# CLASHINDARROCH II WIND FARM

**Gatecheck Stage 1 Report**

Prepared for: Vattenfall Wind Power Ltd

Technical Appendix 6.5

Technical Appendix 6.5
SLR Ref: 405.03640.00011
November 2019

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

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Our ref: AMN/16/GB
Our case ID: 300019748

10 August 2017

Dear Ms Tosun

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000
Clashindarroch II Wind Farm - Gatecheck Stage 1 Report

Thank you for your consultation which we received on 07 August 2017 about the above Gatecheck 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).

**Our comments**
We note that table 7.0 identifies the actions taken in response to our comments at the scoping stage of this development. We welcome the further consultation that was undertaken, and can confirm, as in our response letter dated 29 June 2017, that we are content with the approach to the assessment proposed. We do not have any more detailed advice to offer at this stage.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron and they can be contacted by phone on 0131 668 8657 or by email on Ruth.Cameron@hes.scot.

Yours sincerely

**Historic Environment Scotland**

# Clashindarroch II Wind Farm

# Gatecheck Stage 1 Report

SLR Ref:405.03640.0011
Version No:1
July 2017

## CONTENTS

## 1.0 INTRODUCTION

This document has been prepared by SLR Consulting in response to a request from Local Energy and Consents Unit of the Scottish Government for information for the Gatecheck Stage 1.

The document acknowledges that Environmental Impact Assessment (EIA) is an iterative process and that good design will evolve in response to environmental survey work. This document sets out the responses that have been received as a result of the Scoping process. It summarises the responses that were received and provides a summary of the way in which it is intended that the EIA process will respond to those comments.

The first section provides a list of the chapters that the Environmental Statement (ES) will contain and states the section of this report that covers those topics. The document then contains a series of tables which summarise the consultation process so far. Should one consultee comment on more than one EIA topic, then this comment is repeated in each topic summary. The consultation in respect of viewpoints and cumulative is detailed separately. The Design Freeze layout, which will be used within the eventual planning application is also provided.

## 2.0 ES CHAPTERS

It is proposed that the ES will be comprised of the following Chapters. Column 3 of Table 2-1 (below) lists the relevant section of this report which contains the summary of consultation responses to date for that topic.

**Table 2-1**
**Proposed ES Chapters and Location of Consultation Responses in this Report**

| ES Chapter Number | Chapter Name | Section of this Report covering the topic | Additional Comment |
|---|---|---|---|
| Chapter 1 | Introduction | Section 3 | Generic issues relevant to the EIA |
| Chapter 2 | Site Description and Design Evolution (including Forestry and Design) | Sections 3 and 14 | Forestry is covered in Section 14 of this report |
| Chapter 3 | Description of the Development | Sections 3 and 4 | Generic issues relevant to the EIA and Scoping process including response from the community |
| Chapter 4 | Renewable Energy and Planning Policy | | |
| Chapter 5 | Environmental Impact Assessment | | |
| Chapter 6 | Scoping and Consultation | | |
| Chapter 7 | Landscape and Visual Impact Assessment | Section 5 | Viewpoints are covered separately in Section 15 |
| Chapter 8 | Ornithology | Section 6 | Including Fisheries |
| Chapter 9 | Ecology | | |
| Chapter 10 | Cultural Heritage | Section 7 | Also includes references to archaeology |
| Chapter 11 | Hydrology, Hydrogeology and Geology | Section 8 | Also covers issues relating to peat, forestry removal and Ground Water Dependant Terrestrial Ecosystems (GWDTE) |
| Chapter 12 | Carbon Emissions | | |
| Chapter 13 | Access, Traffic and Transport | Section 9 | |
| Chapter 14 | Noise and Vibration | Section 10 | |
| Chapter 15 | Aviation | Section 11 | |
| Chapter 16 | Socio-Economics, Tourism, Recreation and Land Use | Section 12 | |
| Chapter 17 | Other Issues | Section 13 | e.g. Shadow Flicker, Telecommunications and Broadcast Services |
| Chapter 18 | Schedule of Mitigation | N/A | See topic section |

## 3.0 GENERIC EIA ISSUES (INCLUDING COMMENTS FROM THE SCOTTISH GOVERNMENT)

| Consultee Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
|---|---|---|---|---|
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion | **Transitional Provisions – Requests for Scoping Opinions**<br>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:<br>Where-<br>(a) a request for a scoping opinion is made before 16th May 2017; and<br>(b) the Scottish Ministers have not adopted a scoping opinion before that date;<br>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 Environmental Impact assessment (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. | The Clashindarroch II Wind farm Scoping Request was submitted to the Scottish Government on 5th April 2017. It was therefore scoped under regulation 4(1) and schedule 4 of the 2000 Regulations. |
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | The Scoping Opinion (page 2) states that:<br>"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." | Since submission of the Scoping Request in April 2017, the applicant Vattenfall Wind Power Ltd (Vattenfall) has sought and received legal advice, and the applicant will now be seeking planning consent for the Clashindarroch II Wind Farm as a new and separate section 36 Wind Farm application. For the avoidance of doubt Clashindarroch II will not be an extension to the existing scheme, however it will be considered in the context of the existing scheme for assessment purposes. |
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | **Site specific issues of interest to the Scottish Ministers**<br>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 | Noted. However we understand that as the proposal was scoped under regulation 4(1) and schedule 4 of the 2000 Regulations, that this will be an Environmental Statement (ES). |

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| | | | this opinion, as being addressed. | |
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | **EIA Directive**<br>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. | The new EIA Directive (2014/52/EU) was transposed into UK law in May 2017. It requires a number of new or amended environmental topics to be considered within the EIA process. These are:<br>• population and human health (replaces human beings);<br>• biodiversity (replaces flora and fauna);<br>• climate (replaces climatic factors); and;<br>• risks of major accidents and disasters (new).<br>Despite being scoped under the old regulations, the ES will aim to address these issues. Consideration of how traffic and transport impacts might impact upon human receptors will therefore be covered within the appropriate assessments. |
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | **Process Going Forward**<br>It is acknowledged that the EIA 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.<br>Applicants are reminded that there will be limited opportunity to materially vary the form and content of a proposed Development post submission.<br>When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA Report each of the specific matters raised in this scoping opinion has been addressed. | All comments are noted.<br>SLR have engaged with the Scottish Government in advance of scoping and will continue to liaise with them throughout the application process.<br>It is understood that a meeting has been offered to Aberdeenshire Council by the Scottish Government as part of the pre scoping process, but that the offer was not taken up. |
| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | **Consultation**<br>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.<br>All consultation responses received should be considered in full and Scottish Ministers expect the EIA Report to include all matters raised by the consultees. | Noted. |

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| Local Energy and Consents Unit - Lesley Tosun | 03/07/2017 | Scottish Government's Official Scoping Opinion (continued) | **Consultation (continued)**<br>Those consultees who did not respond, it is assumed that they have no comment to make on the Scoping Report. | The following consultees have not responded to the Scoping Report and it is therefore assumed that they have no comment to make on the Clashindarroch II Wind Farm Scoping process:-<br>- Aberdeen & Grampian Chamber of Commerce<br>- Cabrach Community Association<br>- Civil Aviation Authority – Airspace (CAA)<br>- Crown Estate<br>- Gartly Community Association<br>- Glass Community Association<br>- Huntly Community Council<br>- John Muir Trust<br>- Moray Council (MC) (in relation to LVIA Methodology)<br>- Mountaineering Scotland<br>- Ofcom<br>- Ramblers Association<br>Scottish Anglers National Association (SANA Ltd)<br>- Scottish Association for Country Sports<br>- Scottish Badgers<br>- Scottish Ornithologists Club (SOC)<br>- Scottish Wildlife Trust (SWT)<br>- Strathbogie Community Council |
| Neil Mair | 01/03/2017 | Scoping - General Comments | **General Scoping (01/03/17)** (Page 1-2)<br>Specific criteria and guidance are set out in Schedule 4 of the Environmental Impact Assessment (EIA) Regulations. In particular these include the characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen.<br>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 Environmental Statement (ES).<br>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.<br>Examples of the types of issues that should be addressed in full include (but not limited to): Climate change; Local Economic Effect; Landscape Resource; Soils and geology; Visual Amenity; Ornithology; Ecology; Nature Conservation; | All comments are noted. An appropriate level of survey and assessment of effects will be provided within the ES, with proposed mitigation measures as appropriate.<br>The list of proposed ES Chapters is included within Section 2 of this Report. All types of issues listed will be covered within an appropriate chapter of the ES. |

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| | | | 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; and Proposed mitigation measures. | |
| Environment Team - Marr - Historic Environment | 21/02/2017 | Scoping - General Comments (continued) | **Response from the Environment Team (21/02/17)**<br>Generic (Page 5 )<br>The proposed development will be designed and progressed as per current EIA regulations and best practice including EIA (Forestry) regulations.<br>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 Zone of Theoretical Visibility (ZTV) indications and a list of proposed viewpoints. | No Actions Required. |
| Sue Lawrence | 10/05/2017 | Scoping - General Matters | Request that in future a page setting out the differences between the different versions of the wind farms consulted on to date is provided.<br>Annex 1<br>Provides an SNH Checklist of Requirements for inclusion in the ES. | Noted. |

## 4.0 COMMUNITY COUNCILS

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue/Topic | Consultee Comments | SLR/Consultant Comments / Action |
|---|---|---|---|---|---|
| Cabrach Community Association | Deborah Smith | No Response | Scoping - Community | No Response | N/A |
| Gartly Community Association | Norman Simpson | No Response | Scoping - Community | No Response | N/A |
| Glass Community Association | Bob Yuill | No Response | Scoping - Community | No Response | N/A |
| Huntly Community Council | Tony Gill | No Response | Scoping - Community | No Response | N/A |
| Strathbogie Community Council | Unknown | No Response | Scoping - Community | No Response | N/A |
| Tap O'North Community Council | Paul Manning | 26/04/2017 | Scoping - Community | No Objection | No Actions required. |

## 5.0 LANDSCAPE AND VISUAL IMPACT ASSESSMENT

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
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| Aberdeenshire Council | Environment Team - Marr - LVIA | 21/02/2017 | Scoping -LVIA | **Response from the Environment Team (21/02/17)**<br>**Landscape and Visual Impact Assessment (**LVIA) (Page 4-5)<br>In terms of viewpoint selection, it is important that a degree of flexibility remains with identifying particular viewpoints/receptors at all stages of a proposed development planning application process. 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. | We are reviewing the viewpoint locations as the design development phases progress to ensure relevant locations are included. |
| | | | | 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. | Noted. These aspects will be included in the LVIA where relevant. |
| | | | | 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. | Noted. Design will take this into consideration as far as that is practicable. |
| | | | | The 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, scale, 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 effects caused when the Clashindarroch II project would be seen in combination with the existing Clashindarroch wind farm. | We acknowledge this is an integral part of our LVIA. |
| | | | | In terms of consultation, The Huntly Nordic Ski Club should be consulted as they use the Clashindarroch area for activities in winter. | SLR have contacted the Ski Club to request more information from them. |

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| Aberdeenshire Council | Environment Team - Marr - LVIA | 21/02/2017 | Scoping -LVIA (continued) | **Response from the Environment Team (21/02/17)**<br>Detailed Issues (Page 5)<br>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. | Noted. |
| | | | | In terms of potential landscape impacts, the physical impact of the proposal will potentially consist also 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 and designed to minimise any landscape and visual impacts. | These aspects will be included in the LVIA where relevant. |
| | | | | 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. | Noted. |
| | | | | 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. | Listed buildings and GDLs will be considered in the Cultural Heritage Assessment. The LVIA will also consider GDLs in so far as their contribution to the landscape character of an area. |
| | | | | 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. | These aspects will be included in the LVIA where relevant. |

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| | | | | Similarly, 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 proposed wind farm in currently existing woodland. This information is primarily to contribute to a comprehensive understanding of landscape and visual implications of this proposed development. | The forestry plans are acknowledged as an important part of the ES and will be given appropriate inclusion within it. |
| | | | | 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.<br>It is not recommended that advertising appear on any element of the turbines. | The comments are noted.<br>Decommissioning of the wind farm will be considered within the ES assessments. |
| | | | | Given the level of public interest and potential objection these developments can attract, it is important that the applicant submit a comprehensive package of landscape and visual information. | Noted |
| | | | | 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 other wind 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 (NPA), and Moray Council should also be consulted regarding any wind energy applications on their sides of the authorities' boundary. | We note Aberdeenshire's Wind Development datasheet was last updated September 2016. Along with our own internal databases we will ensure we have the most up to date cumulative information available to us at the time of design freeze prior to assessment. |
| | | | | 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. | We acknowledge the importance of the cumulative assessment. Our cumulative assessment will be undertaken in accordance with current guidance and including wirelines, |

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| | | | | | ZTVs and photomontages. |
| Aberdeenshire Council - LVIA Methodology | Peter Fraser - LVIA via Neil Muir | 18/05/2017 | Scoping - LVIA (Additional) | We have nothing particular to comment in relation to the viewpoint selection.<br><u>Neill Mair on Viewpoints –</u><br>As per previous advice, content to use the ZTV as a basis for identifying prominent viewpoints and sensitive receptors of the site, including those with cumulative impacts, as the selected views within LVIA. Covering the site from all angles, i.e. full circumference of the ZTV (albeit the ZTV will inform the distance of the viewpoints) would be sensible. | No Further Actions following previous correspondence. |
| Aberdeenshire Council - LVIA Methodology | Peter Fraser - LVIA | 18/05/2017 | Scoping - LVIA (Additional) | As SNH are being consulted on this application with regards to landscape and visual issues, in principal their advice takes precedence with regards to landscape and visual issues. | Noted |
| | | | | In terms of viewpoint selection, it is important that a degree of flexibility remains with identifying particular viewpoints/receptors at all stages of a proposed development planning application process. 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. | We are reviewing the viewpoint locations as the design development phases progress to ensure relevant locations are included. |
| | | | | As a general principle, the 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, scale, 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 effects caused when the Clashindarroch II project would be seen in combination with the existing Clashindarroch wind farm. | We acknowledge this is an integral part of our LVIA. |

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| | | | | In terms of potential landscape impacts, the physical impact of the proposal will potentially consist also 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 and designed to minimise any landscape and visual impacts. | These aspects will be included in the LVIA where relevant. |
| | | | | Similarly, 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 proposed wind farm in currently existing woodland. This information is primarily to contribute to a comprehensive understanding of landscape and visual implications of this proposed development. | The forestry plans are acknowledged as an important part of the ES and will be given appropriate inclusion within it. |
| | | | | 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. | Noted. |
| | | | | Given the level of public interest and potential objection these developments can attract, it is important that the applicant submit a comprehensive package of landscape and visual information. | Noted. |
| | | | | Cumulative impact - given the known level of commercial scale wind energy development in the vicinity of, and the surrounding region, it is important that the applicant fully address this issue. | Noted. |
| Aberdeenshire Council | Neil Mair - Residential Visual Amenity Assessment (RVAA) | 30/05/2017 | Scoping - RVAA | All properties within 2km would seem reasonable, but if the ZTV shows any within 5km that have high sensitivity/visibility we would ask for a visualisation from them too. | Following design freeze, the ZTV will be reviewed and the relevant properties included within the RVAA. |
| Aberdeenshire Council | Neil Mair- LVIA | 23/06/2017 | Scoping - LVIA (Additional) | Has no further comments in relation the LVIA Methodology. | No Actions required. |

