sustainable manner: felling coupes should be phased to meet adjacency requirements and their size should be of a scale which is appropriate in the context of the surrounding woodland environment.

Yours sincerely

[redacted]

Ian Cowe
Development Officer
Forestry Commission Scotland - Grampian Conservancy

Cc Alison Sidgwick, SLR Consulting Ltd

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

Scottish Government
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our ref: AMN/16/GB
Our case ID: 300019748
Your ref: 405.03640.00011
18 May 2017

Dear Sir/Madam,

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000
Clashindarroch II Wind Farm
Scoping Report

Thank you for your consultation which we received on 10 April 2017 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

Aberdeenshire Council's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development
I understand that the proposed development comprises the construction of in the order of 16 wind turbines (tip height: 149.9m) and associated infrastructure near Huntly in Aberdeenshire.

Scope of assessment
While we can confirm that no heritage assets within our remit are located within the development site boundary, we consider that the proposals may give rise to significant impacts on the setting of a number of heritage assets located within its vicinity. In particular, we consider that attention should be paid to potential impacts on the setting of the below heritage assets as part of any Environmental Impact Assessment (EIA) undertaken for the proposed development.

- *Beldorney Castle (Category A listed building, LB9164)*

  This Category A listed building is of mid-16th century origin, and is one of the first examples of a Z-plan tower house in the North East. An important feature of the building is its attractive rural setting within the undulating landscape of the Deveron Valley. While much of the building is secluded in woodland, the Castle and its associated gardens also experience open south eastern views along the valley toward the hill ranges beyond.

  The proposed development site boundary is also located to the south east of the building. While we note that the ZTV for the proposed development shows limited visibility of the turbines within the Deveron Valley, we consider that any EIA undertaken for the proposed development should include a full assessment of impacts on the setting of the Castle. This should include a full appreciation of important views to and from the Castle, as well as photomontage or wireframe visualisations demonstrating whether impacts, including cumulative impacts, will occur.

- *Wormy Hillock, henge 690m WNW of Finglenny (Scheduled Monument, Index No. 3278)*

  This monument comprises a late Neolithic or Early Bronze Age henge measuring 6.2m by 5.4m across and surrounded by a 4.3m wide ditch and a 4-5m wide bank. The monument is situated below the south eastern end of a natural mound on the left bank of the Ealaiche Burn. Because of its role as a ceremonial or ritual monument, views from and towards the monument are important in terms of its setting.

  The proposed development site boundary is located approximately 1 km to the north west of the monument. While we note that the monument appears outside the ZTV for the development, we consider that this is possibly because it is presently surrounded by forestry plantations. We recommend therefore that any EIA undertaken for the proposed development should assess impacts on the henge. This assessment should take into account Historic Environment Scotland's Managing Change guidance note on Setting, which identifies that forestry cannot necessarily be relied upon to mitigate impacts on the setting of the monument, and that views of the turbines may be opened up if trees are felled. It would therefore be helpful if a photomontage and wireframe visualisation looking towards the wind farm is included within the assessment to demonstrate likely impacts in this case.

- *Tap o'Noth, fort (Scheduled Monument, Index No. 63)*

  This monument comprises an Iron Age hillfort situated on Tap O' Noth and is described as being one of the largest and most spectacular forts in Scotland. Consisting of 21 ha, the fort includes more than 100 house platforms between the stone rampart and wall, and a rock cut well or cistern. Situated at 563m OD, the fort commands views a huge sweep of the north east of Scotland, including the North Sea to the east, and the Moray Firth, Sutherland and Caithness in the north. Given its role as a defensive structure and its elevated location in the landscape, views from and towards the monument are important in terms of its setting.

  The proposed development site boundary is located approximately 4.5 km to the NW of the fort. We welcome that the Scoping Report has identified the monument as a viewpoint from a LVIA perspective. However, we consider that an EIA should also include an assessment of impacts on the setting of the fort as a cultural heritage feature. This should allow for a full appreciation of the setting of the fort, taking into account views both from and towards it. We consider that two photomontages and wireframes should be included in the cultural heritage assessment; (i) a view taken from the monument looking towards the turbines, and (ii) a view (or views) looking towards the fort from the surrounding landscape with turbines appearing behind it.

- *Gallows Hill Cairn, 460m SSE of Lesmoir (Scheduled Monument, Index No. 11576)*

  This monument comprises a probably Bronze Age earth and stone burial mound measuring 20m across and 2m high. The placename suggests later use as the site of a gallows. The cairn is situated in semi-improved pasture on the NE flank of The Peirk, 460m SSE of Mains of Lesmoir and extensive views are possible from it.

  Given its role as a ceremonial or ritual monument, views from and towards the cairn are important in terms of its setting. The proposed development site boundary is located approximately 4.7 km to the NW, and this distance may help to mitigate impacts on the setting of the cairn. If within the ZTV, it would be helpful if a wireframe visualisation looking towards the wind farm is included to demonstrate the likely impact, including the cumulative impacts.

- *Auchindoun Castle, castle and fort (Scheduled Monument, Index No. 90024)*

  This monument comprises a 15th century L-plan tower house with an underlying Iron Age hillfort. As well as being a scheduled monument, the castle is also a Property in the Care of Scottish Ministers. The monument's strategic and elevated position in the landscape enabled it to control movement, particularly over the Glen Fiddich route to the south, and also to be an impressive feature within the

landscape. In light of this, outward views from the castle and views towards it are important parts of its setting.

The proposed development site boundary is located approximately 8km to the NW. It is presently unclear from the ZTV how visible the turbines are likely to be and whether they would appear on any ridgelines which are visible from the monument. While the distance may help to mitigate impacts, given the sensitivity of the monument and the number of proposed and consented wind farm schemes, we would however welcome an assessment of impacts on this site. It would be helpful if this includes a photomontage and wireframe looking towards the wind farm to demonstrate the likely impact, including the cumulative impact.

The above list is not exhaustive, and we would recommend that ZTV analysis is undertaken to select additional heritage assets for assessment that may be affected by the proposals. In line with this, we do not consider that the 5km assessment area identified within the EIA Scoping Report is sufficient in this instance.

As above, we would also recommend that any EIA undertaken for the proposed development is supported by appropriate visualisations such as photomontage and/or wireframe views. Visualisations should be provided where impacts are likely to be highest. We suggest that any cumulative impacts resulting from this development in combination with other existing and proposed wind farm developments within the surrounding area should also be carefully considered. This should also be examined through the use of cumulative visualisations.

While assessing the impact of this development on setting, we would recommend consulting our Managing Change guidance notes, which can be found at: https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=80b7c0a0-584b-4625-b1fd-a60b009c2549.

Further information on the EIA process can be found on our website at https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/environmental-assessment/

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on 0131 668 8575 or by email on Alison.Baisden@hes.scot.

Yours sincerely,

Historic Environment Scotland

RESPONSE FROM HUNTLY NORDIC SKI CLUB TO THE CLASHINDARROCH II WIND FARM EXTENSION ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT (April 2017)

DATE: 29th April 2017
AUTHOR: Peter Thorn, Secretary, Huntly Nordic Ski Club.

INTRODUCTION.

The Huntly Nordic Ski Club (the Club) was formed in 1998 and has a membership of 137. We are members of our national governing body, Snowsport Scotland (SSS). The Huntly Nordic & Outdoor Centre (HNOC) is owned and managed by Aberdeenshire Council. The Club works closely with HNOC to promote cross-country (Nordic) skiing, in particular together we run various junior programmes, after-school clubs.

BACKGROUND TO THE CLASHINDARROCH FOREST SKI TRAILS.

The Clashindarroch Forest has been long recognised as the best snow-holding forest in Scotland (UK) and the Scoping Report accurately quotes our snow records of an average 45 skiing days each year with up 118 days (13.1, p.48). Skiers travel from all over Scotland and even from the rest of the UK to ski on the trails. Many attending courses given by HNOC.

In the early 1980's the Army held cross-country and biathlon competitions in the forest. With permission and support of the Forestry Commission a designated area for cross-country has been established in the Clashindarroch Forest since the early 1990's ski trails were regularly groomed in the forest. These cross-country ski trails were initially maintained by HNOC but in more recent years the Club purchased a new snowmobile and have taken over main responsibility for grooming the ski trails. The Club has built a hut in the forest that is open for use by all forest users. And most recently funded the construction of a new 850m ski trail. We hold on-snow events/races.

Over the past 15 years many young skiers from the Club have gone on to ski at senior international level at both cross-country and biathlon. Five Huntly skiers have skied at one or more Olympic Games. Many of these skiers learnt to ski in the Clashindarroch along with hundreds, possibly thousands, of other recreational skiers over the past 20 years. The Club has, and continues to, devote a large amount of time, resources and finance into enhancing skiing in the forest.

POTENTIAL IMPACT OF PROPOSED DEVELOPMENT.

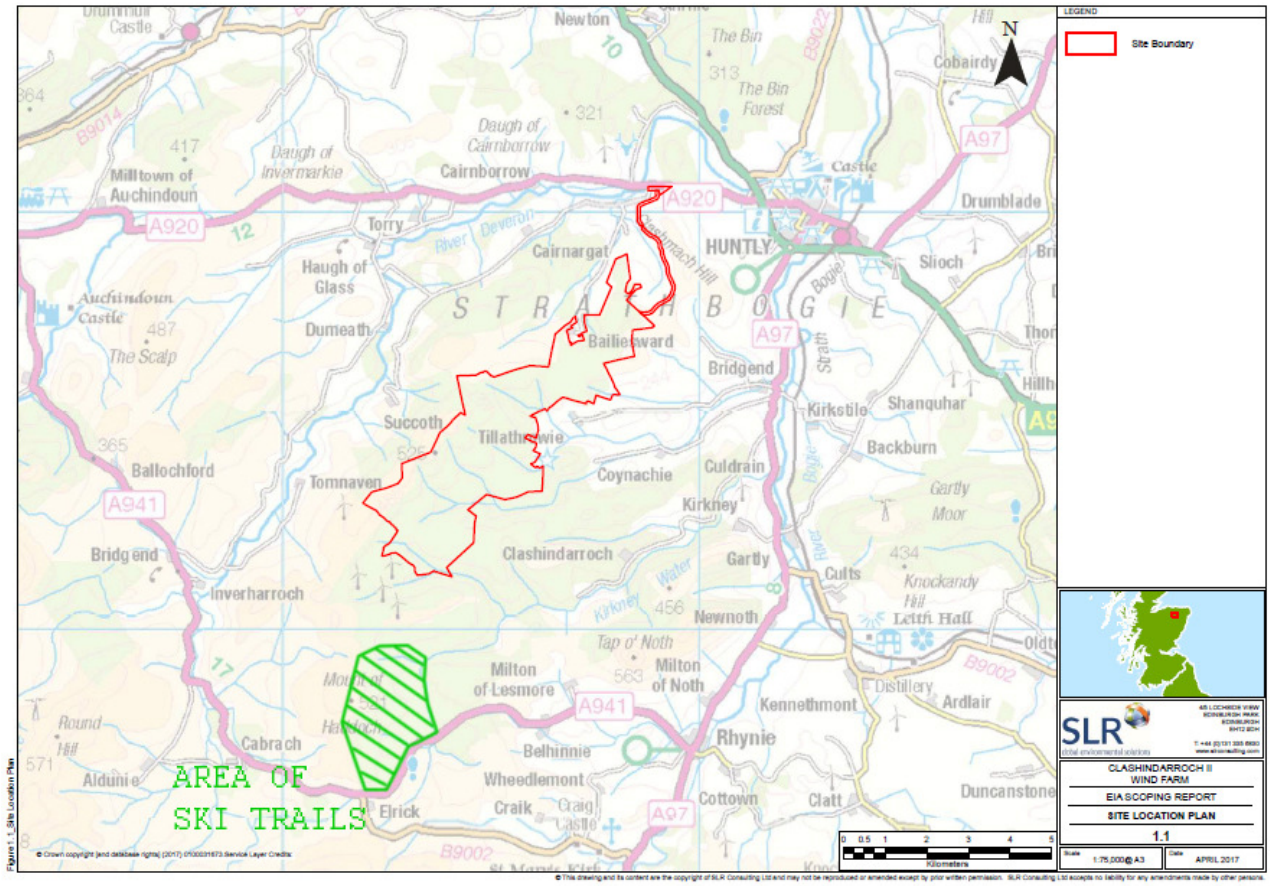
The Club gave evidence at the Public Inquiry in 2006 on the harmful impact of the original Clashindarroch Wind Farm development by AMEC. Modifications to this original plan, i.e. the removal of three of the turbines that were to be sited on the Ski Trails, meant that negative impact to skiing was reduced. Although the proposed extension is not sited directly on the Ski Trails (see accompanying map) we believe it would be helpful to outline briefly our concerns.