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| Cairngorm National Park Authority (CNPA) | Katherine Donnachie | 09/05/2017 | Scoping - LVIA | <u>Planning Policy Context</u><br>The Planning Statement should include reference to, and consideration of, the Cairngorms National Park Partnership Plan. 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.<br>The Cairngorms National Park Partnership Plan 2012 – 2017 (NPPP) is the current adopted plan and is available (link provided). 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.<br>The NPPP sets out the vision and overarching strategy for managing the National Park. Three long term outcomes are set out as follows:<br>a) A special place for people and nature with natural and cultural heritage enhanced;<br>b) People enjoying the Park through outstanding visitor and learning experiences;<br>c) A sustainable economy supporting thriving businesses and communities.<br>The Plan emphasises the importance of the special qualities of the National Park and sets out principles for conserving and enhancing them. Including 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. | Noted |
| | | | | <u>Key policies which should be considered are:</u><br>- 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.<br>- 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 (CNP) 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 CNPA/SNH would be considering the impacts of the proposed development. | Noted |

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| | | | | - 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. | |
| | | | | <u>Landscape and Visual Assessment</u><br>- The comments of the CNPA Landscape Advisor set out key matters to be considered with any submission in order for CNPA and SNH to comment as consultees in relation to the impacts on the National Park. The following should be addressed<br>Boundary of Cairngorms National Park to be clearly shown on all material<br>- Visualisations to be provided from Little Geal Charn in the Ladder Hills including a cumulative visualisation.<br>- Consideration of impacts on special landscape qualities (including wildness). (The study referred to in relation to the Dorenell PLI can be provided if the applicants cannot find it readily on the Planning and Environmental Appeals Division (DPEA) website.<br>- It would be helpful when reporting any consultation to our Planning Committee if an indication of the route of the connection to the grid was provided. | Noted |
| | | | | 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.<br>As highlighted by our Landscape Advisor the following should be addressed<br>• Boundary of Cairngorms National Park to be clearly shown on all material<br>• Visualisations to be provided from Little Geal Charn in the Ladder Hills including acumulative visualisation.<br>• 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) | Noted. Comments on these aspects are covered below in response to the more detailed advice attached (written on the 27th April 2017). |
| Cairngorm National Park Authority (CNPA) | Frances Thin - Internal Specialist Response | 27/04/2017 | Scoping - LVIA | 1. Landscape Character and Setting<br>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 Scottish Natural Heritage (SNH) Landscape Character Area (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 National Park (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 | Noted. |

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| | | | | effect will in my view not be significant. | |
| | | | | 2. Landscape and Visual Effects<br>Extent of visibility<br>• The preliminary ZTV (blade tip) identifies the areas with theoretical visibility of the wind farm. These include visibility from;<br>• the Ladder hills from approx. 15km to 18km,<br>• the hills west of the Lecht, the hills of Carn Mor and Geal Charn north of Strathdon all at about 25km<br>the high ground west of the old military road between Strathdon and Glen Gairn at about 30km to 35km.<br>• the hills between Ballater and Glen Tanar at 35km to 40km<br>Overall, the extent of visibility across the National Park looks likely to be limited, with much of this beyond 25km | Noted. |
| | | | | Visual Impact and Design<br>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. | Noted. |
| | | | | Cumulative Effects on the CNP<br>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).<br>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. | Noted. |

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| | | | | 3. Special landscape qualities<br>The part of the National 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:<br>• The surrounding hills<br>• Extensive moorland, linking the farmland, woodland and the high tops<br>• Dominance of natural landforms<br>• Wildness<br>• Layers of receding ridge lines<br>• Grand panoramas and framed views<br>A landscape of opportunities<br>Understanding these qualities and how they are impacted upon by a proposal is a necessary part of undertaking the policy tests in statute and Scottish Planning Policy.<br>The ES should include a consideration of the impacts of the Clashindarroch on the Special Landscape Qualities (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 Qualities but CNPA/SNH can provide interim guidance on request. | Noted. |
| | | | | 4. Wildness and Wild Land<br>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.<br><u>Planning Context</u><br>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. | Noted. |
| | | | | 2.0 Viewpoints<br>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<br>The choice of the precise location for photography should be informed by | Noted. The Ladders Hills viewpoint will be from Little Geal Charn. |

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| | | | | consideration of both blade and hub ZTVs and site visits. | |
| | | | | 3.0 Baseline Conditions<br>a) For the Cairngorms National Park<br>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 Open data 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.)<br>b) For Landscape Character Information<br>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/<br>c) For Special Landscape Qualities<br>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<br>d) For Wild Land<br>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 | Noted. |
| | | | | 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;<br>• 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<br>• cumulative effects as experienced from the NP<br>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). | Noted. The LVIA will contain sufficient information and analysis to make an informed judgment on the effects on the CNP. |

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| Cairngorm National Park Authority (CNPA) - LVIA Methodology | Katherine Donnachie | 04/07/2017 | Scoping - LVIA (Additional) | CNPA wish to highlight the following points:<br>1. For the avoidance of doubt (in relation to impacts on designated landscapes), there will be a need for the applicants to demonstrate that they have assessed impacts on the special landscape qualities of the National Park. More detail on how to undertake such an assessment was provided in our original scoping response which included our Landscape Advisor's comments<br>2. In our original response we highlighted the need to fully consider cumulative impacts upon the National Park and we would highlight this to ensure it is captured in any submission - we requested a cumulative visualisation from Little Geal Charn<br>3. By way of completeness it is noted that the cumulative baseline figure C1.1 does not include a few wind farm sites currently at scoping stage namely Ourack to the west of Berryburn; Clashgour wrapping around Berry Burn; and an extension to Pauls Hill. Also Glenkirk has been refused. | All comments have been noted. |
| Huntly Nordic & Outdoor Centre | Peter Thorn | 29/04/2017 | Scoping - LVIA specific | The following points are considered to be LVIA specific:-<br>4) The Ski Club request a viewpoint assessment from a higher part of the Ski Trails as it is justified.<br>5) The Ski Club point out 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.<br>6) the Club point out that many members of the Club ski, walk, run and cycle throughout the entire Clashindarroch Forest. e.g. The British Nordic Development Squad host a well attended run/cycle fund raising event within the forest each summer. Recognise that some temporary access restrictions may be required during construction but would not want to see any dilution of the current open access enjoyed by all forest users. | We note the request for a viewpoint from the higher part of the ski trails. The ZTV shows potential blade tip visibility but this will be limited by the forestry itself and that the Clashindarroch turbines lie in front of the proposed Clash II Turbines. As stated above, SLR currently propose to provide viewpoints from The Buck and the Correen Hills which will represent the more open, higher views from relatively close proximity to the Ski Trails. |
| Scottish Natural Heritage (SNH) | Sue Lawrence | 10/05/2017 | Scoping - LVIA | <u>Landscape and visual impacts, including cumulative</u><br>- 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.<br>- Impacts on the Cairngorms National Park should be considered.<br>- Moderate effects could also be deemed to be significant where they can be | Noted. Comments on these aspects are covered below in response to the more detailed advice given on the 29th May. |

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| | | | | adequately supported by professional judgement.<br>- Response to updated view point list will be provided separately.<br>- Refers developer to guidance, including updated documents. | |
| Scottish Natural Heritage (SNH) - Landscape Methodology | Sue Lawrence/ Sarah Fletcher | 29/05/2017 | Scoping - LVIA (Additional) | <u>Wind Farm Design</u><br>The existing wind farm at Clashindarroch forms part of the immediate baseline landscape and so is highly pertinent to the consideration of the Clashindarroch II proposal. It will be important to consider the affect and influence of this wind farm on development design.<br>We consider that from the outset it is important for the applicant to consider (and clarify to consultees) whether Clashindarroch II will be, in landscape and visual terms, designed as an extension to the existing development. The proximal location between both developments and their location within the same sensitive Landscape Character Type1 (LCT Grampian Outliers) suggest this should be the case. Furthermore the amended cumulative ZTV illustrating ZTVs for the existing and proposed developments, shows pronounced extents of overlapping visibility such that the two developments will primarily be experienced as one much larger development.<br>To ensure some significant effects are mitigated from the outset, we consider that the relationship of Clashindarroch II to the existing wind farm should be carefully considered. There should be due cognisance of SNH design guidance and the findings from the Aberdeenshire Wind Farm Capacity Study (which highlights a presumption in favour of extensions to existing developments in certain LCTs, as opposed to new developments). In particular, we recommend further consideration is given to the scale of the Clashindarroch II development, with design objectives considering reduced heights of turbines, more commensurate with that existing at Clashindarroch, and reduced numbers of turbines.<br>The choice of turbine height is integral to the design process and a key issue in upland landscapes (SNH Siting and Designing Wind Farms in the Landscape V. 3 2017, paras. 2.15 and 2.16). The amended ZTV provided modelling variable blade tip heights is an interesting and potentially useful additional tool for understanding the variation in turbine visibility from the proposed development. However at this stage its use is hampered by the limited information presented on the turbine specification. Useful information which could inform consideration of this ZTV includes:<br>• turbine hub heights; and<br>• turbine blade lengths (to give the 'lowest' blade tip height, informing where the full swept blade diameter can be seen).<br>As a more minor observation, we are unsure as to the meaning of the legend information provided on the Cumulative ZTV ('Distance of ZTV calculations').<br>We assume that due to the height of the turbines (just under 150m tip) that there is no requirement for navigational lighting. The LVIA should take into account whether | The Wind Farm Design development is considered to have taken into account the relationship with Clashindarroch and the surrounding landscape and visual environment. The design process will be included within Chapter 2 of the ES. Full turbine details will be presented within the ES.<br>The CAA are being consulting with but it is normal practice for turbines under 150m not to require lighting. |

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| | | | | there would be any lighting. | |
| | | | | Methodology<br>As stated in our letter of 10 May 2017 commenting on the scoping report, we consider that Moderate effects should also be considered as significant where they can be supported by professional judgement. This is based on our extensive experience of dealing with and advising on effects from this type of large scale vertical development. This more flexible approach to assessment of significance is being adopted by a substantial proportion of the landscape profession who have experience in this type of work. | A letter has been sent to SNH in relation to this topic (dated 23rd June 17 and a copy provided in Appendix 1). At time of writing SNH had not been in a position to a respond. |
| | | | | Impacts on Designated Landscapes<br>There is the potential for significant cumulative impacts on the Cairngorms National Park. At this stage in the application process we defer to the Cairngorms National Park Authority for more detailed advice on this issue, where relevant. | We note CNP's detailed response and comment that they do not feel significant effects are likely on the CNP. |
| | | | | Landscape impacts<br>The distance of 15km distance for a more detailed analysis of landscape character should be justified by considering the underlying landscape character, relationship between character types and areas, and how the proposed development may affect this. Impacts on sensitive transitions in landscape character are of particular importance to consider at this stage. | We will review the potential ZTV of the final layout in considering the area for a more detailed analysis of potential landscape impacts. |
| | | | | Visual Impacts<br>We have no substantive comments to make on the proposed list of viewpoints for assessment. It may be that in further consultation with Moray and Aberdeenshire councils, the number of suggested viewpoints could be rationalised. This work should be informed by wirelines generated from viewpoint locations, modelling both the existing Clashindarroch and proposed Clashindarroch II developments (in turn informing cumulative/extension development design referred to above).<br>In the production of photomontages (location and number to be agreed) these should consider modelling not only the turbines, but also access tracks, substation, borrow pits and any deforestation required to more fully inform likely landscape and visual effects. | The viewpoint selection is being refined and will be finalised following design freeze. We note SNH's comment on including modelling of access tracks, substation, borrow pits and any felling. We propose that these will be shown on a selection of the viewpoint visualisations where they would be most seen and have potential for effects. |

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| | | | | <u>Cumulative Impacts</u><br>We agree with the proposed development scenarios listed in the Scoping Report (para 4.2.7 Cumulative Effects). However, we consider that the proposed 40km focussed study area should be agreed with Aberdeenshire Council (and Moray Council/SNH) on receipt of the wider 60km cumulative wind farm plan. It may be that a 40km area is acceptable, or could be even more focussed, but this should be agreed based on an understanding of cumulative patterns of development and pressure for change in Aberdeenshire and Moray. | Aberdeenshire Council have deferred to SNH and had no specific cumulative comments. We will review the cumulative site information and rationalise as appropriate. We will issue 60km search plan to consultees. |
| Scottish Natural Heritage (SNH) - Landscape Methodology | Joanna Patton to Sue Lawrence (cc Katherine Donnachie; Energy and Consents Unit (ECU) | 23/06/2017 | Scoping -LVIA Additional (continued) | Following the closure of the consultation period a letter was written to confirm the agreed approach and actions taken or proposed with regard to specific comments received on the LVIA methodology. The LVIA Methodology was issued to SNH (copied to CPNA and the ECU) on 23rd June. This is provided in Appendix 1.<br>The first document attached is a general summary of key points and includes our revised viewpoint schedule and cumulative 60km search plans. At time of issue there was a caveat that the project was still undergoing design development which could alter the ZTV from the scoping extents, and the exact viewpoint locations may change. The intention was stated to only consult again on this if there is a substantial difference. With regards to the cumulative search area, SLR have taken the latest information from Aberdeenshire Council, SNH, Department of Energy and Climate Change (DECC) and developers to ensure they have as an accurate plan as possible. The data has been presented across two plans to aid legibility due to the numerous smaller sites. As set out in previous correspondence, following design freeze, SLR will review the ZTV and 60km search area and include those cumulative sites which have potential for significant sequential or combined cumulative effects with the proposed Clashindarroch II Wind Farm.<br>The second document is a response to SNH's comment on methodology and moderate effects. SLR felt a detailed response was needed on this matter as they are concerned about the implications. SLR would be very happy to discuss this over the phone or a meeting with SNH's Landscape Architect colleagues if they feel this is necessary. | Following discussions between SNH, CNPA, Aberdeen Council and SLR, the proposed LVIA methodology was issued for their agreement. At the time of writing SNH had not yet been in a position to respond.<br>It should be noted that Moray Council have not provided any response to the LVIA Methodology. |

## 6.0 ECOLOGY AND ORNITHOLOGY

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
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| Aberdeenshire Council | Environment Team - Marr - Ecology | 21/02/2017 | Scoping - Ecology | **Response from the Environment Team (21/02/17)** (Page 2-3)<br>Ecology:<br>Local Nature Conservation Sites (LNCS):- 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 Special Site of Scientific Interest (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.<br>Wildcat:- The council 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.<br>The Habitat Management Plan - should identify opportunities for the management of existing habitats but also identify opportunities for biodiversity enhancement. | Comments and information on the LNCS's are noted.<br>Surveys have been undertaken to identify the presence of Wildcat and it is recognised that they may be present within the application boundary. Additional consultation is proposed to ensure that the most current information relevant to the project from the ongoing wildcat monitoring in the Strathbogie Wildcat Priority Area is considered in the assessment.<br>The Outline Habitat Management Plan (OHMP) will be developed as the EIA is further progressed and in addition to providing benefits to offset potential negative impacts, if required, additional nature conservation enhancements will be proposed. Discussions will be held with appropriate consultees to ensure the OHMP complements existing plans and other conservation initiatives as much as practicable. |

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| Deveron District Salmon Fishery Board (DDSFB) | Richard Miller | 24/04/2017 | Scoping - Ecology (Fisheries) | **Conditional Objection.**<br>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 Deveron, Bogie and Isla Fisheries Trust (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*.). Potential impacts on fish populations could include:-<br>- Construction:- noise/vibration disturbance; siltation; hydrological changes of the peat system; pollution; blocking or hindering upstream access for fish; and<br>- Operation:- poor road drainage, accelerated levels of erosion and the poor maintenance of silt traps and road crossings.<br>These potential effects could have a wide-ranging implications including:- direct mortality; 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.<br>DDSFB acknowledge that there will be baseline fisheries data collected and that there will also be surveys completed to identify deep areas of peat, which will ultimately help avoid those areas. The mitigation measures outlined in the document in terms of water quality and fish stocks and their habitats (both resident and migratory) are not considered adequate and are the basis of the conditional objection. DDSFB recommend that a formal Fisheries Management Plan is specified for the development and that the DDSFB will need to have full input during the formation of the plan to cover all concerns above. | A consultation meeting with the DDSFB and Deveron, Bogie and Isla Fisheries Trust representatives is proposed and is currently being scheduled following the recent Design Freeze of the proposed Clashindarroch II Wind Farm. It is considered that the water quality, fish and macroinvertebrate monitoring that was and is being undertaken for the operational wind farm (Clashindarroch I), should provide all of the necessary data for the Clashindarroch II EIA assessments. MBEC has agreed this with the DDSFB and DBIFT. It should be noted that there will be no new proposed water crossings for the proposed Clashindarroch II Wind Farm access tracks.<br>A Fisheries Management Plan similar to the plan that was put in place for the Clashindarroch I Wind Farm will be produced for the proposed Clashindarroch II development to safeguard fish, water quality and habitats. |
| Fisheries Management Scotland (FMS) | Brian Davidson | 12/05/2017 | Scoping - Ecology (Fisheries) | 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. Links to contacts for these were provided.<br>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. A | At the time of writing, a meeting with relevant members of the Deveron District Salmon Fishery Board and Deveron, Bogie & Isla Rivers Charitable Trust has been provisionally scheduled for early August 2017. |

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| | | | | link was provided to advice on Terrestrial Wind Farms | |
| Marine Scotland | Dr Emily Bridcut (contacted via generic email) | 10/05/2017 | Scoping - Ecology (Fisheries), Hydrology, Hydrogeology and Geology | 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.<br>The applicant is advised 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. Such information allows full assessment of the potential impacts of the proposed development and development of appropriate site specific mitigation measures and monitoring programmes.<br>MSS encourages the ES to provide details of a Water Monitoring Plan such as:-<br>- monitoring plans, water quality including hydrochemical and macroinvertebrate; and fish populations.<br>MSS provided web link to further information on site characterisation data and monitoring plans before, during and after construction<br>MSS advises to:<br>- Consider the potential impacts of felling and the cumulative impacts on the water quality and fish populations and fish passage within and downstream of the proposed development area; and<br>- Prepare a restoration and decommissioning plan, to include fisheries related issues<br>- Site characterisation surveys to determine fish species and their abundance, water quality (hydrochemical parameters) and the macroinvertebrate composition.<br>Provide details of proposed site specific mitigation measures and monitoring programmes, to avoid and/or reduce the potential impacts in the ES | All MSS comments are noted. Issues raised will be covered within the Ecology and Hydrology Assessments Chapters of the ES.<br>There is sufficient existing information in relation to fish populations and macrovertebrate composition for the Clashindarroch sub-catchments from sources such as the monitoring for the construction and operation of the existing Clashindarroch Wind Farm. This has been discussed and confirmed with the DDSFB and DBIFT. A provisional meeting date has been proposed for early August 2017. There will be no new water crossings proposed for the development of Clashindarroch II but the extent of survey information required will also be dependant on the felling plans for the site, which have not yet been finalised.<br>Operational Water Quality Data from the existing Clashindarroch Wind Farm has been obtained for the 2015 period and some additional surface water sampling will be undertaken prior to submission of the ES. A Water Quality Report will be provided as a Technical Appendix to the ES which will supplement the Hydrology, Hydrogeology and Geology Assessment.<br>Please also see the comments |

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| | | | | | in response to the Deveron District Salmon Fishery Board (above). |
| RSPB Scotland | Hywel Maggs | 09/05/2017 | Scoping - Ecology | Protected mammals seem to be adequately covered, especially wildcat. Recommend further consultation with appropriate groups in the development of any Habitat Management Plan that may be required. | Noted |
| Scottish Anglers National Association (SANA Ltd) | Unknown | No Response | Scoping - Ecology (Fisheries) | No Response | N/A |
| Scottish Badgers | Unknown | No Response | Scoping - Ecology | No Response | N/A |
| Scottish Environment Protection Agency (SEPA) | Alison Wilson | 19/04/2017 | Scoping - Ecology | <u>Site Specific comments</u>:-<br>- Turbines 2 and 3 are within 250m of the NVC survey area boundary rather than the recommended 500m.<br><u>Scoping Questions:-</u><br>- SEPA consider that the Phase 1 Habitat survey and NVC survey are sufficient to inform the EIA subject to the above comments on T2 and T3.<br>- There will be a need to assess whether the NVC community is a Ground Water Dependant Terrestrial Ecosystem (GWDTE).<br>- SEPA welcome the potential sources of impact in regard to GWDTE identified in Section 8.1.3.<br>- SEPA do not agree that decommissioning can be scoped out and ask that the general principles of the decommissioning are provided in the ES. | MBEC on behalf of their client Vattenfall can confirm that:-<br>- Phase 1 habitat and NVC surveys of the site have been completed. The information has been passed to the Hydrogeology team for consideration in the assessment of potential GWDTE impacts. |

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| RSPB Scotland | Hywel Maggs | 09/05/2017 | Scoping - Ornithology | RSPB observe that 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;<br>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.<br>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. RSPB accept 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"<br>There is a 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. 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) should be considered in the EIA. | The issues raised by the RSPB in relation to breeding bird survey effort and coverage, will be addressed through data obtained during summer 2017. Comments in relation to the possibility that felling could potentially attract hen harrier and other raptors into the site which they wouldn't previously have occupied are noted but will be dependant on the felling plans for the site. This issue will be monitored as felling and design plans for the forest are progressed, and mitigation will be proposed if considered necessary. |
| SNH | Sue Lawrence | 10/05/2017 | Scoping - Ecology and Ornithology | <u>Designated Sites</u><br>Raises the following main issues and advises careful consideration of these issues during the design iteration process. Refers applicant to published guidance.<br>- Development site is within the foraging range of common gull from the Tips of Corsemaul and Tom Mor Special Protection Area (SPA). There is connectivity with this SPA and the legislative requirements for European sites applies.<br>- The Craigs of Succoth SSSI appears to be immediately adjacent to the site boundary and consideration of the direct and indirect impacts on this site may be required 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.<br>-Agree that the habitat features of the following designated sites | Agreement has been reached on the scope and intensity of baseline ecology and ornithology surveys (as set out in the Scoping Report) that are required to inform the assessment of potential impacts on the key receptors through pre-scoping meetings with SNH. A specific assessment of the potential implications of the proposals (in combination with other plans or projects) on the Tips of Corsemaul and Tom Mor SPA conservation objectives (i.e. to inform an appropriate |

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| | | | | within 10km of the proposal site can be scoped out of the EIA:<br>- the Hill of Towanreef Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI),<br>- the River Spey SAC and the Moss of Kirkhill SSSI.<br>- review the list of sites and assess any additional sites affected as part of the design process. | assessment) will be provided by Vattenfall within the ES. SNH have agreed to provide current common gull count data relevant to the assessment of the SPA. |
| SNH | Sue Lawrence | 10/05/2017 | Scoping - Ecology | <u>Wildcat</u><br>The Scottish Wildcat Project Officer has new information since last contacted, and SNH 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.<br>SNH also encourage the applicant to liaise with the Project Officer when preparing the ES and developing mitigation recommendations for wildcat. | Further consultation with SNH wildcat project officers is proposed to ensure that the most current information relevant to the projects from the ongoing wildcat monitoring in the Strathbogie Wildcat Priority Area is considered in the assessment. |

## 7.0 CULTURAL HERITAGE

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
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| Aberdeenshire Council | Environment Team - Marr - Historic Environment | 21/02/2017 | Scoping - Cultural Heritage | **Response from the Environment Team (21/02/17) (Page 3-4)**<br>Historic Environment:<br>- 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"<br>- 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 overpowers 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<br>- 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 | The comments are noted.<br>SLR can confirm that effects on setting (and what elements of that setting contribute to how the asset is experienced and Understood) will be analysed in accordance with Historic Environment Scotland's "Managing Change in the Historic Environment: Setting (2016)".<br>Views from key cultural heritage assets have also been used to inform the design of the windfarm. Following Design Freeze a combination of GIS, and if necessary, photographs, wirelines and site visits will be used to undertake the assessment of effects on cultural heritage assets likely to be potentially affected by the proposed development. |
| Aberdeenshire Council | Environment Team - Marr - Historic Environment | 21/02/2017 | Scoping - Cultural Heritage (continued) | **Response from the Environment Team (21/02/17)**<br>Supporting Statement:<br>The methodology for assessment appears comprehensive and acceptable and for the avoidance of doubt should include:<br>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.<br>Stage 2: Define and analyse setting. How do the | All comments are noted. |

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| | | | | 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?<br>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.<br>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 and cultural identity.<br>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. | |
| Aberdeenshire Council | Environment Team - Marr - Historic Environment | 21/02/2017 | Scoping - Cultural Heritage (continued) | **<u>Response from the Environment Team (21/02/17)</u>**<br><u>Detailed Issues (Page 5)</u><br>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 | Listed buildings and Gardens and Designed Landscapes (GDLs) will be considered in the Cultural Heritage Assessment. The Landscape and Visual Impact Assessment (LVIA) will also consider GDLs in so far as their contribution to the landscape character of an area. |
| Archaeology Service for Aberdeenshire, Moray and Angus | Bruce Mann | 25/04/2017 | Scoping - Cultural Heritage | The proposed cultural heritage study areas are appropriate in this instance, and no changes are required. | No Actions required. |

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| | | | | There are no other relevant consultees not already listed by yourselves who should be consulted with respect to the cultural heritage assessment;<br>Having reviewed the intended methodology as laid out within Chapter 10 'Cultural Heritage' of the Scoping Report, no changes or additions are required. | |
| Historic Environment Scotland (HES) | Alison Baisden | 18/05/2017 | Scoping - Cultural Heritage | HES recommend consulting Aberdeen Council's archaeological and heritage advisors as they may hold information on additional assets.<br>- HES confirm that no heritage assets within HES remit are located within the development site boundary, but 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 potential impacts on the setting of the following heritage assets:- Beldorney Castle (Cat A Listed Building LB9164) - Requests a full assessment of impacts on the setting of the castle. Including a full appreciation of important views to and from the castle, with photomontages or wireframes to demonstrate whether the impacts, including cumulative impacts will occur.<br>- Wormy Hillock (Scheduled Monument (SM) Index No 3278) - Removal of forestry may make the windfarm visible from the henge, therefore recommend that the EIA should assess impacts on the henge. The assessment should take into account 'Historic Environment Scotland's Managing Change guidance note on Setting' as forestry cannot necessarily be relied upon to mitigate impacts on the setting of the monument as views of the turbines may be opened up if trees are felled. Requests that a photomontage and wireframe visualisation looking towards the wind farm is included within the assessment to demonstrate likely impacts.<br>- Tap O'North (SM No 63) - Welcomes that the monument is a viewpoint from a LVIA perspective. Considers that the EIA should also include an assessment of impacts on the setting of the fort as a cultural heritage feature. Including a full appreciation of the setting of the fort, taking into account views | Aberdeen Council's Archaeological and Heritage Advisors have been contacted. A letter was sent to Historic Environment Scotland (HES) on 9th June 2017, responding to the scoping comments raised by HES, further clarifying the basis for the assessment. As part of the response:-<br>- It was acknowledged that there may be circumstances where significant effects occur on the setting of heritage assets at a distance beyond 5km. SLR will therefore review designated assets further than 5km and may assess a selection of these if there is reason to think these are of a type that is likely to be particularly sensitive to long distance setting change impacts. This consideration will include Gallows Hill Cairn (Index Number 11576) and Auchindoun Castle (Index Number 90024).<br>- The approach to ZTV analysis was provided, confirming that the appropriate level of assessment will be undertaken in accordance with policy and taking due consideration of the HES Scoping Comments.<br>- The method of assessments to be taken in relation to Beldorny Castle (LB9164); Wormy Hillock (Scheduled Monument (SM) Index No 3278); Tap O'North (SM No 63); Gallows Hill Cairn (SM 11576); and Auchindoun Castle (SM 90024 & Property in the care of Scottish Ministers) were also provided. |

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| | | | | both from and towards it. 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.<br>- Gallows Hill Cairn (SM 11576) - It is a ceremonial or ritual monument, and 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 HES requests a wireframe visualisation looking towards the wind farm to be included in the EIA to demonstrate the likely impact, including the cumulative impacts.<br>- Auchindoun Castle (SM 90024 & Property in the care of Scottish Ministers) - Outward views from the castle and views towards it are an important parts of its setting. The proposed development site boundary is located approximately 8km to the NW of the Castle. Concerns that the turbines amy 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, HES would welcome an assessment of impacts on this site, to include a photomontage and wireframe looking towards the wind farm to demonstrate the likely impact, including the cumulative impact.<br>HES recommend that ZTV analysis is undertaken to select additional heritage assets for assessment that may be affected by the wind farm. Do not consider that the 5km assessment area identified within the EIA Scoping Report is sufficient in this instance.<br>HES recommend that the EIA is supported by appropriate visualisations (photomontage and/or wireframe views) where impacts are likely to be highest. Cumulative assessment and visualisations should also be used.<br>HES recommend that the EIA consults the HES | - Confirmation of the Study Area and use of appropriate visualisation for the main and cumulative assessments.<br>- Confirmation of Guidance to be used. The letter is provided in Appendix 2. In a response letter dated 29th June 2017, the HES Case Officer advised that they were happy with the approach (see below). |

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| | | | | Managing Change guidance notes & HES EIA Guidance notes. | |
| Historic Environment Scotland (HES) | Alison Baisden | 29/06/2017 | Scoping-Cultural Heritage (continued) | HES are content with the approach to the Cultural Heritage Assessment as set out in an email dated 9th June 2017 | No Further Actions required following previous correspondence. |

## 8.0 HYDROLOGY, HYDROGEOLOGY, GEOLOGY AND CARBON EMISSIONS

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR/Consultant Comments/ Action |
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| Scottish Environment Protection Agency (SEPA) | Alison Wilson | 19/04/2017 | Scoping - Hydrology, Hydrogeology and Geology | The following key issues must be included in the EIA to avoid delay and potential objection:<br>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.<br>b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.<br>c) Map and assessment of impacts upon groundwater abstractions and buffers.<br>d) Peat depth survey and table detailing re-use proposals.<br>e) Map and table detailing forest removal.<br>f) Map and site layout of borrow pits.<br>g) Schedule of mitigation including pollution prevention measures.<br>h) Borrow Pit Site Management Plan of pollution prevention measures.<br>i) Map of proposed waste water drainage layout.<br>j) Map of proposed surface water drainage layout<br>j) Map of proposed water abstractions including details of the proposed operating regime.<br>k) Decommissioning statement. | SEPA comments are noted. |
| Scottish Environment Protection Agency (SEPA) | Alison Wilson | 19/04/2017 | Scoping - Hydrology, Hydrogeology and Geology (continued) | <u>Scoping Questions:-</u><br>- There will be a need to assess whether the National Vegetation Classification (NVC) community is a Ground Water Dependant Terrestrial Ecosystem (GWDTE).<br>- SEPA welcome the potential sources of impact in regard to GWDTE identified in Section 8.1.3.<br>- SEPA welcome that the following technical reports will be prepared as Technical Appendices to the ES (and the mitigation measures detailed):- Schedule of Water crossings; Peat slide Risk Assessment and Management Plan; and Borrow Pit Appraisal.<br>- SEPA welcome peat probing to be undertaken to assess peat identified on site and expect the application to be supported with a comprehensive site specific Peat Management Plan (PMP). | - The EIA assessment will consider engineering works in and near the water environment and include an assessment of flood risk.<br>- Surveys will be completed to identify potential areas of GWDTE and required mitigation in order to prevent any impacts on these habitats.<br>- Groundwater abstractions (private and licensed) will be assessed and mitigation measures proposed if required. |