1. We would object to any clear felling of trees on or adjacent to the Ski Trails. The trees help collect the drifting snow then their shade protects the snow from thaw.
2. We would object to any operations that damaged the road surfaces or hindered skiing. Mention is made in the Scoping Report (3.1.4, p.5) that "borrow pits" may be used – could these be near the Ski Trails?
3. We would object to any restrictions to access onto the Ski Trails as a result of construction and/or operation of the wind farm.
4. Section 6 of the Scoping Report "Landscape and Visual" does not have a viewpoint from the vicinity of the Ski Trails (Table 6.1, Map 6.3). A viewpoint assessment from a higher part of the Ski Trails is justified.
5. It should be noted that Nordic skiers do not just confine their skiing to the Clashindarroch Ski Trails but ski throughout forest and on open moorland hills where there would be a visual impact.
6. Our final point does not directly concern the Ski Trails but is a more general point regarding access to the forest. Many members of the Club ski, walk, run and cycle throughout the entire Clashindarroch Forest. The British Nordic Development Squad host a well attended run/cycle fund raising event within the forest each summer. Although we recognise that some temporary access restrictions may be required during construction we would not expect to see any dilution of the current open access enjoyed by all forest users.

OTHER BODIES TO BE CONSULTED.

We would recommend you Snowsport Scotland who will be able to provide more general information on Nordic skiing in Scotland. They will be able confirm the Club's competence to comment on skiing in the area.

LOCATION OF THE SKI TRAILS WITH REFERENCE TO THE PROPOSED WIND FARM EXTENSION.



CONTACT DETAILS:

Peter Thorn,
Secretary, Huntly Nordic Ski Club,
West Craigton Cottage,
Kennethmont,
Huntly,
Aberdeenshire,
AB54 4QP.

Tel: 01464 831429
Email: huntlynordicsc@yahoo.co.uk

www.nordicski.co.uk
www.facebook.com/HuntlyNordic

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>
Sent: 25 April 2017 14:03
To: Melrose J (Joyce)
Subject: Clashindarroch II Wind Farm, Clashindarroch, Aberdeenshire [WF444774]

Dear joyce,

A Windfarms Team member has replied to your coordination request, reference **WF444774** with the following response:

Dear Sir/Madam,

***Planning Ref**: Section 36 - Scoping Opinion Request*

***Name/Location**: Clashindarroch II, Succoth, Huntly, Aberdeenshire*

***Site Centre/Turbine at NGR/IGR**: n/a*

Total 16 turbines at NGR:

T01 344877 834073
T02 345574 833363
T03 344038 833752
T04 343606 832158
T05 343217 832947
T06 345330 833712
T07 344370 832685
T08 344346 831993
T09 344693 833266
T10 343782 833020
T11 342732 832694
T12 344265 833468
T13 344015 832133
T14 343539 832549
T15 342965 832433
T16 343073 832018

***Development Radius**: n/a*

***Hub Height**: 100m **Rotor Radius**: 50m*

*This proposal **cleared** with respect to radio link infrastructure operated by:*

The Local Electricity Utility and Scotia Gas Networks

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However,if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently,developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

The Joint Radio Company Limited
Dean Bradley House,
52 Horseferry Road,
LONDON SW1P 2AF
United Kingdom

Office: 020 7706 5199

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.
Registered in England & Wales: 2990041
http://www.jrc.co.uk/about-us

We hope this response has sufficiently answered your query.
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

https://breeze.jrc.co.uk/tickets/view.php?auth=o1xr2bqaafleiaaaLMWbWEd5tOjsiQ%3D%3D

marinescotland

Scottish Government
Riaghaltas na h-Alba
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Ms Joyce Melrose
Local Energy and Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Our ref: FL/10-7
May 10th 2017

Dear Joyce,

CLASHINDARROCH II WIND FARM, HUNTLY, ABERDEENSHIRE

Thank you for seeking comment from Marine Scotland Science (MSS) on the scoping report for the proposed Clashindarroch II wind farm in Aberdeenshire.

The proposed development site lies within the catchments of the River Deveron and River Bogie. Both rivers support good populations of salmon and trout populations.

We welcome the intention of the developer to seek fisheries and water quality data as part of the desk study to inform the Environmental Statement (ES). Data collected as part of the operational Clashindarroch wind farm may be beneficial, however, we advise the developer to carry out site characterisation surveys of watercourses within and downstream of the proposed development area, should the desk study not provide sufficient up to date information on the presence and abundance of fish populations (in addition to fish habitat assessment surveys) and the water quality (hydrochemical parameters- including turbidity and flow/stream stage height data and macroinvertebrate composition) of watercourses potentially impacted from the proposed development. Such information allows the developer to fully assess the potential impacts of the proposed development, a requisite of the Environmental Impact Assessment (EIA), and to draw up appropriate site specific mitigation measures and monitoring programmes.

The scoping report states the specification of a water monitoring plan could be relevant. MSS encourages the developer to provide details, within the ES, regarding the proposed

monitoring plans-water quality – including hydrochemical and macroinvertebrate, and fish populations, further information on site characterisation data and monitoring plans before, during and after construction can be found at the following website http://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren.

We recommend the developer to consider the potential impacts of felling and the cumulative impact of the present proposal and adjacent wind farms (operational and proposed) on the water quality and fish populations within and downstream of the proposed development area.

Due consideration should be given to fish passage within the watercourses potentially impacted by the proposed development.

We also suggest a restoration and decommissioning plan, to include fisheries related issues, to be considered as part of the EIA process and discussed within the ES.

In summary, the proposed development is likely to have an impact on the salmonid populations within and downstream of the proposed development area. Site characterisation surveys to determine fish species and their abundance, water quality (hydrochemical parameters) and the macroinvertebrate composition will allow a full assessment of the potential impacts on watercourses within and downstream of the development site. Details regarding proposed site specific mitigation measures and monitoring programmes, to avoid and/or reduce the potential impacts of this development, should be outlined in the ES.

Kind regards,

Dr Emily E. Bridcut

From:	ALLEN, Sarah J <Sarah.ALLEN@nats.co.uk> on behalf of NATS Safeguarding <gmb-bdn-000913@nats.co.uk>
Sent:	28 April 2017 15:25
To:	Econsents Admin
Subject:	Proposed Windfarm: Clashindarroch II (Our Ref: SG21494)
Attachments:	21494_TOPA_v2.doc

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA **SG21494.**

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries please contact us using the details below.

Yours Faithfully

NATS Safeguarding

D: 01489 444687
E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Technical and Operational Assessment (TOPA)

For Clashindarroch 2

Windfarm Development

Issue 2

NATS reference: W(F)21494

Publication history

Issue	Month/Year	Changes in this issue
Issue 1	June 2015	Pre Planning Assessment
Issue 2	April 2017	Scottish Government Submission

Contents

1. Background

1.1. En-route Consultation

NATS is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of radars, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and assesses the potential impact of every proposed development in the UK.

The En-route radar technical assessment section of this document defines the assessments carried out against the development proposed in section 2.

2. Application details

The Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Clashindarroch II, Aberdeenshire as detailed in the table below.

Turbine	Lat	Long	East	North	Hub (m)	Tip (m)
1	57.3937	-2.9188	344877	834073	0	149.9
2	57.3874	-2.9070	345574	833363	0	149.9
3	57.3907	-2.9326	344038	833752	0	149.9
4	57.3764	-2.9395	343606	832158	0	149.9
5	57.3834	-2.9461	343217	832947	0	149.9
6	57.3905	-2.9111	345330	833712	0	149.9
7	57.3812	-2.9269	344370	832685	0	149.9
8	57.3750	-2.9271	344346	831993	0	149.9
9	57.3864	-2.9216	344693	833266	0	149.9
10	57.3841	-2.9367	343782	833020	0	149.9
11	57.3811	-2.9541	342732	832694	0	149.9
12	57.3882	-2.9288	344265	833468	0	149.9
13	57.3762	-2.9326	344015	832133	0	149.9
14	57.3799	-2.9407	343539	832549	0	149.9
15	57.3787	-2.9502	342965	832433	0	149.9
16	57.3750	-2.9483	343073	832018	0	149.9

Table 1 – turbine coordinates and height

3. Assessments Required

The proposed development falls within the assessment area of the following systems:

Radar	Lat	Long	nm	km	Az (deg)	Type
Alanshill Radar	57.6431	-2.1655	28.5	52.8	238.1	CMB
Perwinnes Radar	57.2123	-2.1309	27.4	50.7	291.8	CMB
Tiree Radar	56.4556	-6.9230	141.9	262.7	65.3	CMB
Nav	**Lat**	**Long**	**nm**	**km**	**Az (deg)**	**Type**
None						
AGA	**Lat**	**Long**	**nm**	**km**	**Az (deg)**	**Type**
None						

Table 2 – Impacted Infrastructure

3.1. En-route radar technical assessment

3.1.1. Predicted impact on Allanshill Radar

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the radar's probability of detection, for real aircraft, is also anticipated.

3.1.2. En-route operational assessment of radar impact

Where an assessment reveals a technical impact on a specific NATS radar, the users of that radar are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Aberdeen En Route ATC	Acceptable
Prestwick Centre ATC	**Unacceptable**
RDP Asset Management	**Unacceptable**
Prestwick Centre Military ATC	Acceptable

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected radar, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

3.2. En-route navigational aid assessment

3.2.1. Predicted impact on navigation aids.

No impact is anticipated on NATS's navigation aids.

3.3. En-route radio communication assessment

3.3.1. Predicted impact on the radio communications infrastructure.

No impact is anticipated on NATS's radio communications infrastructure.

4. Conclusions

4.1. En-route consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be **unacceptable**.

Appendix A – background radar theory

Primary Radar False Plots

When radar transmits a pulse of energy with a power of $\mathbf{P_t}$ the power density, **P**, at a range of **r** is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where $\boldsymbol{G_t}$ is the gain of the radar's antenna in the direction in question.

If an object at this point in space has a radar cross section of **σ**, this can be treated as if the object re-radiates the pulse with a gain of **σ** and therefore the power density of the reflected signal at the radar is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The radar's ability to collect this power and feed it to its receiver is a function of its antenna's effective area, $\mathbf{A_e}$, and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

*Where $\boldsymbol{G_t}$ is the Radar antenna's receive gain in the direction of the object and **λ** is the radar's wavelength.*

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the radar system as well as external losses due to terrain and atmospheric absorption.

*For simplicity these losses are generally combined in a single variable **L**.*

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

Secondary Radar Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where $\mathbf{r_t}$ and $\mathbf{r_r}$ are the range from radar-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

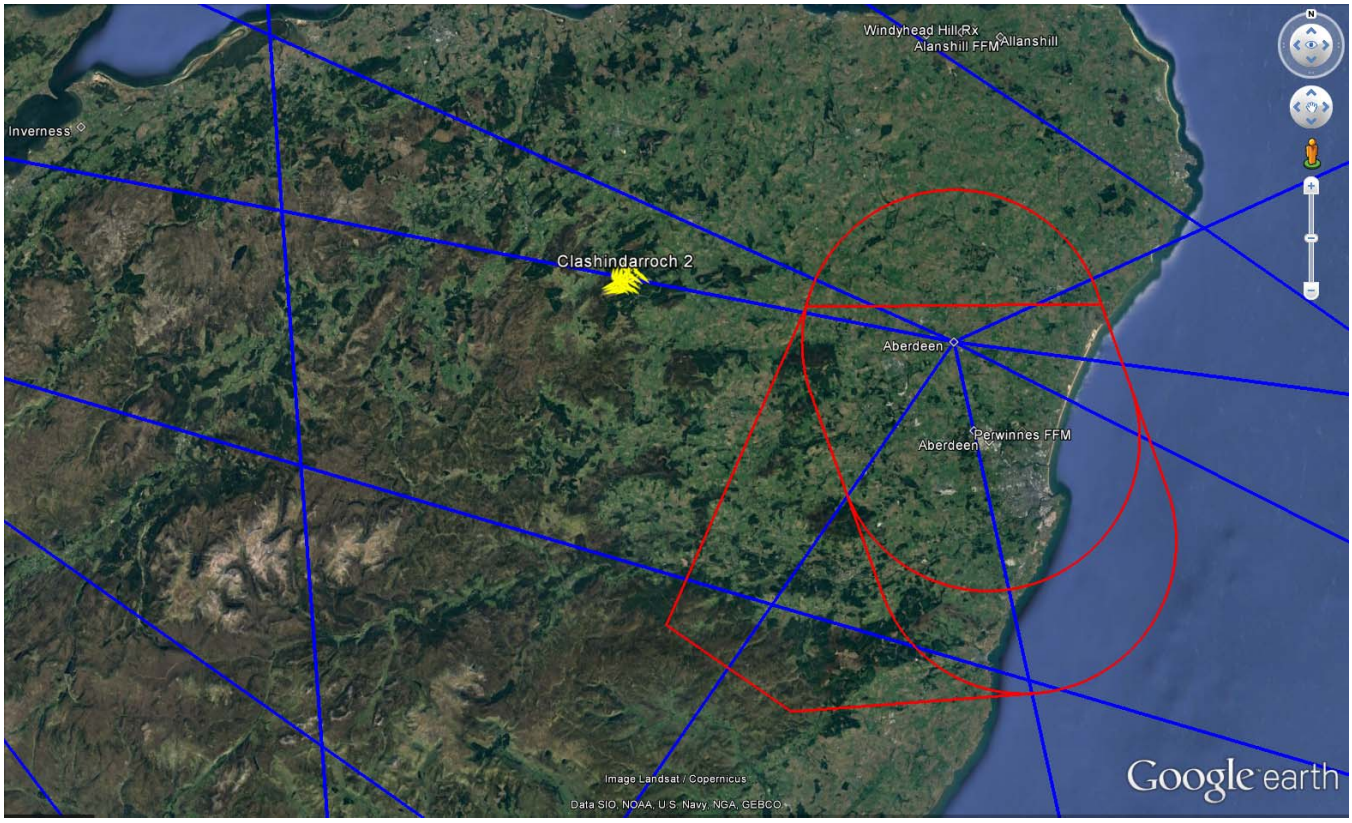
Shadowing

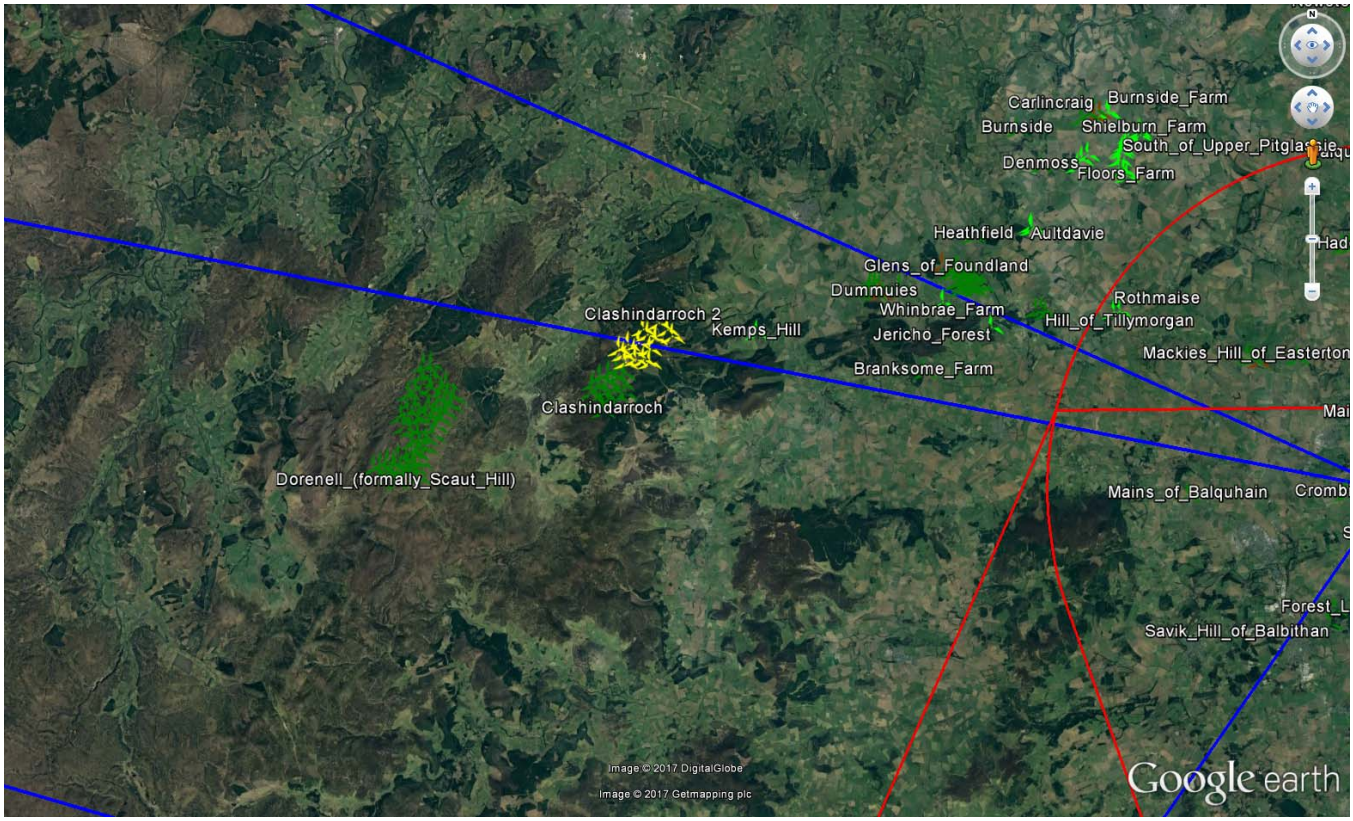
When turbines lie directly between a radar and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.
It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams





consented/built impact –accepted impact –objection mitigated

mitigation –proposed no impact refused/withdrawn

The River Deveron District Salmon Fishery Board

The Offices, The Stables, Avochie, Huntly, Aberdeenshire, AB54 7YY

24/04/17

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE CLASHINDARROCH II WIND FARM, CLASHINDARROCH, ABERDEENSHIRE

Dear Ms Melrose,

Thank you for the opportunity to comment on the scoping document for the development known as Clashindarroch II. The development is bordered by two main river systems: the river Bogie to the east and the river Deveron to the west. Construction of the proposed development could potentially have an impact on the biodiversity of the area, in particular the aquatic-biodiversity such as fish populations. The Bogie system is an extremely important tributary and a significant element of the river Deveron. Previous work by the DBIT has shown that the Bogie supports healthy numbers of Atlantic salmon (Salmo salar L.), trout (Salmo trutta L.) and the European eel (Anguilla anguilla L.).

The possible impacts that a wind farm and its associated infrastructure, can have on surrounding flora and fauna are well documented. Potential impacts on fish populations may occur during either the construction or operational phase. During construction, the potential impacts could include noise/vibration disturbance, siltation, and hydrological changes of the peat system, pollution and the blocking or hindering of upstream access of fish. During the operational phase, the main concerns are poor road drainage, accelerated levels of erosion and the poor maintenance of silt traps and road crossings.

With species such as salmon having such a complex life cycle these potential effects could all impact on various parts of its life, causing direct mortality of juveniles and adults, changes in invertebrate abundance, avoidance behaviour resulting in unused habitat, blocking of migration routes to/from spawning beds or the damage of in stream/riparian habitat.

We acknowledge that there will be baseline fisheries data collected by the Deveron, Bogie and Isla Rivers Charitable Trust considered as part of the scoping exercise, and that there will also be surveys completed to identify deep areas of peat, which will ultimately help avoid these areas. We however do not feel that the mitigation measures outlined in the document in terms of water quality and fish stocks and their habitats (both resident and migratory) are adequate and **we therefore submit a conditional objection**. We recommend that a formal Fisheries Management Plan is specified for the development and that we have full input during the formation of the plan to cover all concerns listed previously.

Sincerely,

Richard C Miller, BSc MIFM

Director

Tel: 01466 711 388 www.deveron.org office@deveron.org

giving nature a home

RSPB Scotland

Joyce Melrose
Admin Officer
Energy Consents Unit
The Scottish Government

09 May 2017

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE CLASHINDARROCH II WIND FARM, CLASHINDARROCH, ABERDEENSHIRE

Thank you for consulting RSPB Scotland on the consultation above. Please find our comments below.