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| | | | | - SEPA welcome that a peat probing survey will be undertaken and a NVC survey for the site will be used to screen for the potential presence of GWDTEs. Further information on the requirements are provided in the appendix to the response.<br>- SEPA do not agree that decommissioning can be scoped out and ask that the general principles of the decommissioning are provided in the ES.<br>- SEPA hold records of flooding in both the catchments likely to be affected, and in Huntly – most recently in January 2016. Therefore SEPA welcome that a basic FRA will be prepared ensuring that flood risk downstream is not increased.<br>- SEPA state that " 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.<br><u>Regulatory Advice</u><br>- Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended).<br>- Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011.<br>- Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.<br>- Consider if other environmental licences may be required for any other installations or processes.<br>- Details of the location of regulatory requirements and good practice advice was provided by SEPA. | - A peat depth survey will be completed and re-use of peat proposals will be detailed.<br>- Forest removal proposals (and any potential impacts and required mitigation) will also be presented.<br>- A borrow pit assessment will be prepared.<br>- Embedded mitigation in the site design will be detailed and a schedule of mitigation measures required to manage residual risks will be presented.<br>- Mitigation measures and proposals for development and management of the borrow pit(s), surface water and waste water drainage, and potential water abstraction will also be presented.<br>- Principals for wind farm decommissioning will be detailed. |
| Scottish Environment Protection Agency (SEPA) | Alison Wilson | 19/04/2017 | Scoping - Hydrology, Hydrogeology and Geology (continued) | **Appendix 1 - List of Detailed Scoping Requirements :-**<br>This included a list of latest information requirements from SEPA that should accompany a planning application. The full list is not replicated here but two specific items are highlighted:-<br>**Disturbance and re-use of excavated peat and other carbon rich soils**<br>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, | All requirements are noted. Comments are made in relation to just two of these requirements:-<br>- Disturbance and re-use of excavated peat and other carbon rich soils - The Design of the Wind Farm and the information provided within the ES |

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| | | | | applicants must assess the likely effects of development on carbon dioxide (CO2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO2 to the atmosphere. Developments must aim to minimise this release."<br>**Borrow Pits**<br>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. | would comply with these peat requirement. The location of the proposed wind farm is considered to lie in area of the site that this is almost devoid of peat so much of the requirements will not be applicable.<br>- Borrow Pits - The planning submission will comply with the policy statement. |
| SNH | Sue Lawrence | 10/05/2017 | Scoping - Hydrology, Hydrogeology and Geology | <u>Peat</u><br>Refer applicant to Carbon and Peatland Map 2016 which 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/.<br>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. | Noted |
| Scottish Water | Rebecca Williams | 19/04/2017 | Scoping - Hydrology, Hydrogeology and Geology | <u>Drinking Water Protected Areas</u><br>The site 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.<br>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 of the Scottish Water response details a list of precautions and protection measures to be taken within a DWPA and the wider drinking water catchment.<br>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 have confirmed the site might be within catchments to their water supplies. Following this confirmation, an assessment of any existing data will be undertaken to identify any likely potential effects.<br>If additional data is required, this will be requested from Scottish Water and further consultation held as required.<br>The drinking water catchment areas and location of the water mains have been considered as constraints during the design of the wind farm.<br>Additional information on |

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| | | | | | existing water quality and private water supplies is being sought to inform the assessment. |
| Scottish Water | Rebecca Williams | 19/04/2017 | Scoping - Hydrology, Hydrogeology and Geology (continued) | <u>Scottish Water Assets</u><br><u>T</u>here are Scottish Water assets within the proposed site (including the access route):-<br>• Two raw water mains in potential conflict with the site access route;<br>- 1x 6" asbestos cement main; and<br>- 1x 9" cast iron main.<br>The location of the assets should be confirmed through obtaining detailed plans from our Asset Plan Providers. 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.<br>If 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.<br>Works which take place within a DWPA or drinking water catchment require pre-cautions. Annex 1 of the response includes a list of precautions to be taken when working within the vicinity of Scottish Water assets.<br>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. | Scottish Water have also confirmed that they have existing infrastructure within the site boundary. Detailed Plans will be obtained from their Asset Plan Providers.<br>Requirements to comply with Scottish Water's processes, standards and policies have been noted, as well as any list of precautions. |

## 9.0 ACCESS, TRAFFIC AND TRANSPORT

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
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| Aberdeenshire Council | Roads - Kincardine & Mearns Marr | 14/02/2017 | Scoping - Access, Traffic and Transport | **Response from Roads (14/02/17)**<br>No concern relating to EIA. Road already there to serve existing turbines. A traffic management plan would be required. | A Construction Traffic Management Plan (CTMP) will be provided as a Technical Appendix to the ES. |
| Transport Scotland | John McDonald | 15/06/2017 | Scoping - Access, Traffic and Transport | Proposed Development<br>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. | No Actions required. |
| Transport Scotland | John McDonald | 15/06/2017 | Scoping - Access, Traffic and Transport (continued) | Abnormal Load Rout<br>In the Scoping Report SLR 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. | Since the submission of the Scoping Report, SLR, on behalf of their client Vattenfall Wind Power Limited (Vattenfall) has undertaken a preliminary Abnormal Loads Route Assessment (ALRA). This has identified that the most viable route for transport of materials to the site is likely to be along the A596 from the port of Aberdeen, then via the A96 to the site access via the A920. SLR would welcome any additional comments from Transport Scotland on this alternative route choice. |
| Transport Scotland | John McDonald | 15/06/2017 | Scoping - Access, Traffic and Transport (continued) | Transport Scotland 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;<br>• Collection and analysis of available road traffic accident data over the defined study area;<br>• 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);<br>• 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 | IEMA Guidance will be used in the preparation of the Traffic and Highways assessment. |

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| | | | | owned by Aberdeen Council Highways;<br>• 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;<br>• 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<br>• Quantification of material increases in traffic resulting from the construction and operation phase of the proposed development.<br>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. Transport Scotland 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:<br>• Traffic flows will increase by more than 30%, or<br>• The number of HGVs will increase by more than 30%, or<br>• Traffic flows will increase by 10% or more in sensitive areas.<br>The methods adopted to assess the likely traffic and transportation impacts on traffic flows and transportation infrastructure should comprise:<br>• Determination of the baseline traffic and transportation conditions, and the sensitivity of the site and existence of | |

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| | | | | any receptors likely to be affected in proximity of the trunk road network;<br>• Review of the development proposals to determine the predicted construction and operational requirements; and<br>* Assessment of the significance of predicted impacts from these transport requirements, taking into account impact magnitude (before and after mitigation) and baseline environmental sensitivity.<br>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:<br>• The work that has been undertaken;<br>• What this has shown i.e. what impact if any has been identified; and<br>• Why it is not significant.<br>It is not necessary to include all the information gathered during the assessment of these impacts, although this information should be available, if requested. | |
| Transport Scotland | John McDonald | 15/06/2017 | Scoping - Access, Traffic and Transport (continued) | <u>Noise/ Air Quality/ Vibration</u><br>SLR 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. | No Actions required. |
| Transport Scotland | John McDonald | 15/06/2017 | Scoping - Access, Traffic and Transport (continued) | Additional Comment from John MacDonald (within a covering email):-<br>As part of our requirements, we would expect your assessment to provide an Abnormal Loads Assessment for the trunk road network. This should include swept path analysis, identification of any measures required along the route including the temporary removal of street furniture, any proposed junction widening, traffic management etc to ensure that the movement of these loads along the trunk road will not have any detrimental effect on structures within the route path. | An Abnormal Loads Assessment for the trunk road network would be provided as a Technical Appendix to the ES. This would include swept path analysis at key locations along the route and a brief overview of the likely requirements for street and road alterations. A route drive through using an appropriately sized trailer would be required before specific details in relation to the temporary removal of street furniture, proposed junction widening and traffic management could be provided to Transport Scotland. It is proposed that |

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| | | | | | this would be done following the receipt of any planning consent and could be secured by an appropriate planning condition if necessary. |

## 10.0 NOISE AND VIBRATION

| Consultee Name | Contact Name | Date of Correspondance (Dated as written) | Scoping Issue/Topic | Consultee Comments | SLR/Consultant Comments/ Action |
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| Aberdeenshire Council | Environment Team - Marr - Noise | 14/02/2017 | Scoping - Noise | **Response from Environmental Health (14/02/17)**<br>**Noise**<br>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. | All current and relevant best practice guidance for the Noise Assessment will be followed. Early engagement with Environmental Health has started and this will continue throughout the assessment process, specifically with respect to the requirements for background noise monitoring in relation to the Design Freeze layout, which has just been established. The EHO for the development will be Louise Cunningham (Inverurie office). |

## 11.0 AVIATION

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
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| BAA Aerodrome Safeguarding (Aberdeen) | Kirsteen MacDonald | 17/05/2017 | Scoping - Aviation | **Potential Objection**<br>The proposed site is located within the wind farm consultation zone for Aberdeen International Airport (AIA) and as such aviation impacts should be considered as part of the EIA:-<br>- The proposed turbines may be detected by Aberdeen Airport's primary surveillance radar and generate clutter on air traffic control displays; and<br>- 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;<br>AIA's 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 | Once design freeze is complete and the development parameters have been provided to Osprey, consultation will commence with Aberdeen International Airport (AIA) on behalf of our client Vattenfall. AIA operates two National Air Traffic Service (NATS) radar systems for the provision of Air Traffic Control (ATC) services (Allanshill and Perwinnes). Osprey have completed a radar line of sight (LOS) analysis which confirms the results of the NATS Technical and Operational Assessment (NATS TOPA), which indicates that the Allanshill radar will detect the turbines of the proposed development. The Osprey LOS analysis confirms that the Perwinnes radar, theoretically, will not detect the turbines of the proposed development. AIA have been provided with the design freeze turbine coordinates and will complete a radar impact assessment to inform their position. Once AIA have completed their assessment, Osprey will be in a position to discuss the extent of any potential impact on airport infrastructure including radar systems with the airport safeguarding team. It is expected that discussions will start in the near future. |
| Civil Aviation Authority – Airspace (CAA) | Mark Deacon | No Response | Scoping - Aviation | No Response | N/A |
| Defence Infrastructure Organisation (DOI) i.e. Defence Estates / Ministry of Defence (MoD) | Claire Duddy | 12/05/2017 | Scoping - Aviation | **MOD Objection.**<br>The Defence Infrastructure Organisation (DOI) would object to the proposed development based on:-<br>- Unacceptable interference to Air Defence (AD) Radar at Remote Radar Head (RRH) Buchan (66.7km away) due to false radar returns. | Osprey consider that the MoD are likely to require mitigation for the impact that the development might create to the Buchan Air Defence Radar (ADR). Consultation with the MoD will provide further information on a |

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| | | | | An Air Defence Subject Matter Expert concludes that the turbines would have a significant and detrimental effect on the AD Radar due to a number of factors:-<br>- Detectability of the turbines<br>- Position of the Development<br>- Number of turbines within the development<br>- Other developments within the vicinity.<br>Objection relates to, but is not limited to:-<br>- 15 of the turbines are detectable by AD Radar at RRH Buchan<br>- The number of turbines visible to the radar would exceed the cumulative effect.<br>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 | mitigation route. It is proposed that consultation will take place following the design freeze and will likely involve further analysis by the MoD in order to establish if a technical solution to the impact can be developed through the use of a Non Automatic Initiation Zone (NAIZ). The establishment of a NAIZ surrounding turbines prevents the radar from both displaying false radar returns from turbines and initiating new tracks associated with primary radar returns within the zone. A radar track which has been formed from returns originating outside the NAIZ should still be trackable if it enters the NAIZ e.g. an aircraft transiting over the NAIZ. The lighting requested by the MoD will be based on mitigation of impact to military low flying operations. The MoD have been provided with turbine design freeze parameters, consultation with the MOD is ongoing. |
| National Air Traffic Services (NATS) | Sarah Allen | 28/04/2017 | Scoping - Aviation | **NATS Enroute Objection**<br>Objection due to conflicts with their safeguarding criteria. | Osprey Consulting Services on behalf of their client Vattenfall, can confirm that NATS have completed an enroute Technical and Operation Assessment (TOPA) (NATS Reference W(F)21494) which indicates that the proposed development would be within radar coverage of the Allanshill, Perwinnes and Tiree radar systems. Section 3.1 of the TOPA provides the results of the assessment which indicates that only the Alanshill Radar would be impacted. Section 3.1.2 of the TOPA provides information on which receptors would be impacted by the predicted interference to the Alanshill Radar (i.e., Aberdeen International Airport, MoD and the Scottish Area Control Centre which is located at Prestwick, Ayrshire (not to be confused with Glasgow Prestwick Airport) and other users. A Primary Radar Mitigation Scheme (PRMS) has been recognised as mitigation for the effect to Alanshill, and negotiations between Vattenfall and NATS are currently continuing. |

## 12.0 SOCIO-ECONOMICS, TOURISM, RECREATION AND LAND USE

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
|---|---|---|---|---|---|
| British Horse Society Scotland | Julie Hanna | 31/05/2017 | Scoping - Socio-economics, Tourism, Recreation and Land Use. | Generic Response with Guidance Note attached. | Noted. |
| Huntly Nordic & Outdoor Centre | Peter Thorn | 29/04/2017 | Scoping - Socio-economics, Tourism, Recreation and Land Use. | Outline of concerns:-<br>1) would object to any clear felling of trees on or adjacent to the Ski Trails as they help collect the drifting snow then their shade protects the snow from thaw.<br>2) would object to any operations that damaged the road surfaces or hindered skiing. Request to know locations of the borrow pits in case they are near ski trails.<br>3) would object to any restrictions to access onto the Ski Trails as a result of construction and/or operation of the wind farm<br>4) Request a viewpoint assessment from a higher part of the Ski Trails as it is justified<br>5) Point out 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<br>6) Point out that many members of the Club ski, walk, run and cycle throughout the entire Clashindarroch Forest. e.g. The British Nordic Development Squad host a well attended run/cycle fund raising event within the forest each summer. Recognise that some temporary access restrictions may be required during construction but would not want to see any dilution of the current open access enjoyed by all forest users. Recommend that contact is made with Snowsport Scotland who will be able to provide more general information on Nordic skiing in Scotland. | All the concerns of the Ski Club have been noted and SLR on behalf of their client Vattenfall have written to the Ski Club to request further information in relation to:- the extent of Ski Trails; their location; the Clubs use of other areas of the forest including moorland; information in relation to races and events; and the access points to these events.<br>In relation to point 5, and the fact that skiers ski over open moorland areas where they may experience a visual impact from the proposals, SLR have informed that Club that we currently propose to provide viewpoints from The Buck and the Correen Hills which will represent the more open, higher views from relatively close proximity to the Ski Trails. |

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| | | | | Provided a broad map of the location of the Ski Trails in relation to the proposed development site boundary. | |
| Mountaineering Scotland | Unknown | No Response | Scoping - Socio-economics, Tourism, Recreation and Land Use. | No Response | N/A |
| Ramblers Association | Unknown | No Response | Scoping - Socio-economics, Tourism, Recreation and Land Use. | No Response | N/A |
| Scottish Association for Country Sports | Unknown | No Response | Scoping - Socio-economics, Tourism, Recreation and Land Use. | No Response | N/A |
| Scottish Rights of Way and Access Society (Scotways) | Eleisha Fahy | 12/06/2017 | Scoping - Socio-economics, Tourism, Recreation and Land Use. | The National Catalogue of Rights of Way shows right of way GG1 is affected by the area within the site boundary. A map was provided by Scotways 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 Scotway's notice.<br>There may now be general access rights over any area of land under the terms of the Land Reform (Scotland) Act 2003. Scotways suggest the applicant consult the Core Path Plans, prepared by access authorities as part of their duties under this Act.<br>Scotways records indicate that the area within the site boundary is well-used for various types of recreational access and as such, walkers, runners, mountain bikers, horse-riders, skiers etc should be consulted. The local authority access teams may also be able to provide advice.<br>Figure 3.1 Indicative Turbine Layout provides no information regarding the track layout associated | The location of GG1 has been noted.<br>Further information in relation to recreational use of the land aside from formal rights of way will be sought including (but not limited to) information on Core Paths, information from the local authority access officer, FCS and the Huntly Nordic Ski Club.<br>Further information on the design of the wind farm, turbine locations, site access and access tracks and may access management plan will be provided within the ES as part of the planning application. |