- The ornithological survey areas seem to have been based on the indicative turbine 2015 layout, which has apparently now changed. Based on Fig 7.1. It seems that at least one of the proposed turbines is outside the 500m buffer area. This does not comply with SNH's 2014 guidance ("Recommended bird survey methods to inform impact assessment of onshore wind farms ") which states that the main breeding and wintering bird survey areas should extend at least 500m beyond the development/planning application boundary.

- The 2015 breeding raptor observations started late (May). Given Goshawk are the most numerous raptor, surveys should have been started earlier (March). The earlier start in 2016 indicates there was lots of spring Goshawk activity, which may have been missed in 2015.

- Two full years worth of raptor survey has not been completed (as per SNH guidance). Surveys covered one autumn and winter period, two summers and one full spring period. However, we accept the applicant's justification that "This level of survey effort is considered to be sufficient in the context of the key species of interest using the site and the amount of information from other sources that is available to reliably characterise the ornithological sensitivity of the site."

- The scoping report makes no mention of the possibility of attracting species such as hen harrier and other birds of prey, to within the site by creating open landscape habitat by felling trees. We would advise specific reference to the SNH 2016 guidance "Wind farm proposals on afforested sites – advice on reducing suitability for hen harrier, merlin and short-eared owl" (http://www.snh.gov.uk/docs/A1695844.pdf). This should be considered in the EIA.

East Scotland Regional Office
10 Albyn Terrace
Aberdeen
AB10 1YP

Tel 01224 624824
Fax 01767 685571

rspb.org.uk

- The protected mammals seem to be adequately covered. Consultation appears to have been carried out with the relevant bodies in relation to these species, especially wildcat. We would recommend further consultation with these groups in the development of any Habitat Management Plan that may be required to mitigate impacts on these mammals.

Yours sincerely,

[redacted]

Hywel Maggs
Senior Conservation Officer
hywel.maggs@rspb.org.uk

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19 April 2017

SCOTTISH WATER
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G33 6FB

0141 414 7444
www.scottishwater.co.uk
EIA@scottishwater.co.uk

Energy Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

By email to: Econsents_Admin@gov.scot

Dear Sir/Madam,

Clashindarroch II – EIA Scoping Opinion

Thank you for consulting with Scottish Water regarding the above proposed development.

Drinking Water Protected Areas

The proposed Clashindarroch II Wind Farm falls within drinking water catchments within which Scottish Water abstractions from Clashmach Spring, Clashmach Wellhead and Wellheads Farm, Collonach Valley Burn and the River Deveron at Cairnford and at Muiresk are located. Scottish Water abstractions are designated as DWPAs under Article 7 of the Water Framework Directive.

The above mentioned abstraction sources supply Craighead Water Treatment Works (WTW) and Turriff WTW. It is essential that water quality and water quantity in the area are protected. Annex 1 details a list of precautions and protection measures to be taken within a DWPA and the wider drinking water catchment.

At subsequent consultations, it would be helpful if the site map and turbine locations for Clashindarroch II could be provided to us in GIS shape file format, if possible.

Scottish Water Assets

A review of our records indicates that there are Scottish Water assets within the proposal site (including the access route). This includes two raw water mains in potential conflict with the site access route and a 6" asbestos cement main and 9" cast iron main. The location of Scottish Water assets should be confirmed through obtaining detailed plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in Annex 1.

All Scottish Water assets potentially affected by the development should be identified, with particular consideration being given to access roads and pipe crossings. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.

In the event that asset conflicts are identified then early contact should be made with the Scottish Water Asset Impact Team (AIT) at **service.relocation@scottishwater.co.uk**. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the AIT for review and written acceptance. Works should not take place on-site without prior written acceptance by Scottish Water.

In addition to the precautions and protection measures to be undertaken when works are to take place within a DWPA or drinking water catchment Annex 1 also includes a list of precautions to be taken when working within the vicinity of Scottish Water assets. This list of precautions is not exhaustive but should be taken into account as the development progresses through the planning and development process.

It should be noted that the development will be required to comply with Sewers for Scotland and Water for Scotland 3rd Editions 2015, including provision of appropriate clearance distances from Scottish Water assets.

If you have any questions relating to the above, or in relation to the information presented in Annex 1, please do not hesitate to contact me.

Yours faithfully

[redacted]

Rebecca Williams
Strategic Planner – Environmental Impact Assessment
EIA@scottishwater.co.uk

Annex 1: Precautions to protect drinking water and Scottish Water assets during windfarm construction and operational activities

General requirements

1. The proposed timing of the works, including planned start and completion dates, should be submitted to Scottish Water in advance of any activities taking place on-site. This information should be submitted to **EIA@scottishwater.co.uk**.

2. If a connection to the water or waste water network is required, a separate application must be made to the Scottish Water Development Operations Team for permission to connect. It is important to note that the granting of planning consent does not guarantee a connection to Scottish Water assets. The Development Operations Team can be contacted by telephone on **0800 389 0379** or via email at **developmentoperations@scottishwater.co.uk**.

3. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and the local contact if known.

Protecting drinking water quality

Regulatory requirements

4. Scottish Water is required to ensure that any activity within a drinking water catchment does not affect the ability of Scottish Water to meet its regulatory requirements.

5. Water Treatment Works are designed to treat the specific parameters of the raw water source they receive (i.e. the specific chemical, biological and other characteristics of natural, untreated water). If the characteristics of the raw water change or deteriorate, it can affect the ability of the works to supply drinking water to customers at the required standards.

6. The regulations relating to the quality of drinking water supplied by Scottish Water are the Water Supply (Water Quality) (Scotland) Regulations 2001. Quality Standards are derived from the European Drinking Water Directive 98/83/EC.

7. Drinking water catchments feed Scottish Water abstractions which supply water to water treatment works. Under Article 7 of the Water Framework Directive, waters used for the abstraction of drinking water are designated as Drinking Water Protected Areas (DWPA). The objective of the Water Framework Directive is to ensure that no activity results in the deterioration of waters within the DWPA. If an activity falls within a DWPA or drinking water catchment, it is essential that water quality and quantity are protected.

Specific precautions for drinking water protection during windfarm activities

8. A detailed, site specific Construction Method Statement including e.g. Construction Environmental Management Plan, Risk Assessment, Pollution Prevention and Contingency Plan must be submitted to Scottish Water at least three months prior to the works commencing. This should be agreed with Scottish Water prior to any operations taking place. Any other associated documents (e.g. Drainage Plan, Peat Management Plan etc.) should also be submitted and agreed with Scottish Water at least three months prior to works commencing. In the first instance, this information should be supplied to **EIA@scottishwater.co.uk**.

9. Where possible, infrastructure and activities should be located outside of the drinking water catchment. If this can be demonstrated to be impracticable then all infrastructure and activities should be located 100m from any watercourse where possible, and a minimum of 50m distant where 100m can be demonstrated to be undeliverable. This includes turbine locations, crane hard standing areas, cable trenches, access tracks and temporary construction related activities such as borrow pits, plant stockpiled materials, cement batching, wheel washing and construction compound areas.

10. Any potential effect on the hydrology of the area resulting from the construction and operation of the proposed development should be assessed and the findings presented in the Environmental Statement or environmental appraisal accompanying the planning application. This should include consideration of natural drainage patterns, base flows/volume, retention/run-off rates and potential changes to water quantity. Any required mitigation measures and proposed monitoring should also be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

11. When constructing roads, drainage ditches and trenches, drainage should not be directed into adjacent catchments but retained within the existing catchment.

12. Any potential pollution risk which could affect water quality should be considered and mitigation measures implemented to prevent deterioration in water quality and pollution incidents. This includes sediment run-off, soil or peat erosion, management of chemicals and oils, etc. (see also point 17 below). This should be considered for operations at all stages of development including pre- and post-construction.

13. Mitigation measures to prevent pollution to watercourses should be outlined in the Environmental Statement or environmental appraisal accompanying the planning application, and adopted in the Construction Method Statement/Construction Environmental Management Plan prior to work starting on-site. Any measures implemented should be regularly checked, maintained and improved if pollution occurs.

14. Consideration should be given to the use of food grade oils within turbines in close proximity to watercourses. The use of food grade oils within other plant and vehicles should also be considered depending on the risk to the drinking water catchment.

15. Watercourses that feed into any watercourses or reservoirs that Scottish Water abstracts from should be considered when developing new road or access infrastructure. Any crossing of these watercourses should be kept to a minimum. Pollution prevention measures should be put in place at each crossing point and silt traps, or equivalent, should be installed at regular intervals to minimise the risk from pollution.

16. Once constructed, site roads and access routes should be regularly maintained to ensure minimal erosion, and hence run-off and pollution, from the road surface. Site roads should be constructed from inert, non-metalliferrous material, with low erodibility and low sulphide content.

17. No refuelling or storage of fuel or hazardous materials should take place within the drinking water catchment area. If this can be demonstrated to be impracticable, then the appropriate Scottish Environment Protection Agency (SEPA) Pollution Prevention Guidelines (PPG) should be followed (PPG 2: Above ground oil storage, PPG 6: Working at construction and demolition sites, PPG 8: Safe storage and disposal of fuel oils, PPG 21: Pollution incident response planning and PPG 22: Incident response – dealing with spills). 50m buffers should be applied to all surface watercourses, groundwater borehole abstraction points and springs. Oil storage should be in accordance with The Water Environment (Oil Storage) Regulations (Scotland) 2006. There should be dedicated oil storage areas created. Spill kits should be located within all vehicles, plant and high risk areas.

18. Waste storage, concrete preparation and all washout areas should not be within the drinking water catchment area. If this can be demonstrated to be impracticable then this should be in dedicated areas 50m from a watercourse and designed to be contained and to prevent escape of materials/run-off to the environment.

19. Welfare/waste water facilities should preferably be located outside the drinking water catchment. If not practicable, then portable toilets should be used and waste disposed of off-site. Alternatively secondary treatment and soakaways should be used and, if required, a sampling chamber installed and sampling programme agreed. The proposed method of managing welfare and waste water facilities should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application. If sampling is required, Scottish Water should be contacted via **EIA@scottishwater.co.uk** in the first instance.

20. Any proposed abstractions for activities such as welfare facilities or cement batching plants should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

21. Induction training should be given to all personnel on-site and should include Scottish Water site sensitivities in relation to drinking water catchments and assets (see below), as well as spill response as outlined in PPG 22: Dealing with spills.

22. Construction and Environmental Management Plans, Pollution Prevention and Contingency Plan and associated documents should include the Scottish Water Customer Helpline Number **0800 0778 778** and the local contact details.

Protecting drinking water in peatland areas

23. When peat is present within the proposed area of activity the Environmental Statement or environmental appraisal accompanying the planning application should include an assessment on the potential release of colour, dissolved organic carbon and total organic carbon as a result of changes to hydrology and/or physical disturbance. This should cover the construction and post-construction phases.