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| | | | | with the turbines and their connection tot he public road network. Scotways 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 attention to the following:-<br>*Extract from the Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8)*<br>*Proximity to highways and Railways*<br>*2.25 It is advisable to set back all wind turbines a minimum distance, equivalent tot he height of the blade tip, from the edge of any public highway (road or there public right of way) or railway line.*<br>Scotways also expressed interest in receiving further details regarding the proposed location of the turbines, their associated tracks, the site's own access requirements and any access management plan in due course.<br>If a map showing rights of way and other recreational routes over an area wider than the site itself would aid production of the LVIA, the applicant is welcome to contact the society directly. | |
| Sustrans | Neill Malone | 13/04/2017 | Scoping - Socio-economics, Tourism, Recreation and Land Use. | The proposed development does not appear that it will have any impact upon Sustrans routes. | No Actions required. |
| Visit Scotland | Douglas Keith | 25/05/2017 | Scoping - Socio-economics, Tourism, Recreation and Land Use. | Tourism is crucial to Scotland's local and national economy. The character and visual amenity of Scotland's landscapes is a key driver of tourism. According to a recent study by Deloitte tourism generates £11bn for the Scottish economy and employs over 200,000 people - 9% of the Scottish Workforce.<br>The Visit Scotland Visitor Experience Survey (2011/12) confirms the importance of scenery to tourism, with over half of visitors rating scenery and the natural environment as the main reason for visiting Scotland.<br>Reference to Scottish Government 2008 research | In developing the Clashindarroch II Wind Farm, SLR on behalf of their client Vattenfall is concerned to ensure that issues regarding potential effects on the area's tourism economy are fully assessed and addressed. A letter was sent to Visit Scotland on the 3rd July 2017, outlining the proposed basis for the assessment and seeking agreement and further comment if necessary.<br>In summary it stated that the assessment will draw on the findings of published studies that examine whether there is a link between the development of windfarms and changes in |

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| | | | | on the impact of wind farms on tourism; which specifies recommendations to minimise negative effects of wind farms on the tourism industry. In line with this report, it is requested that an independent tourism impact statement is provided as part of the Environmental Impact Analysis.<br>Planning authorities should also consider the following factors to ensure that any adverse local impacts on tourism are minimised:<br>- The number of tourists travelling past en-route elsewhere<br>- The views from accommodation in the area<br>- The relative scale of tourism impact i.e. local and national<br>- The potential positives associated with the development<br>- The views of tourist organisations, i.e. local tourist businesses or Visit Scotland<br>Visit Scotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full; particularly in reference to decisions over turbine height and number. Cumulative effects should also be considered. | patterns of tourism spend and behaviour, for example studies such as (but not limited to) the BiGGAR Economics report published in July 2016: Wind Farms and Tourism Trends in Scotland. SLR will examine the potential for local effects to arise at both construction and operational stage, including effects on specific local receptors such as recreational facilities and accommodation businesses.<br>The letter is attached as Appendix 3. |

## 13.0 OTHER ISSUES

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
|---|---|---|---|---|---|
| British Telecom | Dale Aitkenhead | 04/05/2017 | Scoping - Other Issues | The project should not cause interference to BT's current and presently planned radio networks. | No Actions required. |
| Crown Estate | Joan McGrogan | No Response | Scoping - Other Issues | No Response | N/A |
| John Muir Trust | John Low | No Response | Scoping - Various/ Other Issues | No Response | N/A |
| Joint Radio Company (JRC) | Wind Farm Team | 25/04/2017 | Scoping - Other Issues | Proposal has no impacts on radio link infrastructure operated by JRC. | SLR on behalf of Vattenfall intend to reconsult with JRC following the Design Freeze to confirm that impacts will not occur. |
| OfCom | Unknown | No Response | Scoping - Other Issues | No Response | N/A |

## 14.0 FORESTRY

| Consultee Name | Contact Name | Date of Correspondence (Dated as written) | Scoping Issue / Topic | Consultee Comments | SLR / Consultant Comments / Action |
|---|---|---|---|---|---|
| Forestry Commission Scotland (FCS) | Ian Cowe | 12/05/2017 | Scoping - Forestry | Relevant discussions on forestry matters should take place before the submission of the ES. The developer should consult the Grampian Conservancy office. | On behalf of their client Vattenfall, RDS Forestry Ltd will undertake the relevant discussions on forestry matter prior to the submission of the ES. |
| | | | | Ancient woodland is present within the development site and all effort should be made to prevent any loss. If development operations are to occur in close proximity to these areas then a Tree Protection Plan should form part of the forestry chapter of the ES. | Noted. However, it is not currently anticipated that there would be any direct impacts to Ancient Woodland areas from the proposed wind farm layout. |
| | | | | Turbines are proposed within woodland - map included to show National Woodland Inventory areas. Areas within the development site that have recently been felled were done under approval from FCS and have restocking obligations attached. These areas are considered as woodland under the Scottish Government's Control of Woodland Removal Policy. | Noted. |
| | | | | The location of the on-site substation should be considered carefully, with its location designed so it and the subsequent grid connections minimise impact on the forest environment. | Noted. the wind farm will and has been designed to minimise environmental impacts where ever practicable. |
| Forestry Commission Scotland (FCS) | Ian Cowe | 12/05/2017 | Scoping - Forestry (continued) | <u>Responses to Scoping Questions</u><br>FC 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.<br>Ancient Woodland should be included in the list of detailed assessments to be completed within the ecological impact assessment. | It is proposed that Forestry will not be a dedicated ES Chapter; but will be covered under Chapter 2 - Site Design and supported by Technical Appendices.<br>The ES will include an assessment of potential impacts on ancient woodland within the Ecology Chapter. However, it is not currently anticipated that there would be any direct impacts to Ancient Woodland areas from the proposed wind farm layout. |

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| Forestry Commission Scotland (FCS) | Ian Cowe | 12/05/2017 | Scoping - Forestry (continued) | <u>Design Considerations</u><br>Forest Management required for the development should be designed with consideration of the following issues:-<br>*Forestry and Woodland*<br>Reference to National Planning Policy Framework (NPPF)3, Scottish Government Policy on control of woodland removal 2009, FCS guidance on good forestry practice, sustainable forest management and environmental management.<br>*Woodland Management and Felling*<br>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. FCS would welcome pre-application discussions to ensure that all forestry issues are identified and mitigated at the earliest opportunity.<br>There is a need to consider: potential cumulative impact of proposed woodland removal. In particular the implication of felling operations on 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. | All comments are noted.<br>Further consultation with FCS on the ecology related issues raised in their response (and in relation to obtaining current FCS ranger wildlife records) is proposed. Dates for a meeting can now be progressed following the Design Freeze. |
| Forestry Commission Scotland (FCS) | Ian Cowe | 12/05/2017 | Scoping - Forestry (continued) | <u>ES</u><br>A stand-alone ES Chapter is requested to include woodland management and tree felling, describing and recognising the social, economic and environmental values of the forest and the woodland habitat.<br>This should include:<br>- baseline conditions of the forest, including its ownership, species composition, age class structure, yield class and other relevant crop information. Baseline to also include - existing records, site surveys and aerial photos.<br>- indicate proposed felling areas to accommodate new turbines, access roads | All comments from FCS are noted.<br>It is proposed that Forestry will not be a dedicated ES Chapter; but will be covered under a Technical Appendix to the ES. Information in relation to Forest Design and Design of the Wind Farm will be included within Chapter 2 - Site Design and supported by Technical Appendices. This includes information in relation to the Forest Design Plans. |

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| | | | | and other infrastructure; including details of the area to be cleared and evidence to support the proposed scale and phasing of felling.<br>- describe the changes to the forest structure, the woodland composition and describe the work programme.<br>- felling plan which clearly identifies which areas are to be felled and when.<br>- compensatory planting proposals and restocking plan.<br>- details of proposed mitigation in a Compensatory Planting Plan.<br>Prepare a Long Term Forest Plan, alongside ES that provides a strategic vision to deliver environmental benefits through sustainable forest management and describes the major forest operations over a 20 year period. This should be presented to the planning authority, as a technical appendix as part of the ES, for context.<br><u>UK Forestry Standard</u><br>This must be adhered to. | |

## 15.0 VIEWPOINTS

| VP No | Viewpoints | Approx Grid Ref (to be updated with Photo references) | VP locations 'as photographed' | Landscape Character Type (LCT) / | Visual Receptor Type | Approx. Elevation AOD | Approx. distance from Clashindarroch II (km) | Direction from nearest development area | Output / Notes |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Minor Road near Tillathrowie | 348,028,835,184 | 348025, 835188 | Agricultural Heartlands LCT | Road users; Local Residents | 269m | 2.8km | NE | Photomontage |
| 2 | Minor road near Backside | 341,127,836,123 | 341163, 836133 | Straths and Valleys LCT Aberdeenshire Deveron Valley SLA | Road users; Local Residents | 290m | 3.0km | NNW | Wireline |
| 3 | Haugh of Glass | 342,437,839,570 | 342444, 839632 | Straths and Valleys LCT Aberdeenshire Deveron Valley SLA | Local Residents | 200m | 4.5km | NW | Wireline |
| 4 | Tap O'Noth | 348407, 829302 | 348405, 829328 | Moorland Plateau LCT | Walkers | 563m | 5.5km | SE | Photomontage |
| 5 | The Buck | 341229, 823385 | 341217, 823393 | Open Uplands LCT | Walkers | 723m | 7.5km | S | Photomontage |
| 6 | Clashmach Hill | 349794, 838548 | 349774, 838496 | Moorland Plateau LCT | Walkers | 375m | 6.5km | NE | Photomontage |
| 7 | A920 between Huntly and Dufftown | 340658, 840383 | 340658, 840381 | Farmed Moorland Edge LCT | Road users | 312m | 6.8km | N | Wireline |
| 8 | Minor Road, nr Gallows Hill, Drumblade | 360095, 841251 | 360078, 841281 | Agricultural Heartlands LCT | Local Residents | 185m | 16.5km | NE | Photomontage |
| 9 | Minor Road NE of Milltown of Rothiemay | 355845, 849615 | 355835, 849580 | Upland Farmland LCT | Local Residents | 140m | 19.0km | NE | Photomontage |
| 10 | A96 between Huntly and Keith | 344694, 846105 | 344656, 846146 | Farmed Moorland Edge LCT | Road users | 229m | 12.0km | N | Wireline |

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|---|---|---|---|---|---|---|---|---|---|
| 11 | Battle Hill, Huntly | 353913, 839441 | 353839, 839482 | Straths and Valleys LCT | Walkers | 155m | 10.3km | NE | Photomontage |
| 12 | Correen Hills, Old Military Road, OS VP | 354708, 823383 | 354684, 823345 | Moorland Plateau LCT | Walkers | 380m | 13.6km | SE | Photomontage |
| 13 | Ben Rinnes | 325506, 835441 | 325514, 835449 | North Eastern Hills LCT | Walkers | 840m | 16.4km | W | Wireline |
| 14 | Knock Hill summit | 353707, 855141 | 353708, 855151 | Upland Farmland LCT | Walkers | 429m | 23.0km | NNE | Photomontage |
| 15 | Ben Aigan | 330993, 848163 | 330976, 848152 | Upland Farmland LCT | Walkers | 471m | 19.5km | NW | Wireline |
| 16 | A96 layby, near Dummuie Wind Farm | 355737, 837812 | 355731, 837816 | Agricultural Heartlands LCT | Road users | 175m | 11.5km | ENE | Photomontage |
| 17 | Summit of Oxen Craig | 366,283,822,591 | 366285, 822595 | Moorland Plateau LCT | Walkers | 528m | 24.5km | SE | Wireline |
| 18 | North of Newmill, nr Keith | 343120, 853297 | 343140, 853284 | Upland Farmland LCT | Local Residents | 210m | 19.5km | N | Wireline |
| 19 | Ladder Hills, Little Geal Charn | 329807, 819670 | 329862, 819683 | North-Eastern Hills LCT | Walkers | 742m | 15.5km | SW | Photomontage |
| 20 | Meikle Balloch | 347163, 849563 | 347159, 849554 | Upland Farmland LCT | Walkers | 365m | 16.0 km | N | Photomontage |

## 16.0 CUMULATIVE

The extent of the Cumulative Assessment is currently under discussion with consultees. This includes the extent of inclusion of smaller wind farms that may not give rise to significant effects in combination with the proposed Clashindarroch II Wind Farm. Once this exercise has been complete, it will be possible to have a better understanding of the developments that would need to be included in the detailed cumulative assessment.

## 17.0 APPENDICES

Appendix 1A, 1B – Approach to LVIA Methodology 23rd June 17

Appendix 2 – Response to Historic Environment Scotland 9th June 17

Appendix 3 – Letter to Visit Scotland 3rd July 17

**23rd June 2017**

**Clashindarroch II Wind Farm**
**Landscape and Visual Impact Assessment (LVIA) Consultation: Confirmation of Approach**

Thank you for your scoping responses. I am writing to confirm the agreed approach and actions taken or proposed with regard to specific comments received. If you have any queries or additions please let us know as soon as possible.

We have received responses from Scottish Natural Heritage (SNH), Cairngorms National Park Authority (CNPA) and Aberdeenshire Council. We are still waiting for a scoping response from Moray Council and if they respond with anything that requests a substantial change to our approach we will ensure that you are informed.

Based on the scoping responses we have set out the agreed approach below.

Wind Farm Design

We acknowledge that the relationship of the Clashindarroch II Wind Farm development with the existing Clashindarroch wind farm is a key factor and is a main focus of our design development. Clashindarroch II will be assessed in the context of the existing Clashindarroch I turbines and the proximity of the proposed development to the existing turbines will be carefully considered. Where possible, existing infrastructure will be used to minimise the potential impact of the proposed development.

We understand the choice of turbine height and blade length, as well as the number of turbines is integral to the design process which we are undertaking, particularly in terms of the relationship with the landscape and existing wind farms.

The turbine lighting will be in accordance with MOD requirements. We understand that as the turbines proposed are below 150m in height, the current lighting requirements are limited to perimeter turbines only being fitted with 25 candela omni-directional red or infrared lighting. Further details will be provided within the ES.

Methodology

We acknowledge agreement to a 40km study area.

SNH requested consideration of moderate effects as significant where they can be supported by professional judgement. We have provided a separate note to SNH in response to this matter.

Impacts on Designated Landscapes

We note CNPA's comment that they feel the wind farm would lie within the setting of the Cairngorms Natiional Park (CNP) but due to distance and presence of the existing Clashindarroch Wind Farm the view would not be significant. We also note the request that consideration of the impacts of Clashindarroch II Wind Farm on the special landscape qualities experienced in the Ladders Hills should be included. We will ensure that the LVIA will contain sufficient information and analysis to make an informed judgment on the effects on the CNP.

Landscape Impacts

We will review the potential Zone of Theoretical Visibilty (ZTV) of the final layout in considering the area for a more detailed analysis of potential landscape impacts.

We note CNP requested that both the SNH Cairngorms landscape character assessment and the more recent CNP landscape character assessment are used to define the character of the CNP.

Visual Impacts

No additional viewpoints were requested within the scoping responses. CNP clarified the position of the Ladder Hills viewpoint should be at Little Geal Charn. Through design development and further site work we have slightly adjusted some of the viewpoint locations, removed two viewpoints and added an additional one. There are now 20 viewpoints in total. The schedule below shows the changes and states whether we propose to produce a wireline or photomontage. Upon final design freeze, we will review the ZTV and make any amendments to viewpoints we consider necessary to give a greater understanding of the potential landscape and visual effects.

We note SNH's request to include modelling of access tracks, substation, borrow pits and any felling. It is likely that there will be few viewpoints where the infrastructure is visible due to the surrounding topography and forestry cover. In addition, it is proposed that keyhole felling for the turbines will be undertaken which will also limit visibility of infrastructure. We propose that upon design freeze and review of viewpoints, we will consider if there are any locations where felling and/or infrastructure would be particularly visible and would be useful to model in the photomontages.

Cumulative Impacts

We note SNH's agreement to our general approach to the cumulative assessment. We have attached two plans for your information which present the wind farm sites within a 60km radius based on the most up to date information available. Following design freeze, we will review the proposal's ZTV in relation to the ZTVs for the cumulative sites shown and refine the extent of the study area accordingly.

Residential Visual Amenity Assessment

Aberdeenshire Council requested an initial 5km radius area to consider any particularly sensitive properties but agreed to the main assessment considering properties up to and within a 2-3km radius. We will review and assess accordingly.

**CLASHINDARROCH II – LVIA PROPOSED VIEWPOINTS** **VERSION 3, 23rd JUNE 2017**

| VP No* | Viewpoints | Approx Grid Ref | Landscape Character Type (LCT) / Landscape Designation | Visual Receptor Type | Approx. Elevation (AOD) | Approx. distance from Clashindarroch II (km) | Direction from nearest development area | Output/Notes |
|---|---|---|---|---|---|---|---|---|
| 1 | Minor Road near Tillathrowie | 348028,835184 | Agricultural Heartlands LCT | Road users<br>Local Residents | 269m | 2.8km | NE | Photomontage |
| 2 | Minor road near Backside | 341127,836123 | Straths and Valleys LCT<br>Aberdeenshire Deveron Valley SLA | Road users<br>Local Residents | 290m | 3.0km | NNW | Wireline<br>(only two blade tips potentially visible with scoping layout) |
| 3 | Haugh of Glass | 342437,839570 | Straths and Valleys LCT<br>Aberdeenshire Deveron Valley SLA | Local Residents | 200m | 4.5km | NW | Wireline<br>(only two blade tips potentially visible with scoping layout) |
| 4 | Tap O'Noth | 348407, 829302 | Moorland Plateau LCT | Walkers | 563m | 5.5km | SE | Photomontage |
| 5 | The Buck | 341229, 823385 | Open Uplands LCT<br>Moray AGLV | Walkers | 723m | 7.5km | S | Photomontage |
| 6 | Clashmach Hill | 349794, 838548 | Moorland Plateau LCT | Walkers | 375m | 6.5km | NE | Photomontage |
| 7 | A920 between Huntly and Dufftown | 340658, 840383 | Farmed Moorland Edge LCT | Road users | 312m | 6.8km | N | Wireline |

| CLASHINDARROCH II – LVIA PROPOSED VIEWPOINTS | | | | | | | | VERSION 3, 23rd JUNE 2017 |
|---|---|---|---|---|---|---|---|---|
| ~~8~~ | ~~Minor Road off A941 near Bridgend~~ | ~~338099,831290~~ | ~~Open Uplands LCA Moray AGLV~~ | ~~Road users~~ | ~~300m~~ | ~~5.0km~~ | ~~WSW~~ | REMOVED due to no visibility and difficult viewpoint location |
| 8 (New) | Minor Road, nr Gallows Hill, Drumblade | 360095, 841251 | Agricultural Heartlands LCT | Local Residents | 185m | 16.5km | NE | Added as representative of settled agricultural area to the NE of site. Photomontage. |
| 9 | Minor Road NE of Milltown of Rothiemay | 355845, 849615 | Upland Farmland LCT | Local Residents | 140m | 19.0km | NE | Photomontage |
| 10 | A96 between Huntly and Keith | 344694, 846105 | Farmed Moorland Edge LCT | Road users | 229m | 12.0km | N | Wireline |
| 11 | Battle Hill, Huntly | 353913, 839441 | Straths and Valleys LCT | Walkers | 155m | 10.3km | NE | Photomontage |
| 12 | Correen Hills, Old Military Road, OS VP | 354708, 823383 | Moorland Plateau LCT | Walkers | 380m | 13.6km | SE | Photomontage |
| 13 | Ben Rinnes | 325506, 835441 | North Eastern Hills LCT Moray AGLV | Walkers | 840m | 16.4km | W | Wireline |
| ~~14~~ | ~~A96 Near Forgie~~ | ~~338700, 854450~~ | ~~Upland Farmland LCT~~ | ~~Road users~~ | ~~183m~~ | ~~22.5km~~ | ~~N~~ | REMOVED due to lack of visibility |
| 14 (16) | Knock Hill summit | 353707, 855141 | Upland Farmland LCT | Walkers | 429m | 23.0km | NNE | Photomontage |

**CLASHINDARROCH II – LVIA PROPOSED VIEWPOINTS** **VERSION 3, 23rd JUNE 2017**

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 15 (16) | Ben Aigan | 330993, 848163 | Upland Farmland LCT Moray AGLV | Walkers | 471m | 19.5km | NW | Wireline |
| 16 (17) | A96 layby, near Dummuie Wind Farm | 355737, 837812 | Agricultural Heartlands LCT | Road users | 175m | 11.5km | ENE | Photomontage |
| 17 (18) | Summit of Oxen Craig | 366283,822591 | Moorland Plateau LCT Aberdeenshire Bennachie SLA | Walkers | 528m | 24.5km | SE | Wireline |
| 18 (19) | North of Newmill, nr Keith | 343120, 853297 | Upland Farmland LCT | Local Residents | 210m | 19.5km | N | Wireline |
| 19 (20) | Ladder Hills, Little Geal Charn | 329807, 819670 | North-Eastern Hills LCT Cairngorms National Park | Walkers | 742m | 15.5km | SW | Photomontage |
| 20 (21) | Meikle Balloch | 347163, 849563 | Upland Farmland LCT | Walkers | 365m | 16.0 km | N | Photomontage |

*Numbers in brackets represent viewpoint number in scoping report.

| ID | NAME |
|---|---|
| 1 | Braco Park Farm |
| 2 | Jacobshall |
| 3 | Mains Of Melrose |
| 4 | Hallmoss Farm |
| 5 | Ley Farm |
| 6 | Cairnton Road |
| 7 | South Colleonard |
| 8 | Whitestones |
| 9 | Badentoul |
| 10 | Dounepark Farm |
| 11 | Little Blairshinnoch |
| 12 | Backhill Of Culbirnie |
| 13 | Braeside |
| 14 | Hill of Culbirnie |
| 15 | Brackenhills Farm |
| 16 | Cairnhill |
| 17 | Gawnsmoss |
| 18 | Wrae Farm |
| 19 | Cortes Gardens |
| 20 | Mains of Hatton |
| 21 | Gledsgreen |
| 22 | Auchmore Farm |
| 23 | Drodland |
| 24 | Cowie Hill |
| 25 | Myreton |
| 26 | Newton of Edingight |
| 27 | Greendykes Farm |
| 28 | Gairnieston Farm |
| 29 | Garrelhill New mill |
| 30 | West Cockmuir |
| 31 | Balnamoon |
| 32 | North Lothian |
| 33 | Clayfords Farm |
| 34 | North Redbog |
| 35 | Followsters |
| 36 | Howford Strichen |
| 37 | Culvie Hill |
| 38 | Auchtygills Farm |
| 39 | Newton Of Culvie |
| 40 | Mains Of Whitefield |
| 41 | Bogenjohn Farm |
| 42 | Ashogle Farm |
| 43 | Bogenlea Farm |
| 44 | Oldwhat Mains |
| 45 | Newstead Farm |
| 46 | Toux Farm |
| 47 | Middleton Of Rora |
| 48 | East Gowkhill |
| 49 | Old Maud |
| 50 | Towie Barclay Works |
| 51 | Gallows Hill |
| 52 | North Balnoon |
| 53 | West Crichie |
| 54 | Feithhill Farm |
| 55 | Hill of Balquhindachy |
| 56 | Mains of Hatton |
| 57 | Denmoss Largue |
| 58 | Meikle Camaloun |
| 59 | Nether Darley Farm |
| 60 | South Camaloun |
| 61 | Skelmonae |
| 62 | North Haddo |
| 63 | Blairfowl Farm |
| 64 | Newton of Begshill |
| 65 | Netherton Cottages |
| 66 | Hill Of Petty |
| 67 | Denhill |
| 68 | Hill of Burns |
| 69 | Cromlet Farm |
| 70 | Mains of Kinmuck |
| 71 | Meikle Folla |
| 72 | Baldyquash Farm |
| 73 | Mains of Meadaple |
| 74 | Crannabog Farm |
| 75 | Westerton Of Folla |
| 76 | Cowhill |
| 77 | Jericho Forest |
| 78 | Courtstone |
| 79 | Hill of Easterton |
| 80 | Hillhead |
| 81 | Mackies Of Scotland |
| 82 | Ardconnon Farm |
| 83 | Mains Of Cairnbrogie |
| 84 | Hill Of Fechel |
| 85 | Tillymaud |
| 86 | Mains Of Bogfechel |
| 87 | Mains Of Balquhain |
| 88 | Woodlands Farm |
| 89 | Cairnadailly Farm |
| 90 | Cornabo |
| 91 | Animal Protein Recycling Plant |
| 92 | Meikle Carew e |
| 93 | Cantlayhills |
| 94 | Tewel Farm |
| 95 | East Town Farm |
| 96 | Chapelton Farm |

*Grey text indicates turbines located on figure C1.2 due to height categories*

Site Boundary

60km radii from site boundary

10km/20km/40km radii from site boundary

**More than 1 turbine > 80m blade tip height**

- Operational
- Under Construction
- Consented
- In Planning
- Appealed

**1 turbine > 80m blade tip height**

- Operational
- Consented

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0 5 10 20 Km

N

Clashindarroch II Wind Farm

LVIA

**Cumulative Site Search Plan: Turbines >80m blade tip height**

**Figure C1.1**

Date: June 2017 | Prepared By: MD

Ref: CLON_C1.1_CumulativeSites_MT80m_170620md

| ID | NAME |
|---|---|
| 1 | Braco Park Farm |
| 2 | Jacobshall |
| 3 | Mains Of Melrose |
| 4 | Hallmoss Farm |
| 5 | Ley Farm |
| 6 | Cairnton Road |
| 7 | South Colleonard |
| 8 | Whitestones |
| 9 | Badentoul |
| 10 | Dounepark Farm |
| 11 | Little Blairshinnoch |
| 12 | Backhill Of Culbirnie |
| 13 | Braeside |
| 14 | Hill of Culbirnie |
| 15 | Brackenhills Farm |
| 16 | Cairnhill |
| 17 | Gawnsmoss |
| 18 | Wrae Farm |
| 19 | Cortes Gardens |
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| 35 | Followsters |
| 36 | Howford Strichen |
| 37 | Culvie Hill |
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| 39 | Newton Of Culvie |
| 40 | Mains Of Whitefield |
| 41 | Bogenjohn Farm |
| 42 | Ashogle Farm |
| 43 | Bogenlea Farm |
| 44 | Oldwhat Mains |
| 45 | Newstead Farm |
| 46 | Toux Farm |
| 47 | Middleton Of Rora |
| 48 | East Gowkhill |
| 49 | Old Maud |
| 50 | Towie Barclay Works |
| 51 | Gallows Hill |
| 52 | North Balnoon |
| 53 | West Crichie |
| 54 | Feithhill Farm |
| 55 | Hill of Balquhindachy |
| 56 | Mains of Hatton |
| 57 | Denmoss Largue |
| 58 | Meikle Camaloun |
| 59 | Nether Darley Farm |
| 60 | South Camaloun |
| 61 | Skelmonae |
| 62 | North Haddo |
| 63 | Blairfowl Farm |
| 64 | Newton of Begshill |
| 65 | Netherton Cottages |
| 66 | Hill Of Petty |
| 67 | Denhill |
| 68 | Hill of Burns |
| 69 | Cromlet Farm |
| 70 | Mains of Kinmuck |
| 71 | Meikle Folla |
| 72 | Baldyquash Farm |

| ID | NAME |
|---|---|
| 73 | Mains of Meadaple |
| 74 | Crannabog Farm |
| 75 | Westerton Of Folla |
| 76 | Cowhill |
| 77 | Jericho Forest |
| 78 | Courtstone |
| 79 | Hill of Easterton |
| 80 | Hillhead |
| 81 | Mackies Of Scotland |
| 82 | Ardconnon Farm |
| 83 | Mains Of Cairnbrogie |
| 84 | Hill Of Fechel |
| 85 | Tillymaud |
| 86 | Mains Of Bogfechel |
| 87 | Mains Of Balquhain |
| 88 | Woodlands Farm |
| 89 | Cairnadailly Farm |
| 90 | Cornabo |
| 91 | Animal Protein Recycling Plant |
| 92 | Meikle Carewe |
| 93 | Cantlayhills |
| 94 | Tewel Farm |
| 95 | East Town Farm |
| 96 | Chapelton Farm |

*Grey text indicates turbines located on figure C1.1 due to height categories*

Site Boundary

60km radii from site boundary

10km/20km/40km radii from site boundary

**More than 1 turbine 50m to 80m blade tip height**

- Operational
- Consented
- In Planning

**1 turbine 50m to 80m blade tip height**

- Operational
- Consented
- In Planning

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0 5 10 20 Km

N

Clashindarroch II Wind Farm

LVIA

**Cumulative Site Search Plan: Turbines 50m to 80m blade tip height**

**Figure C1.2**

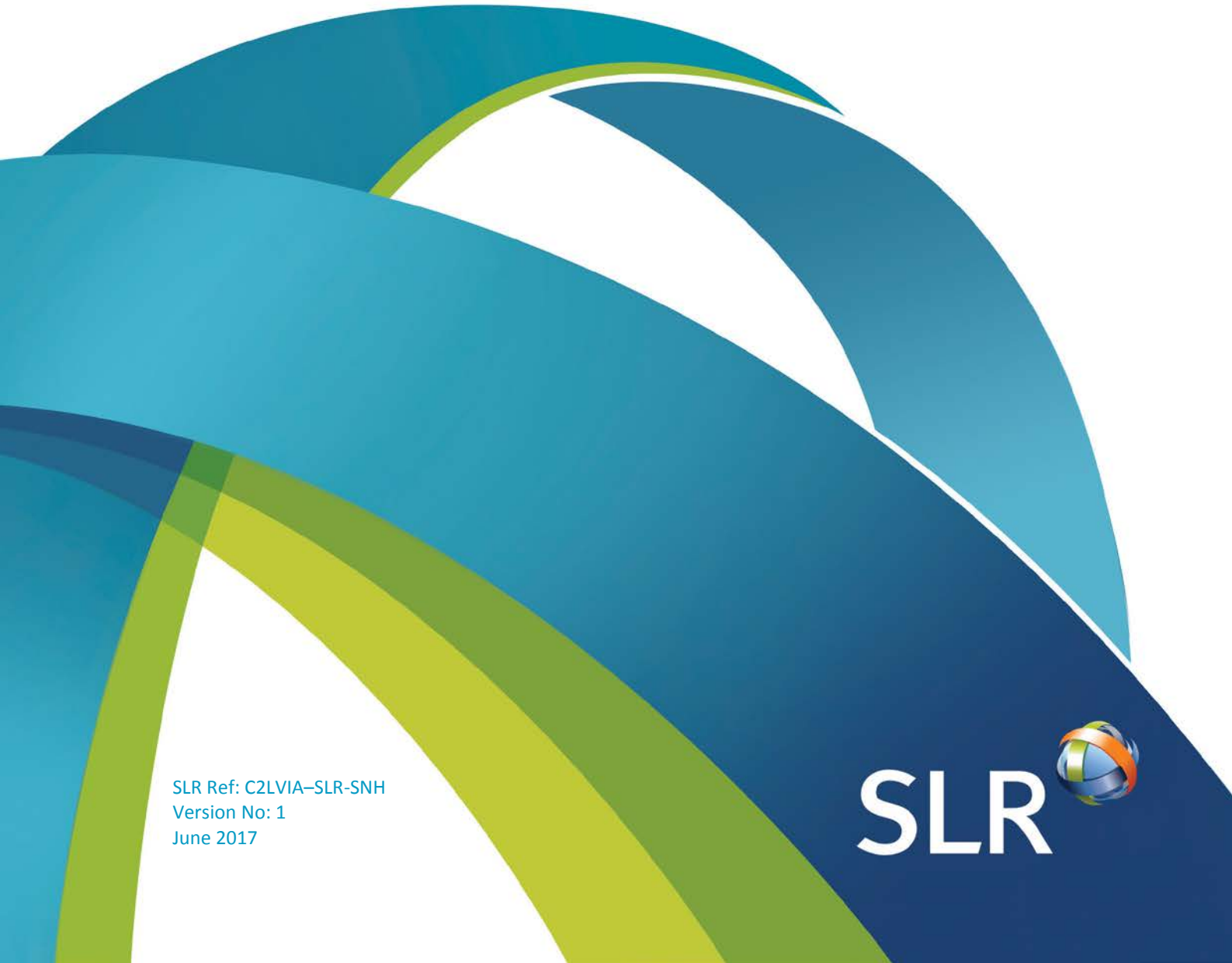
Date: June 2017 | Prepared By: MD

Ref: CLON_C1.2_CumulativeSites_LT80m_170620md

# SLR LVIA METHODOLOGY MODERATE EFFECTS

## Response to SNH Consultation

## for Clashindarroch II Wind Farm



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June 2017

# CONTENTS



# DOCUMENT REFERENCES

## ANNEX A – KEY EVALUATION CRITERIA

# 1.0 SLR METHODOLOGY AND MODERATE EFFECTS

## 1.1 Introduction

In response to consultation on the LVIA scope for Clashindarroch II Wind Farm, SNH has stated in respect of SLR's proposed Methodology, that *"moderate effects should also be considered as significant where they can be supported by professional judgement."* SNH note that their recommendation is based on *"extensive experience of dealing with and advising on effects from this type of large scale vertical development."* SNH continue stating that *"This more flexible approach to assessment of significance is being adopted by a substantial proportion of the landscape profession who have experience of this type of work".*