24. Excavations and ground disturbance in areas of deep peat should be avoided. Deep peat is considered to be peat greater than 0.5m deep as stated in Good Practice During Windfarm Construction, 2015 (joint publication by Scottish Renewables, Scottish Natural Heritage, SEPA, Forestry Commission Scotland and Historic Environment Scotland).

25. The natural hydrology within peat should be maintained and/or restored. This should be taken into account when designing the turbine foundations, crane hardstanding areas, access tracks and cable trenches, etc. Any necessary measures to maintain natural drainage of peat and sub-surface hydrology, such as tailored drain spacing on access tracks, should be implemented as part of the design of the development.

26. Scottish Water requests that, where possible, access tracks in the drinking water catchment are constructed as floating tracks with adequate provision for maintaining existing drainage patterns.

27. Exposed soils and peat can release sediment, colour and dissolved organic carbon. The use of geotextiles, turf replacement and/or reseeding, should be undertaken as soon as possible.

28. Restoration of any degraded peat should be considered for areas within the drinking water catchment.

Protecting drinking water due to forestry activity

29. An assessment of any forestry activity, including felling, planting or other activity, likely to affect the drinking water catchment should be included in the Environmental Statement or environmental appraisal accompanying the planning application. Any specific mitigation measures should be identified and incorporated into the Construction Environmental Management Plan for the site prior to works commencing.

30. The Environmental Statement or environmental appraisal accompanying the planning application should include details on the harvesting/clearance process for any felling/woodland removal. The least disturbing method/s should be selected where possible.

31. Any historic drains or ditches within the windfarm area that discharge directly to a watercourse in the drinking water catchment should be blocked and slowly discharged to a buffer area in line with current Forestry Commission Forest and Water Guidelines. Where possible, this should be undertaken in advance of any work being carried out on-site, to provide protection for watercourses during site activities.

Monitoring requirements to protect drinking water quality

32. During construction, a programme of daily visual inspection of the watercourses, flow conditions (i.e. high, medium, low, or no flow), prevailing weather and any other pertinent observations, will be required to be implemented. The results should be recorded and the information submitted to Scottish Water (i.e. in a monthly progress report). This should be undertaken when water quality samples are taken. In the first instance, reporting should be provided to **EIA@scottishwater.co.uk**.

33. A water sampling programme shall be established and agreed with Scottish Water. This should assess the baseline water quality for a minimum of one year prior to any activities commencing on-site where possible, including ground investigations and any felling activities, to allow an accurate understanding of baseline conditions at the site. Water sampling should continue during construction and then post-construction for a minimum of one year. Following completion of one year of sampling post-construction, this should be reviewed to determine whether this should continue for a further agreed period. The parameters, frequency and sampling locations will also need to be agreed with Scottish Water. This monitoring will establish if any decline in water quality can be attributed to the development. It may also be necessary to establish trigger levels to determine when any potential issues should be reported to Scottish Water.

34. The appointed Ecological or Environmental Clerk of Works should be accredited with the Association of Environmental and Ecological Clerk of Works (AEECoW) and should have relevant knowledge and experience to provide advice and monitor compliance with measures for the protection of water quality in relation to abstractions for water supply.

35. Depending on the vulnerability of the public water supply, Scottish Water may request that a dedicated Environmental Manager be appointed and present on-site to assess and monitor any effects caused by the development.

Guidance documents

36. Please ensure that appropriate Guidance Documents are followed, including:

- Good Practice during Wind Farm Construction, Version 3. SNH/SEPA/Scottish Renewables/Forestry Commission Scotland (September 2015).
- Floating Roads on Peat. Forestry Civil Engineering and SNH. (August 2010).
- Constructed tracks in the Scottish Uplands, 2nd edition. SNH (June 2013).
- Forests and water UK Forestry Standard Guidelines, 5th Edition. Forestry Commission (2011).
- General Binding Rules under the Controlled Activities Regulations (see The Water Environment (Controlled Activities) Scotland Regulations (as amended) A Practical Guide, Version 7.2, SEPA (March 2015)).
- SEPA Pollution Prevention Guidelines (http://www.sepa.org.uk/regulations/water/guidance/).

Protecting Scottish Water assets

37. If an activity associated with a development proposal is located within close proximity to Scottish Water assets, including water and waste water pipe infrastructure, treatment works and reservoirs etc., it is essential that these assets are protected from damage. To this end, the developer will be required to comply with Scottish Water's current process, guidance, standards and policies in relation to such matters.

38. Copies of Scottish Water's relevant record drawings can be obtained from the undernoted Asset Plan Providers. This is distinct from the right to seek access to and inspect apparatus plans at Scottish Waters area offices, for which no charge is applied.

Site Investigation Services (UK) Ltd
Tel: 0333 123 1223
Email: sw@sisplan.co.uk
www.sisplan.co.uk

National One-Call
Tel: 0844 800 9957
Email: swplans@national-one-call.co.uk
www.national-one-call.co.uk/swplans

39. It should be noted that the site plans obtained via the Asset Plan providers are indicative and their accuracy cannot be relied upon. It is therefore recommended that the developer contacts the **Scottish Water Asset Impact Team** at **service.relocation@scottishwater.co.uk** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Scottish Water will not be liable for any loss, damage or costs caused by relying upon plans or from carrying out any such site investigation.

40. Prior to any activity commencing, all known Scottish Water assets should be identified, located and marked-out.

41. Scottish Water expects method statements, safe systems of work and risk assessments to be prepared and submitted in advance to Scottish Water for formal review and acceptance. These documents shall consider and outline in detail how existing Scottish Water assets are to be protected and/or managed for the duration of any construction works and during operation of the development if relevant. These documents must be submitted to Scottish Water's Asset Impact team for formal prior written acceptance.

42. The developer shall obtain written acceptance from Scottish Water's Asset Impact Team where any site activities are intended to take place in the vicinity of Scottish Water's assets. The Asset Impact Team can advise on any potential risk mitigation measures that may be required.

43. Scottish Water and its representatives shall be allowed access to Scottish Water assets at all times for inspection, maintenance and repair. This will also ensure that the Scottish Water assets are protected and that any Scottish Water requirements are being observed.

44. Any obstruction or hindrance of access to Scottish Water assets should be avoided. The prompt and efficient use and manipulation of valves, hydrants, meters or other apparatus is required at all times. There should also be no interference with the free discharge from water main scours or sewer overflows.

45. In the event of an incident occurring that could affect Scottish Water, including any damage to assets, Scottish Water should be notified without delay, using the Customer Helpline number **0800 0778 778**, and the local contact if known. Scottish Water apparatus should not be interfered with or operated by anyone other than Scottish Water personnel.

46. The 'offset distance' is the distance between any Scottish Water asset and adjacent properties and structures. Scottish Water reserves the right to ask for an offset distance in accordance with its own current policy and standards and to suit specific circumstances. The details of this requirement should be confirmed with Scottish Water as an early part of the design process.

47. Stationary plant, equipment, scaffolding, construction or excavated material, etc. should not be placed over, or close to, any Scottish Water assets without the prior written consent of Scottish Water which may be withheld depending on circumstances on-site.

48. Special care should be taken to avoid the burying of Scottish Water assets or the obstruction of sewers or manholes with fill or other material. Arrangements for altering the level of any chambers should be agreed in advance with Scottish Water and these should be constructed in accordance with Scottish Water requirements. The cost of any work to Scottish Water assets will be met by the project developer.

49. Excavation works (e.g. of wind turbine foundations) should not be carried out in the proximity of a water or waste water main without due notice having been given to Scottish Water and prior written acceptance obtained. The developer will comply fully with any Scottish Water specific site requirements.

50. Any tree planting associated with the development (e.g. compensatory planting or screening etc.) should be undertaken in line with Water for Scotland 3rd Edition (April 2015) to ensure that Scottish Water assets are not put at risk by future growth of tree roots.

51. Vibration in close proximity to Scottish Water pipelines or ancillary apparatus should be managed in accordance with British Standard 5228-1:2009 (Code of practice for noise and vibration control on construction and open sites). The predicted levels of vibration should be agreed in advance with Scottish Water as part of the risk assessment and method statement and agreed vibration monitoring arrangements will be required.

52. The developer will consider the possibility of increased loading on Scottish Water apparatus and measures will be taken to eliminate or mitigate increased loading on assets. Care should be taken to identify any assets which may be crossed by vehicles on the access route to the site and crossing points will be engineered to the requirements of Scottish Water. Any pipe crossing proposals are subject to prior written acceptance by Scottish Water.

53. Scottish Water will not accept liability for any costs incurred in fulfilling any of the above requirements during the development planning, construction or operational phases, either by the developer, the developer's associates, contractors or any other person or organisation involved in the project.

54. If the developer damages any Scottish Water asset they will be held liable for any costs resulting from this.

55. Scottish Water may require costs associated with the development to be reimbursed by the developer or the developer's agents.

ScotWays ®

Safeguarding public access in Scotland since 1845

econsentsadmin@gov.scot

Joyce Melrose
Admin Officer
Energy Consents Unit
The Scottish Government

02/06/2017

Dear Ms Melrose,

Re:
Electricity Act 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000
Scoping Opinion Request for proposed Section 36 Application for the
Clashindarroch II Wind Farm, Clashindarroch, Aberdeenshire

Thank you for your email of 19th April 2017 requesting comments on the above. Further to our subsequent correspondence with your colleague Lesley Tosun, we gratefully acknowledge the additional time allowed for our response.

The National Catalogue of Rights of Way shows right of way GG1 is affected by the area within the site boundary shown on Figure 3.1 *Indicative Turbine Location*. A map is enclosed showing right of way GG1 highlighted in orange. As there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded as they have not yet come to our notice.

You will no doubt be aware that there may now be general access rights over any area of land under the terms of the Land Reform (Scotland) Act 2003. If the applicant has not already done so, we suggest they consult the Core Path Plans, prepared by access authorities as part of their duties under this Act.

Our records indicate that the area within the site boundary is well-used for various types of recreational access; as such, representatives of walkers, runners, mountain bikers, horse-riders, skiers etc. will all need to be consulted. The local authority access teams may also be able to provide advice.

Figure 3.1 *Indicative Turbine Layout* provides no information regarding the track layout associated with the turbines and their connection to the public road network. Although I understand that there is very little guidance regarding the siting of turbines in relation to established paths and rights of way, I would like to draw your attention to the following:

Extract from the Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8)

Proximity to Highways and Railways

2.25 It is advisable to set back all wind turbines a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.

The Society will be interested to receive further detail regarding the proposed location of turbines, their associated tracks, the site's own access requirements and any access management plan in due course.

If a map showing rights of way and other recreational routes over an area wider than the site itself would aid production of the Landscape and Visual Impact Assessment, the applicant is welcome to contact the Society directly.

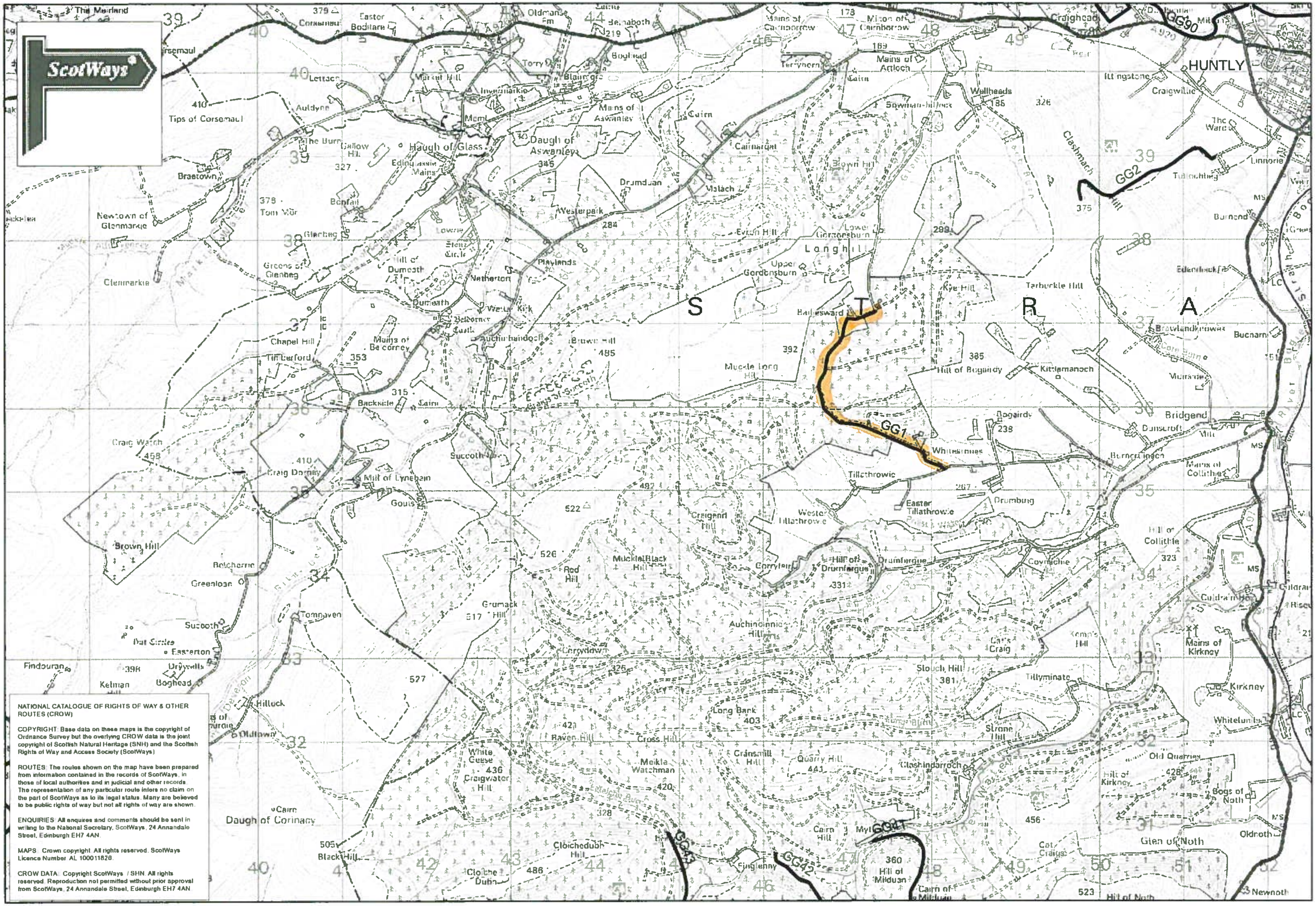
I hope the information provided is useful to you. Please do not hesitate to contact us if you need more detail or if you have any queries.

Yours sincerely,

Eleisha Fahy
Senior Access Officer

Cc: Alison Sidgwick, SLR Consulting Limited

The Scottish Rights of Way and Access Society, 24 Annandale Street, Edinburgh EH7 4AN (Registered Office)
Tel: 0131 558 1222 e-mail: info@scotways.com web: www.scotways.com



Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Our ref: PCS/152481
Your ref: 405.03640.00011

If telephoning ask for:
Alison Wilson

19 April 2017

Lesley Tosun
Scottish Government
4th Floor
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

By email only to: lesley.tosun@gov.scot

Dear Ms Tosun

Clashindarroch II Wind Farm
Environmental Impact Assessment Scoping Report

Further to our comments of 24 February 2017 (our reference PCS/151339) on a draft scoping report, we can confirm receipt of a copy of the Scoping Report for the above development, dated April 2017, by way of an email of 5 April 2017 from SLR. Please note our advice on this below.

Advice to the determining authority and applicant

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection,** the information outlined below and in the attached appendix must be submitted in support of the application.

a) Map and assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications.

b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.

c) Map and assessment of impacts upon groundwater abstractions and buffers.

d) Peat depth survey and table detailing re-use proposals.

e) Map and table detailing forest removal.

f) Map and site layout of borrow pits.

g) Schedule of mitigation including pollution prevention measures.

h) Borrow Pit Site Management Plan of pollution prevention measures.

i) Map of proposed waste water drainage layout.

j) Map of proposed surface water drainage layout.

k) Map of proposed water abstractions including details of the proposed operating regime.

l) Decommissioning statement.

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment.

1. Site specific comments

1.1 Within the Ecology chapter of the report we note that the 2015-16 surveys included all of the currently proposed wind turbine positions and the recommended buffer zones with the exceptions of wind turbines 2 and 3 which are within 250m of the NVC survey area boundary. As such we welcome the commitment that "Vattenfall will ensure that there is sufficient baseline data in place, including the recommended buffer zones, to inform the assessment."

1.2 In regard to the following ecology questions in your consultation letter-

- Confirmation of the approach to the ecological assessment is requested.
- Do consultees agree that the range of surveys carried out to date is sufficient and appropriate?

we advise the following:

- Section 8 of the scoping report references the existing surveys that have been undertaken. As the Phase 1 and NVC surveys undertaken are the standard ones the range of surveys carried out is sufficient and appropriate subject to the further assessment referenced in regard to turbines 2 and 3.
- There will be a need to assess whether the NVC community is a GWDTE.
- We welcome the potential sources of impact in regard to GWDTE identified in Section 8.1.3.

1.3 In regard to the following Soils, Geology and Water Environment questions in your consultation letter-

- Are the survey methods for assessing likely effects on hydrology, hydrogeology, geology and peat considered to be suitable?
- Confirmation that the decommissioning stage of the wind farm life cycle as referenced in Section 9.2.3 can be scoped out of the assessment.

we advise the following:

- we welcome that the "following technical reports will be prepared as technical appendices to the soils, geology and water environment chapter:
  - Schedule of watercourse crossings.
  - Peat slide risk assessment and management plan and
  - Borrow bit appraisal.

  and the mitigation measures detailed in this section.

1.4 We welcome that a peat probing survey will be undertaken and a National Vegetation Classification (NVC) survey for the site will be used to screen for the potential presence of GWDTEs. Further information on our requirements in regard to these and the form in which they must be submitted can be found in the attached appendix.

1.5 We note from section 9.2.3 of the report that "It is proposed that the decommissioning stage of wind farm life cycle is scoped out of the EIA." As per section 9 of Appendix 1 we would request that the general principles for decommissioning are provided in the Environmental Statement.

1.6 We note that page 30 of the report states "Given the location and geographical context of the site, it is considered that a basic Flood Risk Assessment (FRA) will need to be prepared to satisfy Scottish Planning Policy. This will be incorporated into the text, of the impact assessment, and is likely to include recommendations for the control and management of runoff from parts of the proposed built development."

1.7 The watercourses within the site boundary drain into the River Deveron and River Bogie catchments that both flow through Huntly. We hold records of flooding in both catchments, and in Huntly – most recently in January 2016. Therefore we welcome that an FRA will be prepared ensuring that flood risk downstream is not increased as a result of the development. Please see section 2 of Appendix 1 below for further advice.

1.8 We note from section 9.1.1 that "It is understood that the River Deveron is also used as a public water source for Huntly. Many of the isolated properties locally are known to be sustained by private water supplies." The River Deveron is categorised as a Drinking Water Protected River and the site boundary borders a Drinking Water Protected Catchment. These designations must be considered when designing a surface water drainage system for the construction phases of the site and full life of the proposal.

Regulatory advice for the applicant

2. Regulatory requirements

2.1 Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

2.2 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulations team in your local SEPA office at: 28 Perimeter Road, Pinefield, Elgin, IV30 6AF, Tel: 01343 547663.

If you have any queries relating to this letter, please contact me by telephone on 01224 266656 or email at planning.aberdeen@sepa.org.uk.

Yours sincerely

Alison Wilson

Senior Planning Officer
Planning Service

Ecopy to Alison Sidgwick, SLR, asidgwick@slrconsulting.com

Disclaimer
This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages.

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.
If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

1. Site layout

1.1 All maps must be based on the Ordnance Survey 1: 10 000 scale or greater base mapping to provide an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges.

2. Engineering activities in the water environment

2.1 We welcome that a schedule of watercourse crossings will be provided. 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 the water environment cannot be avoided then the submission must include a map showing:

a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.

b) A minimum buffer of 50 m 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, 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.

2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

2.3 Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.

2.4 Refer to Appendix 2 of our Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is

thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a Flood Risk Assessment.

3. Disturbance and re-use of excavated peat and other carbon rich soils

3.1 As highlighted in Section 9.1.1 of the report previous investigations indicate that there are deposits of peat within the site boundary. Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO_2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO_2 to the atmosphere. Developments must aim to minimise this release."

3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO_2 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.

3.3 The submission must include:

a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Developments on peatland: Site surveys and best practice), which includes advice on appropriate survey distances, with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.

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.

3.4 To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Regulatory Position Statement – Developments on Peat.

3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, 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.

3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

a) 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.

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 GWDTE affected.

4.2 Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.

5. Existing groundwater abstractions

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

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.

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.

5.2 Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information we require to be submitted.

6. Forest removal and forest waste

6.1 We note that “the development area includes part of Clashindarroch Forest”. Where forestry is present on the site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.

6.2 The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.

7. Borrow pits

7.1 We note that “Material for the construction of on-site tracks would, where possible, be derived from borrow pits within the site should the materials found be suitable.” 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.

7.2 The following information should also be submitted:

a) A map showing the location, size, depths and dimensions of each borrow pit.

b) A map showing in relation to each proposed excavation, stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres from working areas.

c) A site-specific buffer drawn around each loch or watercourse proportionate to the depth of excavations and at least 10 m from access tracks. 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, drawings of what is proposed in terms of engineering works.

d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.

e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.

f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.

g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.

h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Developments on peatland: Site surveys and best practice) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO_2.

i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.

j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

8. Pollution prevention and environmental management

8.1 One of our key interests in relation to developments is pollution prevention measures

during the periods of construction, operation, maintenance, demolition and restoration.

8.2 A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques, regulatory requirements, the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the Pollution prevention guidelines.