## 1.2 SLR's LVIA Methodology

SLR's LVIA methodology, as set out in the Scoping Report, states *"Landscape and visual effects will be assessed as major, major / moderate, moderate, moderate / minor, minor and negligible with effects identified as major or major / moderate being considered significant effects in terms of the EIA Regulations 2011."* The summary methodology provided in the Scoping Report does not set out the evaluation criteria used to assess levels of value, susceptibility, sensitivity or magnitude of change.

In our view, the identification of significant effects has to be related to the evaluation criteria used to assess each of the relevant matters considered in the assessment process: i.e. value, susceptibility and sensitivity of receptor as well as magnitude of change. It is the application of the evaluation criteria associated with assessment of each of these components that results in the level of effect identified for any receptor, rather than the labelling of 'moderate' or any other term.

GLVIA 3 states that *"the Regulations required that a final judgement is made about whether or not each effect is likely to be significant. There are no hard and fast rules about what effects should be deemed 'significant' but LVIAs should always distinguish clearly between what are considered to be the significant and non-significant effects."*

As indicated in SNH's response and made clear in GLVIA 3, what is important is that professional judgement is applied throughout the evaluation and assessment process and there should be clarity about what is deemed significant and what is not supported by reasoning.

Our methodology would acknowledge that where, for example, several moderate effects occur for the same receptor, e.g. a sequential route within the study area, the overall effect on that receptor may be assessed as significant.

At the end of this note, Annex A sets out our key evaluation criteria for assessment of the main components of the methodology.

## 1.3 Size of the Proposed Development

In SLR's view the size of the development should not determine the methodology. A robust methodology should be appropriate for all scales of development and the magnitude of change parameter is where the size of the development would be assessed which should then be carried forward in that context to whether or not the impacts and effects are significant.

## 1.4 SLR's Experience

SLR's LVIA methodology is regularly reviewed and updated in relation to current guidance as well as feedback from consultees. Carys Swanwick, Fellow of the Landscape Institute and editor of GLVIA 3 (2013) is retained as

an Advisor to SLR specifically in respect of LVIA methodology and related matters, as well as providing advice on specific assessment work.

Our LVIA methodology has been through scrutiny at numerous public inquiries, both pre- and post- GLVIA 3. In respect of wind farm LVIAs, SLR's Landscape Team has carried out assessments for over 100 wind farms in the UK of which approximately 60 have been in Scotland. SNH has very rarely queried our assessment methodology or identification of significant effects and if/when this has occurred, it has been in respect of individual viewpoint assessments rather than being an overall comment on under assessment of significant effects. Our lead Landscape Architects regularly present evidence at public inquiries and our methodology is rarely queried. We do not therefore understand the grounds for the query in respect of our methodology, or our experience in respect of LVIA generally and wind farm assessment in particular.

## 1.5 Conclusion

We trust that this provides SNH with reassurance that our threshold for assessing significant effects is not determined by either application of a matrix or a label, such as 'moderate'. Significant effects are assessed through the application of a series of evaluation criteria in respect of sensitivity and magnitude of change parameters. We completely concur that in line with GLVIA 3, the assessment of whether and where the effects of any development are likely to be significant must entail the application of professional judgement. SLR has considerable and extensive experience of applying this professional judgement. We have an experienced team of Chartered Landscape Architects who complete our LVIAs which are all technically reviewed prior to issue. Our LVIAs are rarely questioned in terms of methodology or the identification of significant effects.

# ANNEX A

# KEY EVALUATION CRITERIA

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# CONTENTS

# 1.0 Annex A

This annex sets out the key evaluation criteria that SLR uses to determine the magnitude of effect upon landscape and visual receptors.

## 1.1 Landscape

### 1.1.1 Landscape Sensitivity

Landscape sensitivity is established by assessing both the **value** attached to the landscape and the **susceptibility** of that landscape receptor to the particular form of change likely to result from the Project. **Tables 1, 2,** and **3** describe the relevant categories and criteria used.

**Table 1: Value Attached to Landscapes**

| Designation/Status | Description | Value |
|---|---|---|
| National Parks, NSAs, Heritage Coasts | Areas of landscape identified as being of national importance for their natural beauty (and in the case of National Parks the opportunities they offer for outdoor recreation). Consideration should be given to their settings especially where these contribute to the special qualities for which the landscape is valued. | National |
| Inventory listed gardens and designed landscapes | Gardens and designed landscapes included on Historic Scotland's Inventory | National |
| Local Landscape Designations where still included in local planning documents or notified as important features. | Special Landscape Areas or other locally designated landscapes identified by local authorities as having importance or specific landscape features noted as having value. | Local Authority |
| Undesignated landscapes of community value | Landscapes which do not have any formal designation but which are assessed as having value to local communities. | Community |
| Degraded landscapes | Landscapes in poor condition or fundamentally altered by presence of intrusive man-made structures. Landscapes with no particular scenic qualities or natural or historic environment interest. | Low |

**Table 2: Susceptibility of Landscape Receptor to Change**

| Susceptibility | Criteria |
|---|---|
| High | The landscape receptor is highly susceptible to the Project because the relevant characteristics of the landscape have no or very limited ability to accommodate certain aspects of the Project without undue adverse effects or fundamentally altering landscape character. |
| Medium | The landscape receptor is moderately susceptible to the Project because the relevant characteristics of the landscape have some ability to accommodate certain aspects of the Project without undue adverse effects or with some but limited alteration to landscape character. |
| Low | The landscape receptor has low susceptibility to the Project because the relevant characteristics of the landscape are generally able to accommodate aspects of the Project without undue adverse effects and very little alteration to landscape character. |

**Table 3: Sensitivity of Landscape Receptors**

| Sensitivity | Criteria |
|---|---|
| High | The landscape receptor is of national value and is considered to have high susceptibility to the effects of the Project<br>OR<br>The landscape receptor is of national value and is considered to have medium susceptibility to the effects of the Project |
| Medium | The landscape receptor is of national value and is considered to have low susceptibility to the effects of the Project<br>OR<br>The landscape receptor is of local authority value and is considered to have high susceptibility to the effects of the Project<br>OR<br>The landscape receptor is of community value and is considered to have high susceptibility to the effects of the Project<br>OR<br>The landscape receptor is of local authority value and is considered to have medium susceptibility to the effects of the Project |
| Low | The landscape receptor is of local authority value and is |

| Sensitivity | Criteria |
|---|---|
| | considered to have low susceptibility to the effects of the Project<br><br>OR<br><br>The landscape receptor is of community value and is considered to have medium susceptibility to the effects of the Project<br><br>OR<br><br>The landscape receptor is of community value and is considered to have low susceptibility to the effects of the Project |

### 1.1.2 Magnitude of Change

#### Size and Scale

The size and scale of change in the landscape is mainly a reflection of the extent/proportion of landscape elements/components lost or added and/or the degree to which aesthetic/perceptual aspects are altered, both of which may result in erosion or enhancement of landscape character. The receptors identified may be individual elements or overall landscape character.

The criteria that are being used to assess the size and scale of landscape change are based upon the amount of change likely to occur as a result of the proposals, and can be large, medium, small or negligible/no change as described in **Table 4**. Changes could be either adverse or beneficial in nature. As a theoretical example, construction might remove a substantial proportion of stone walls in a landscape character area where they are identified as one of the key characteristics, so this might be classified as a 'large level of landscape change'. Similarly the introduction of a wind turbine as a new element in a landscape character area where one of the key characteristics is a sense of openness and uninterrupted extensive views without the presence of existing wind turbines might also be classified as a large level of landscape change. As with susceptibility, where size/scale of the effect is judged to lie between levels, an intermediate assessment of large/medium or medium/small is adopted.

**Table 4: Size/Scale of Landscape Changes**

| Category | Description |
|---|---|
| Large level of landscape change | There would be a large level of change in landscape character, and especially to the key characteristics if, for example, the Project:<br>• becomes a dominant feature in the landscape, changing the balance of landscape characteristics and/or<br>• dominates important visual connections with other landscape types, where this is a key characteristic of the area. |
| Medium level of landscape change | There would be a medium level of change in landscape character, and especially to the key characteristics if, for example, where: |

| Category | Description |
|---|---|
| | • The Project would be more prominent but would not change the overall balance or composition of the landscape and/or<br>• Key views to other landscape types may be interrupted intermittently by the Project, but these views would not be dominated by them. |
| Small level of landscape change | There would be a small level of change in landscape character, and especially to the key characteristics if, for example, where:<br>• There would be no introduction of new elements into the landscape and the Project would not significantly change the composition/balance of the landscape. |
| No or negligible landscape change | There would be no, or a negligible level of change in landscape character, and especially to the key characteristics if, for example, where the Project component would be a small element and/or would be a considerable distance from the receptor. |

### Geographical Extent

The geographical extent of an impact is assessed by determining the area over which the change will influence the landscape. This may be at the site level, in the immediate setting of the site or over some or all of the receptor affected. Where the landscape receptors are landscape character areas, the judgement is based on the extent and proportion of the area that is affected. Where there are individual elements of the landscape, such as trees, woods or hedgerows, which might for example be affected by construction activities, the area over which they are affected will most often be at the local level of the site and its setting. The categories used are provided in **Table 5**.

**Table 5: Geographical Extent of Landscape Changes**

| Category | Description |
|---|---|
| Large extent of landscape change | The change will affect all of the landscape receptor under consideration. |
| Medium extent of landscape change | The change will affect a medium extent of the landscape receptor under consideration. |
| Small extent of landscape change | The change will affect a small part of the landscape receptor under consideration. |
| Negligible extent of landscape change | The change will affect only a negligible part of the landscape receptor under consideration. |

### Duration and Reversibility

The categories used when assessing the duration of change are set out in **Table 6**.

**Table 6: Duration and Reversibility of Landscape Changes**

| Category | Description |
|---|---|
| Permanent/<br>Irreversible | Change that will last for 25 years or more is deemed permanent or irreversible. |
| Long-term reversible | Change that is theoretically reversible but will endure for more than 10 years (but less than 25 years). |
| Medium-term reversible | Change that is wholly or partially reversible but will endure between 2 and 10 years. |
| Short-term reversible | Change that is reversible but will endure from 0 to 2 years is deemed temporary. This includes certain construction effects. |

### Determining Overall Magnitude of Landscape Change

The relationships between the three factors that contribute to the assessment of the magnitude of change are not formulaic and only indicate general categories of magnitude as shown in **Table 7**. Professional judgement is applied in determining an appropriate category.

**Table 7: Magnitude of Landscape Changes**

| Magnitude | Criteria |
|---|---|
| Substantial | Large level of change affecting all of the landscape receptor under consideration, which will last for more than 10 years/permanent. |
| Medium | Medium level of change affecting a medium extent of the landscape receptor under consideration and which will last for 2 to 10 years. |
| Slight | Small level of change affecting a small part of the landscape receptor under consideration and which will be of short duration, lasting up to 2 years. |
| Negligible | Negligible level of change which will affect a negligible part of the landscape receptor under consideration. |

## 1.2 Visual

### 1.2.1 Visual Sensitivity

Visual sensitivity is established by assessing both the **value** attached to the views experienced and the **susceptibility** of visual receptors to the particular form of change likely to result from the Project.

### Value attached to views experienced by visual receptors

Different levels of value are attached to the views experienced by particular groups of people at particular locations illustrated by representative or, in some cases, specific viewpoints. Assessment of value takes account of a number of factors, including:

- Recognition of the view through some form of planning designation or, for example, by its association with particular heritage assets, or designated landscapes which people visit specifically for recreation and enjoyment;
- The popularity of the viewpoint, in part denoted by its appearance in guidebooks, literature or art, or on tourist maps, by information from stakeholders and by the evidence of use including facilities provided for its enjoyment; and
- Other evidence of the value attached to views by people, including consultation with local planning authorities and professional assessment of the quality of views.

The value of publicly accessible views is assessed as high, medium or low guided by the criteria shown in **Table 8** and the criteria included above. These criteria are provided for guidance only and are not intended to be exhaustive.

**Table 8: Value Attached to Publicly Accessible Views**

| Value | Criteria |
|---|---|
| High | Views from nationally (and in some cases internationally) known viewpoints, which:<br>• have some form of planning designation;<br>• are associated with internationally or nationally designated landscapes or important heritage assets;<br>• are promoted in sources such as maps and tourist literature;<br>• are linked with important and popular visitor attractions where the view forms a recognised part of the visitor experience; or<br>• have important cultural associations. |
| Medium | Views from viewpoints of some importance at regional or local levels, which:<br>• have some form of local planning designation associated with locally designated landscapes or areas of equivalent landscape quality;<br>• are promoted in local sources;<br>• are linked with locally important and popular visitor attractions where the view forms a recognised part of the visitor experience; or<br>• have important local cultural associations. |
| Low | Views from viewpoints which, although they may have value to local people:<br>• have no formal planning status; |

| Value | Criteria |
|---|---|
| | • are not associated with designated or otherwise high quality landscapes;<br>• are not linked with popular visitor attractions; or<br>• have no known cultural associations. |

### Susceptibility of Visual Receptors to Change

The susceptibility of different visual receptors to changes in their views is mainly a function of:

- The occupation or activity of the receptor at a given viewpoint; and
- The extent to which the receptor's attention or interest may be focused on a particular view and the visual amenity experienced.