9. Decommissioning / Repowering

9.1 Proposals to discard materials that are likely to be classed as waste would be unacceptable under current waste management licensing and under waste management licensing at time of decommissioning if a similar regulatory framework exists at that time. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste. The layout and the general principles for decommissioning must demonstrate waste minimisation and compliance with the above waste regulatory position.

Scottish Natural Heritage
Dualchas Nàdair na h-Alba
All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Lesley Tosun
Senior Case Officer
Energy Consents Unit
Scottish Government
Glasgow G2 8LU
[By email] econsentsadmin@gov.scot

10 May 2017

Our ref: CEA145555

Dear Lesley

Clashindarroch II Wind Farm –Scoping Report

Thank you for your request for our advice on the scoping report for this proposal. We provided advice on a draft scoping report on 22 February 2017 and have reviewed the new report for changes from the earlier version. For future reference, it would be helpful if applicants include a page setting out the differences between the versions.

The comments below include and update those from our letter of 22 February.

1. Natural heritage advice

Our advice is that development in this area raises the following main issues. Careful consideration of these issues will be required during the design iteration process as part of the Environmental Impact Assessment (EIA):

We refer the developer to our published 'General scoping and pre-application advice' document to help inform the work carried out for their ES. This document can be found via the second paragraph of http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/general-advice-and-information/. As well as the natural heritage matters above, it provides advice on other impacts on the natural heritage that the developer will need to consider during the EIA process. **It includes a checklist of SNH requirements for what to include in an Environmental Statement, a copy of which is provided in Annex 1 to this letter.** Please note that this general advice document will be updated over time to reflect any changes to available information and SNH guidance, so users should ensure they refer to the most up to date version before use.

1.1 Designated Sites

The proposed development site is within the foraging range of common gull from the Tips of Corsemaul and Tom Mor Special Protection Area (SPA). Consequently we advise that there is connectivity with this SPA and the legislative requirements for European sites as detailed in http://www.snh.gov.uk/docs/A423286.pdf applies. We note that the developer will provide with the ES a study of the impacts of the proposed wind farm, to inform the appropriate assessment.

From the available information we agree with the scoping report that the habitat features of the following designated sites within 10km of the proposal site are unlikely to be affected and

can be scoped out of the EIA: the Hill of Towanreef Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), the River Spey SAC and the Moss of Kirkhill SSSI.

Should the proposal change significantly, we would expect the applicant to review the list of sites and assess any additional sites affected as part of the EIA process.

The Craigs of Succoth SSSI appears to be immediately adjacent to the development site boundary and further consideration of the impacts on this site, both direct and indirect, may be required, depending on what is proposed.

Full details of protected areas, including their conservation objectives/management statements, can be found in Sitelink via SNHi on our website http://www.snh.org.uk/snhi/. The developer should assess the direct and indirect impacts on these protected areas and their qualifying interests/notified features in the context of their conservation objectives/management statements. The assessment should be for the proposal on its own and cumulatively with other plans or projects also affecting the protected area.

1.2 Landscape and visual impacts, including cumulative

Wind farm design will be important. A key consideration will be how this wind farm relates to the existing wind farm at Clashindarroch which has smaller turbines.

Impacts on the Cairngorms National Park should be considered and we note that the Cairngorms National Park Authority have provided advice.

With regard to the evaluation criteria (6.2) we advise that moderate effects could also be deemed to be significant where they can be adequately supported by professional judgement.

We note that the view point list has been updated since the draft scoping report, following a site visit. (6.2.5). We have been consulted separately by Vattenfall's consultants, SLR Consulting on the view points to be used and on the approach to the cumulative impact assessment and will reply to them in due course. We will advise then whether the proposed cumulative assessment radius of 40km is sufficient or whether it should be 60km as usually recommended (6.2.2 and 6.2.7).

Our website provides guidance on landscape and visual impacts which should be referred to. The following documents were updated in February this year:

Siting and Design Guidance for Wind Farms (2017)
http://www.snh.gov.uk/docs/A2213231.pdf

Visual Representation of Wind Farms (2017) Compliance with these national visualisation standards will be required
http://www.snh.gov.uk/planning-and-development/renewable-energy/visual-representation/).

1.3 Wildcat

We are aware that the applicant contacted the Scottish Wildcat Project Officer for information on the presence and distribution of wildcat in the development site. The Project Officer has new information, therefore we recommend that the applicant contact her again to discuss this and also make available findings from their own surveys. The Project Officer also has information on presence of other species, caught through their camera trapping.

We also encourage the applicant to liaise with the Project Officer when preparing the ES and developing mitigation recommendations for wildcat.

1.4 Peat

The Carbon and Peatland Map 2016 is published on our website and gives a broad level indication of areas of peat: http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/.

The peat survey proposed in the scoping report should follow the process described in the Scottish Government's guidance. Probes may be needed more frequently than the intervals stated in the scoping report.

2. Concluding remarks

While we are supportive of the principle of renewable energy, our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is submitted as a formal application.

Please contact me should you have any queries about this letter.

Yours sincerely

Sue Lawrence
Tayside and Grampian Operations Officer
Sue.lawrence@snh.gov.uk

Annex 1 – pre-submission Environmental Statement / environmental report checklist

Checklist of SNH requirements for what to include in an Environmental Statement (or environmental report accompanying a planning application) - you should also refer to the published SNH guidance referred to in section 2.a of the general advice document, as well as any development specific pre-application advice provided by SNH.		***Included? (or record of agreement with SNH for non-inclusion)***
SNH scoping and pre-application advice	1. Demonstrate that you have taken account of specific SNH scoping and other pre-application advice. It is useful to provide a table summarising the key points raised at scoping/during pre-application, alongside how you have addressed them.	
Figures – general advice *("figures" includes maps, figures, photographs and other visualisations)*	2. All figures should be clear and of good quality, of an appropriate scale, with distinct legends and scale bar (where appropriate).	
	3. Unless otherwise agreed in writing with SNH, the ZTVs and figures used in support of the landscape and visual impact assessment should follow the national standards set out in *Visual Representation of Wind Farms (December 2014)* guidance http://www.snh.gov.uk/planning-and-development/renewable-energy/visual-representation/.	
	4. All ecological figures should show the application boundary, proposed turbines, tracks and other infrastructure locations, as well as the relevant ecological information/survey results.	
Collecting and presenting information – general advice	5. We recommend that the ecological chapters are split into topics, eg protected areas, species (birds, bats, otter, etc), habitats (terrestrial, freshwater), etc. Information and assessment of which activities associated with the construction, operation and decommissioning of the development are likely to have direct and indirect (including cumulative) significant environmental effects on the relevant natural heritage receptors, along with clear details of any mitigation, should be presented.	
	6. A table of issues/interests initially considered but then scoped out of further assessment should be provided in an annex, along with a short justification for each issue/interest.	
	7. A schedule of environmental mitigation should be provided in an annex for developments with impacts on multiple natural heritage interests. The schedule should compile all the environmental mitigation/enhancement measures into one list/table, for ease of reference.	

	8. Sensitive species information should be presented in a confidential annex with restricted circulation. Advice on how to deal with sensitive information can be found via http://www.snh.gov.uk/docs/A285693.pdf.	
	9. In addition to the specific requirements detailed in the sections below, full survey details including raw data, workings for calculations and results should be presented in the ES. Technical appendices should be used for this where appropriate.	
	10. Non-avian species surveys should have been completed no more than 18 months prior to submission of the application, to ensure that the survey results are a contemporary reflection of species activity at and around the site.	
	11. Two complete years of bird survey data should have been collected within the last 5 years (unless it can be demonstrated that a shorter period of survey is sufficient and this has been agreed in writing with SNH). Advice should also have been sought from SNH if some or all of the survey data has been collected more than 3 years ago *and* local or wider populations of key bird species are known to be changing rapidly. This also applies if there have been significant habitat changes between the survey being carried out and application submission that are likely to affect the level of bird activity in the area (eg the baseline has changed say from large area of mature plantation to clear felled open ground).	
	12. Bat surveys should follow the recommended levels of survey effort set out in the Bat Conservation Trust *Bat Surveys Good Practice Guidelines* (2nd edition, http://www.bats.org.uk/pages/batsurveyguide.html). Note that increased survey effort is required where *Nyctalus* bats or Nathusius' pipistrelle are likely to occur on a site, or if these species are recorded during initial surveys.	
	13. Full survey methodologies need not be presented in the ES where they have followed recognised methodologies that are publicly available (eg via the SNH website). A figure (see point 15 below) along with an outline description including dates, weather conditions (where relevant to the survey type) and how the survey was undertaken, along with a link to the methodology is sufficient. (Eg "*A habitat suitability survey following the Scottish Fisheries Coordination Centre methodology (http://www.sfcc.co.uk/resources/habitat-surveying.html) was undertaken on 12 July 2015 along the watercourses shown in figure X. Watercourses A and B were identified as having potential freshwater pearl mussel habitat, so were surveyed for freshwater pearl mussel on 13 July 2015*	

	following the SNH methodology (http://www.snh.gov.uk/docs/A372955.pdf). The weather when the surveys were carried out was dry, with little rain in the preceding week. Consequently the water was considered to be at normal level.")	
	14. Where survey methods or other work deviates from published guidance, deviations should have been agreed in writing with SNH in advance of carrying out survey work. A full description of the methodology used should be provided in the ES (technical appendices should be used for this where appropriate), along with an explanation of why any deviations are considered appropriate.	
	15. Figures should be used to show the area surveyed/transects/quadrat locations etc, for each survey undertaken. (It may be possible to include this information on the results map, where doing so will not obscure the results. For whole development site surveys, it may be appropriate to refer to the boundary shown on the site layout map, rather than provide multiple figures showing the same thing.)	
	16. An outline Decommissioning and Restoration Plan (DRP) should be submitted as part of the ES. It should provide an appropriate level of detail about how the site infrastructure is intended to be removed and how the site will be restored.	
	17. If you have confirmed details of all or part the grid connection at the time of ES submission, these details should be presented in the ES along with assessments of the impacts of the grid connection on the natural heritage (in particular, the nearby protected areas).	
Bird survey figures	18. A viewshed map should be presented, showing numbered vantage point locations, the 180 degree arc of view/visibility from each vantage point, and areas of overlap. The arc of views should be coloured in such a way that they are distinct from each other, and any overlaps are obvious (without obscuring the underlying topography and site detail).	
	19. Flight maps with labelled or otherwise defined (by colour and/or line type) flight lines, showing the flights banded into below, at and above collision risk height, referenced to a table of flight survey data. Depending on the amount of flight activity, it may be beneficial to present figures by species and/or breeding season (eg non-breeding season greylag geese flights on one figure, breeding greylag geese flights on another figure, breeding golden eagle flights on another figure, etc).	

	20. Nest/territory locations for target species should be included but comply with the *Guidance on Environmental Statements and Annexes of Environmentally Sensitive Bird Information* available via http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/windfarm-impacts-on-birds-guidance/.	
	21. All raw bird survey data should be included in an annex and should include the, dates, times and weather conditions of surveys.	
Advice for other ecological surveys and presentation of information	22. Peat: For sites with peat, a peat probe location, depth and peat slide risk maps should be presented. See section 2.b for further information.	
	23. Habitat maps: A habitat/NVC map should be presented, including locations of target notes, overlaid with the site detail as described in point 4 above.	

	24. Species survey figures: Species survey areas/transect, locations of results (eg otter couches, pine marten scats, etc) and target notes, overlaid with the site detail as described in point 4 above.	
	25. Species not surveyed for to inform the EIA/planning submission: The proposed mitigation plan should be provided in the ES/as part of the application submission, where such species are likely to be present on site. See section 2.d for further information.	
	26. Wild deer: If wild deer are present on or will use the development site, an assessment of the potential impacts on deer welfare, habitats, neighbouring and other interests (eg access and recreation, road safety, etc) should be presented. Where significant impacts may be caused, a draft deer management statement will also be required to address the impacts. We refer you to the advice found in *What to consider and include in deer assessments and management at development sites*, available via the link found within webpage http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/general-advice-and-information/.	
	27. Trees and forestry: If tree felling/woodland clearance will be required as part of the proposed development, we recommend that you contact Forestry Commission Scotland at as early a stage as possible to discuss the Control of Woodland Removal Policy and the implications it may have on the development. You should also refer to the SEPA, SNH and FCS joint guidance on how to approach development that will require felling of trees. The *Use of trees cleared to facilitate development on afforested land* guidance can be found under the “Planning Guidance Notes” section of the SEPA website http://www.sepa.org.uk/planning.aspx.	
	28. Recreation and access: The Landscape and Visual Impact Assessment (LVIA) should include consideration of impacts on the landscape setting of the site and the surrounding area and how this may affect the enjoyment of existing outdoor recreational users.	

	Consideration must also be given to the existing and potential use of the area for recreation by the general public, with reference to Scottish access rights under the Land Reform (Scotland) Act 2003 and rights of way.	
	29. Decommissioning/repowering: As decommissioning and redevelopment of wind farm sites are potential options, the EIA process should consider the implications and assess the likely impacts of both. This is because these are likely to be very different and may influence how the current proposal is developed. Guidance on decommissioning can be found on our website via the first link in section 2.a. *continued overleaf* The decommissioning and restoration plan presented in the ES can be brief. However, it should still provide an appropriate level of detail about how the site infrastructure may be removed and how the site is intended to be restored.	
Format of the ES and where to send it	30. For ease of use, text chapters and appendices of Environmental Statements should be presented on A4 paper (rather than A3). 31. Landscape figures to be provided in a ring binder (rather than being spiral or otherwise bound), for ease of use during site visits. 32. Unless otherwise advised by SNH, **a full hard copy of the entire Environmental Statement (including confidential annexes), plus a copy of the same on cd with file sizes of <10MB per pdf, should be sent direct to the SNH case officer. Electronic file names should clearly indicate their content** (eg "*LVIA Figure 6.18a - VP8 Bonar Bridge*"). (Where a SNH case officer has not been assigned or is unknown, you should contact the relevant SNH Area office to where their development is located, to ask who and where to send the ES. Contact details for SNH Areas and offices can be found via http://www.snh.gov.uk/about-snh/snh-in-your-area/)	

From: Paul Manning [redacted]
Sent: 26 April 2017 12:27
To: Melrose J (Joyce)
Subject: Re: Clashindarroch II Wind Farm, Clashindarroch, Aberdeenshire

I have no objections to this application.

Paul Manning.

Development Management and Strategic Road Safety
Trunk Road and Bus Operations

Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Direct Line: 0141 272 7386, Fax: 0141 272 7350
John.McDonald@transport.gov.scot

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Ms Joyce Melrose
Local Energy and Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref:
ECU00000409

Our ref:
TS00538

Date:
15/06/2017

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000 - CLASHINDARROCH II WIND FARM, HUNTLY, ABERDEENSHIRE

With reference to recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by SLR Consulting Limited (SLR) in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the review undertaken, we would provide the following comments.

We understand that Vattenfall Wind Power Ltd (Vattenfall) are seeking a scoping opinion in respect of the proposed Clashindarroch II Wind Farm, to be sited adjacent to the existing Clashindarroch Wind Farm approximately 6km south-west of Huntly in Aberdeenshire. The nearest trunk road to the site is the A96(T) which passes to the immediate south of Huntly.

Proposed Development

The SR indicates that the development will consist of approximately 16 turbines with a blade tip height of 149.9m and an installed capacity in excess of 50MW when considered with the existing development. The site will be accessed from the A920 which forms part of the local road network and as such, Transport Scotland has no comment to make on the access arrangements.

Abnormal Load Route

The SR indicates that the route for abnormal loads will be that used for the original Clashindarroch wind farm. The port of delivery would be Inverness and materials would be transported to the site via the A9(T), onto the A96(T) and then to the site access via the A920.

During the construction stage, abnormal loads as well as conventional construction vehicles will access the site via the A96(T) and the A920. We note the intention to conduct a desk-top study of the environmental impacts arising from the construction of the development and that this will include;

- Collection and analysis of available road traffic accident data over the defined study area;
- Swept path analysis for abnormal loads at potentially restricted locations along the abnormal loads access route (surveys undertaken over 1:1,250 scale OS mapping data);
- Road boundary data will be obtained for “pinch points”, to confirm (or otherwise) that the swept path of abnormal load vehicles would remain within the extent of the land owned by AC Highways;
- Determination of a construction phase programme and quantification of construction phase trips based on the quantity of material required for the proposed development and the duration of the construction phase;
- Determination of a traffic baseline, taking account of measured existing traffic flow (itemised under Field Surveys) and other wind farm developments, that have been identified for inclusion within the cumulative assessment; and
- Quantification of material increases in traffic resulting from the construction and operation phase of the proposed development.

In addition, detailed visual inspections will be undertaken of the proposed access routes. The locations of potential “pinch points” will be identified through visual assessment (based on the assessor’s experience) for further analysis. The potential effects, resulting from vehicle movements generated from the construction phase of the proposed wind farm will be assessed based on the material change in traffic levels and their effects on the baseline, including effects on road capacity, driver delay, community severance, road safety and the effects on vulnerable road users, for example, cyclists and pedestrians.

We are generally in agreement with the proposed approach. For the avoidance of doubt, we would note that potential trunk road related environmental impacts (associated with increased traffic) such as driver delay, severance, pedestrian amenity, safety etc should be considered and assessed where appropriate (i.e. where Institute of Environmental Management and Assessment (IEMA) Guidelines for further assessment are breached). These specify that road links should be taken forward for assessment if:

- Traffic flows will increase by more than 30%, or
- The number of HGVs will increase by more than 30%, or
- Traffic flows will increase by 10% or more in sensitive areas.

The methods adopted to assess the likely traffic and transportation impacts on traffic flows and transportation infrastructure should comprise:

- Determination of the baseline traffic and transportation conditions, and the sensitivity of the site and existence of any receptors likely to be affected in proximity of the trunk road network;
- Review of the development proposals to determine the predicted construction and operational requirements; and

- Assessment of the significance of predicted impacts from these transport requirements, taking into account impact magnitude (before and after mitigation) and baseline environmental sensitivity.

Where environmental impacts are fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by stating in the report:

- The work that has been undertaken;
- What this has shown i.e. what impact if any has been identified; and
- Why it is not significant.

It is not necessary to include all the information gathered during the assessment of these impacts, although this information should be available, if requested.

Noise/ Air Quality/ Vibration

The SR indicates within Chapter 11 that Noise Sensitive Receptors (NSRs) have been identified, all of which are in proximity to the proposed development. Given the expected trunk road traffic impacts, it is considered unlikely that there will be any significant impact on trunk road receptors in terms of noise, air quality or vibration. Transport Scotland, therefore, does not require any assessment of these effects to be included within the Environmental Statement.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 226 6923.

Yours faithfully

[redacted]

John McDonald

Transport Scotland
Trunk Road and Bus Operations

cc Alan DeVenny – SYSTRA Ltd.

25 April 2017

Joyce Melrose
Scottish Government
Energy Consents and Deployment Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Dear Ms Melrose,

Clashindarroch II Wind Farm, Aberdeenshire

Thank you for giving VisitScotland the opportunity to comment on the above wind farm development.

Our response focuses on the crucial importance of tourism to Scotland's local and national economy, and of the natural landscape for visitors.

Background Information

VisitScotland, as Scotland's National Tourism Organisation, has a strategic role to develop Scottish tourism in order to get the maximum economic benefit for the country. It exists to support the development of the tourism industry in Scotland and to market Scotland as a quality destination.

While VisitScotland understands and appreciates the importance of renewable energy, tourism is crucial to Scotland's economic and cultural well-being. It sustains a great diversity of businesses throughout the country. According to a recent independent report by Deloitte, tourism generates £11 billion for the economy and employs over 200,000 - 9% of the Scottish workforce. Tourism provides jobs in the private sector and stimulates the regeneration of urban and rural areas.

One of the Scottish Government and VisitScotland's key ambitions is to grow tourism revenues and make Scotland one of the world's foremost tourist destinations. This ambition is now common currency in both public and private sectors in Scotland, and the expectations of businesses on the ground have been raised as to how they might contribute to and benefit from such growth.

Importance of scenery to tourism

Scenery and the natural environment have become the two most important factors for visitors in recent years when choosing a holiday location.

The importance of this element to tourism in Scotland cannot be underestimated. The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product: a large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling wildlife watching and visiting historic sites.

The VisitScotland Visitor Experience Survey (2011/12) confirms the basis of this argument with its ranking of the key factors influencing visitors when choosing Scotland as a holiday location. In this

study, over half of visitors rated scenery and the natural environment as the main reason for visiting Scotland. Full details of the Visitor Experience Survey can be found on the organisation's corporate website, here: http://www.visitscotland.org/research_and_statistics/tourism_topics/wind_farms-1.aspx

Taking tourism considerations into account

We would suggest that full consideration is also given to the Scottish Government's 2008 research on the impact of wind farms on tourism. In its report, you can find recommendations for planning authorities which could help to minimise any negative effects of wind farms on the tourism industry. The report also highlights a request, as part of the planning process, to provide a tourism impact statement as part of the Environmental Impact Analysis. Planning authorities should also consider the following factors to ensure that any adverse local impacts on tourism are minimised:

- The number of tourists travelling past en route elsewhere
- The views from accommodation in the area
- The relative scale of tourism impact i.e. local and national
- The potential positives associated with the development
- The views of tourist organisations, i.e. local tourist businesses or VisitScotland

The full study can be found at www.scotland.gov.uk/Publications/2008/03/07113507/1

Conclusion

Given the aforementioned importance of Scottish tourism to the economy, and of Scotland's landscape in attracting visitors to Scotland, VisitScotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full. This includes when taking decisions over turbine height and number.

VisitScotland strongly agrees with the advice of the Scottish Government –the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.

VisitScotland would also urge consideration of the specific concerns raised above relating to the impact any perceived proliferation of developments may have on the local tourism industry, and therefore the local economy.

We hope this response is helpful to you.

Yours sincerely
[redacted]

Douglas Keith
Government and Parliamentary Affairs
VisitScotland