**Table 8** sets out the susceptibility and corresponding receptor type.

**Table 9: Susceptibility of Visual Receptors to Change**

| Susceptibility | Type of Receptor |
|---|---|
| High | • Residents;<br>• People engaged in outdoor recreation where their attention is likely to be focused on the landscape and on particular views;<br>• Visitors to heritage assets, other attractions or open spaces where views of the surroundings are an important part of the experience;<br>• Communities where views contribute to the landscape setting enjoyed by residents. |
| Medium | • Road users on scenic routes where the attention of drivers and passengers is likely to be focused on the landscape and on particular views;<br>• People engaged in outdoor sport or recreation, which may involve appreciation of views e.g. users of golf courses. |
| Low | • People engaged in outdoor sport or recreation, which does not involve appreciation of views;<br>• People at their place of work where the setting is not important to the quality of working life;<br>• Road users where the view is incidental to the journey. |

### Resulting Sensitivity of Visual Receptors Groups

**Table 10** describes the resulting visual sensitivity when considering the value and susceptibility as defined above.

**Table 10: Sensitivity of Visual Receptors Groups**

| Sensitivity | Criteria |
|---|---|
| High | The visual receptor group is highly susceptible to changes in views and visual amenity and relevant views are of high value;<br>OR<br>The visual receptor group has a medium level of susceptibility to changes in views and visual amenity and relevant views are of high value. |
| Medium | The visual receptor group is highly susceptible to changes in views and visual amenity and relevant views are of value at the medium level;<br>OR<br>The visual receptor group has a medium level of susceptibility to changes in views and visual amenity and relevant views are of value at the medium level. |
| Low | The visual receptor group has a medium level of susceptibility to changes in views and visual amenity and relevant views are of value at the low level;<br>OR<br>The visual receptor group has a low level of susceptibility to changes in views and visual amenity and relevant views are of value at the low level. |

### 1.2.2 Magnitude of Change

The assessment of the magnitude of change considers the size or scale, the geographical extent and the duration and reversibility of the visual change. **Tables 11, 12,** and **13** describe the relevant categories and criteria used.

**Table 11: Size/Scale of Visual Change**

| Category | Criteria |
|---|---|
| Large level of visual change | The proposals would cause a complete or very large change in the view, resulting from the loss of important features or the addition of significant new ones, to the extent that this would substantially alter the composition of the view and the visual amenity it offers. |
| Medium level of visual change | The proposals would cause a clearly noticeable change in the view, resulting from the loss of features or the addition of new ones, to the extent that this would alter to a moderate degree the composition of the view and the visual amenity it offers. |
| Small level of visual change | The proposals would cause a perceptible change in the view, resulting from the loss of features or the addition of new ones, to the extent that this would partially alter the composition of |

| Category | Criteria |
|---|---|
| | the view and the visual amenity it offers. |
| No or negligible visual change | The proposals would cause a barely perceptible or no change in the view, resulting from the loss of features or the addition of new ones, to the extent that this would barely alter the composition of the view and the visual amenity it offers. |

**Table 12: Geographical Extent of Visual Change**

| Category | Criteria |
|---|---|
| Large extent | The proposal is seen by the group of receptors in many locations across the Study Area or from the majority of a linear route and/or by large numbers of viewers; or at a specific viewpoint or location the view is available from all or most of the site; or the effect on the specific view is extensive. |
| Medium extent | The proposal is seen by the group of receptors from a medium number of locations across the Study Area or from a medium part of a linear route and/or by a medium number of viewers; or at a specific viewpoint or location the view is available from a medium proportion of the site; or the effect on the specific view is moderately extensive. |
| Small extent | The proposal is seen by the group of receptors at a small number of locations across the Study Area or from only limited sections of a linear route and/or by a small number of viewers; or at a specific viewpoint or location the view is available from only a small proportion of the site or the effect on the specific view is small. |
| Negligible extent | The proposal is either not visible in the Study Area or is seen by the receptor group at only one or two locations or from a very limited section of a linear route and/or by only a very small number of receptors; or at a specific viewpoint or location the view is available from hardly any of the site; or the effect on the specific view is barely discernible. |

**Table 13: Duration and Reversibility of Visual Change**

| Category | Criteria |
|---|---|
| Permanent/ irreversible | Change that will last for 25 years or more is deemed permanent or irreversible. |
| Long-term reversible | Change that is theoretically reversible but will endure for more than 10 years (but less than 25 years). |

| Category | Criteria |
|---|---|
| Medium-term reversible | Change that is wholly or partially reversible and will endure between 2 and 10 years. |
| Short-term reversible | Change that is reversible but will endure from 0 to 2 years is deemed temporary. This includes certain construction effects. |

### Determining Overall Magnitude of Visual Change

The relationships between the three factors described above that contribute to the assessment of the magnitude of change are not formulaic and only indicate general categories of magnitude as shown in **Table 14**. Professional judgement is applied in determining an appropriate category.

**Table 14: Magnitude of Visual Change**

| Magnitude | Criteria |
|---|---|
| Substantial | Large level of change with a large geographical extent which will last for more than 10 years; |
| Medium | Medium level of change with a medium scale of geographical extent which will last for 2 to 10 years; |
| Slight | Small level of change with a small geographical extent which will be of short duration, lasting up to 2 years; |
| Negligible | Negligible level of change with a negligible geographical extent which will last for up to 2 years; |

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Via email – dated 9th June 2017

Dear Alison Baisden

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

Thank you for your letter of 18th May 2017 responding to the scoping report submitted for the Clashindarroch II Wind Farm.

The following constitutes our response to your letter.

EIA is focussed on identifying and assessing potential significant effects on given receptors, in this case designated heritage assets. It is our experience that significant effects on the setting of heritage assets are generally restricted to the area within 5 km of the wind turbines. We do, however, acknowledge that there may be circumstances where significant effects occur on the setting of heritage assets at a distance beyond 5km. This tends to be the case where long distance views may form a part of the original function of the asset, such as potentially hill forts or landscape gardens. We will therefore review designated assets further than 5km and may assess a selection of these if there is reason to think these are of a type that is likely to be particularly sensitive to long distance setting change impacts. This will be undertaken through ZTV analysis and preliminary wireframe visualisations. We will include in this consideration the two heritage assets named in your letter that are further than 5km from the proposed turbine locations, i.e. Gallows Hill Cairn (Index Number 11576) and Auchindoun Castle (Index Number 90024); the latter is well outside of the current ZTV. A site visit would be undertaken as part of the assessment process in the case of Gallows Hill and from Auchindoun if there is predicted visibility.

ZTV analysis will be undertaken using the standard guidelines issued by SNH, *Visual Representations of Windfarms Guidance* February 2017. In accordance with this, and following longstanding accepted practice, the underlying ZTV analysis will be based on a Digital Terrain Model (DTM), giving a 'bare earth' assessment of visibility, as has been the ZTV issued as part of the scoping report. Potential screening by forestry, buildings etc. is therefore not incorporated into the ZTV, which thus tends to overstate visibility. As the design of the wind farm evolves the ZTV may also change. Any change of ZTV will be examined to ensure the appropriate level of assessment is undertaken in accordance with policy and taking due consideration of your letter.

With respect to the other heritage assets specified in your letter, Beldorny Castle (LB9164) is outside of the ZTV, though the level of appropriate assessment would be revisited in the event of a change of ZTV bringing the castle into visibility with the proposed wind farm.

At Wormy Hillock Henge (Index Number 3278), we do not intend to use a photomontage as a means of assessment as the site is surrounded by plantation woodland. A wireline visualisation would use a bare earth DTM allowing the assessment of visual impact on setting, thus taking into account the potentially temporary and changeable nature of the screening provided by the plantation forestry. A site visit would be undertaken as part of the assessment process.

At Tap O' Noth (Index No. 63) wireline and photomontage visualisations will be undertaken from within the fort will be used as part of the cultural heritage assessment of the potential impact on the setting of the turbines. Consideration of the current ZTV of the proposed wind farm demonstrates that the potential locations for views of the wind farm as a back drop to Tap O' Noth are very few, and are generally approximately 9-10 km from the proposed turbine locations, and 4 -5 km from Tap

O' Noth.  We therefore consider this request disproportionate to the probability of significant impact. A site visit would be undertaken as part of the assessment process.

We think that this is a reasonable basis on which to proceed with assessment. Please contact either myself, or the Project Manager, Alison Sidgwick at Asidgwick@slrconsulting.com should you wish to discuss this email any further.

Yours sincerely

Dr Steve Lancaster ACIfA, FSA(Scot)

Douglas Keith
Visit Scotland
Government and Parliamentary Affairs
Ocean Point One
94 Ocean Drive
Edinburgh EH6 6JH

3 July 2017

Dear Mr Keith

**Clashindarroch Wind Farm II, Aberdeenshire**

We have been forwarded a copy of your response to Scottish Government dated 25 April 2017 following their request for comments on the proposed wind farm known as Clashindarroch II.

In developing this proposal, our client Vattenfall Wind Power Limited (Vattenfall) is concerned to ensure that issues regarding potential effects on the area's tourism economy are fully assessed and addressed. SLR Consulting (SLR) is undertaking this assessment on Vattenfall's behalf as part of the socio-economic assessment.

SLR is experienced in undertaking such assessments for various clients for large scale wind farm developments in Scotland, and where possible seeks to agree the scope of the assessment in advance with key stakeholders. In response to your comments, therefore, we would propose that the following forms the basis for the assessment of effects on tourism, and would very much welcome any further comments you may wish to make.

**Study Area**: For the assessment of effects on tourism, recreation and land use receptors, the study area would primarily focus on an area within 5km of the site, but would take account of high sensitivity receptors such as Cairngorms National Park beyond 5km.

**Baseline Information**: This sets the context for the development and the assessment of its likely effects. The baseline would draw on published information such as the 2015 Scotland Visitor Survey and information published by other bodies such as Cycling Scotland, British Horse Society, Scotways, British Nordic UK, Scottish Association for Country Sport. We will also refer to national, regional and local planning and economic policy relating to tourism.

**Assessment of effects**: The assessment will draw on the findings of published studies that examine whether there is a link between the development of windfarms and changes in patterns of tourism spend and behaviour. One of the most recent studies (undertaken since a number of large wind farms have been constructed) is the BiGGAR Economics report published in July 2016: *Wind Farms and Tourism Trends in Scotland.* The study examines effects at both national and local levels. Overall, the conclusion of this study is that 'published national statistics on employment in sustainable tourism demonstrates that there is no relationship between the development of onshore wind farms and tourism employment at the level of the Scottish economy, at local authority level nor in the areas immediately surrounding wind farm development'. Notwithstanding the findings of the BiGGAR study, SLR will examine the potential for local effects to arise at both construction and operational stage, including effects on specific local receptors such as recreational facilities and accommodation businesses.

**Significance of the effects**: This will be established through combining the magnitude of the impact and the sensitivity of the receptor. Criteria for establishing sensitivity and magnitude are set out in Annex 1 to this letter.

We note from your letter that you have expressed a desire for the following issues (in italics) to be addressed:

- *The number of tourists travelling past en route elsewhere* – potential effects on travellers will be assessed where specific tourist routes can be identified;
- *The views from accommodation in the area* – effects on accommodation providers and other tourism receptors that are sensitive to visual impact within the study will be assessed based on findings from the assessment of visual effects that are presented as a separate report in the Environmental Statement;
- *The relative scale of tourism impact i.e. local and national* – the scale of the tourism economy will be set out in the baseline, and likely effects will be addressed qualitatively in the assessment; it should be noted that such effects are most likely to be experienced at local level;
- *The potential positives associated with the development* – we will seek to address this in relation to common supply chain businesses, including accommodation businesses; and
- *The views of tourist organisations, i.e. local tourist businesses or Visit Scotland* – we would welcome your comments on any other organisations we should approach.

I trust that the above description of our proposed approach to the Clashindarroch proposal meets with your approval. We would of course be pleased to receive any comments you wish to make on the proposed approach, which we will aim to incorporate as far as practicable into our assessment.

I look forward to hearing from you.

Yours sincerely

**Anne Dugdale**

Principal Planner
SLR Consulting Ltd

## Annex 1

## Sensitivity criteria, magnitude and significance thresholds

The following parameters will be considered within the assessment in line with the EIA Regulations:

- beneficial or adverse (or neutral);
- extent (the area over which the effect occurs);
- duration (the time for which the effect is expected to last prior to recovery or replacement of the resource or feature);
- reversibility (permanent or temporary); and
- timing and frequency.

Sensitivity criteria

There are no published standards that define receptor sensitivity relating to socio-economic assessment. As a general rule the sensitivity of each receptor or receptor group will be based on its importance or scale and the ability of the baseline to absorb or be influenced by the identified effects. In assigning receptor sensitivity, consideration will be given to the following:

- importance of the receptor e.g. local, regional, national, international;
- availability of comparable alternatives;
- ease at which the resource could be replaced;
- capacity of the resource to recover or adapt to identified impacts over a period of time; and
- level of usage and nature of users (e.g. sensitive groups such as people with disabilities).

Based upon professional judgement, it is proposed that four levels of sensitivity are used: High; Medium, Low and Negligible. Proposed sensitivity criteria are set out in Table 1.

**Table 1: Proposed Sensitivity Criteria**

| Criteria | Description |
|---|---|
| **High** | The receptor:<br>• has little or no capacity to absorb change without fundamentally altering its present character; or<br>• is of high socio-economic, tourism, recreation or land use value[1]; or<br>• is of national or international importance; or<br>• is accorded a high priority in policy; and<br>• there are no alternatives with available capacity within its catchment area. |
| **Medium** | The receptor:<br>• has moderate capacity to absorb change without fundamentally altering its present character; or<br>• has a moderate socio-economic, tourism, recreation or land use value; or<br>• is of regional importance; and |

[1] Which may include being of high value to a user group of high sensitivity (e.g. mobility impaired users)

| Criteria | Description |
|---|---|
| | • is accorded a moderate priority in policy; and<br>• there are some alternatives with available capacity within its catchment area. |
| **Low** | The receptor:<br>• is tolerant of change without detriment to its character; or<br>• is of low socio-economic, tourism, recreation or land use; or<br>• is of local importance;<br>• is accorded a low priority in policy; and<br>• there is a choice of alternatives with available capacity within its catchment area. |
| **Negligible** | The receptor is resistant to change and is of low socio-economic, tourism, recreation or land use value or there is a wide choice of alternatives with available capacity within its catchment area. |

Magnitude criteria

The proposed assessment criteria are based on professional judgement and experience from assessment of similar projects and are set out in Table 2.

**Table 2: Magnitude of Impact**

| Receptor Group | High | Medium | Low | Negligible |
|---|---|---|---|---|
| **Business Supply Chain** | An impact that would dominate over the baseline business population conditions and/or would affect a large proportion of business establishments. | An impact that would be expected to result in a moderate change to baseline business population conditions and/or would affect a moderate proportion of business establishments. | An impact that would be expected to result in a perceptible difference from baseline business population conditions and/or would affect a small proportion of business establishments. | An impact that would not be expected to result in a measurable variation from baseline business population conditions. |
| **Local Labour Market** | An impact that would dominate over baseline local labour market conditions and/or would affect a large proportion of the existing resident workforce. | An impact that would be expected to result in a moderate change to baseline local labour market conditions and/or would affect a moderate proportion of the existing resident workforce. | An impact that would be expected to result in a perceptible difference from baseline local labour market conditions and/or would affect a moderate proportion of the existing resident workforce. | An impact that would not be expected to result in a measurable variation from baseline local labour market conditions. |
| **Tourism and Visitor Economy** | An impact that would dominate over baseline tourism and visitor economy conditions. | An impact that would be expected to result in a moderate change to baseline tourism and visitor economy | An impact that would be expected to result in a perceptible difference to baseline tourism and visitor | An impact that would not be expected to result in a measurable variation from baseline |

| Receptor Group | High | Medium | Low | Negligible |
|---|---|---|---|---|
| | | conditions. | economy conditions | tourism and visitor economy conditions |
| **Tourism and Recreation Assets** | An impact that would be expected to cause a major restriction of access to or availability of tourism and visitor assets in the LIA or would result in a major change to existing patterns of use. | An impact that would be expected to have a moderate restriction of access to or availability of tourism and visitor assets in the LIA or would result in a moderate change to existing patterns of use. | An impact that would be expected to have a small restriction of access to or availability of tourism and visitor assets in the LIA or would result in a small change to existing patterns of use. | An impact that would be unlikely to result in a noticeable difference to tourism and visitor assets in the LIA. |
| **Land Use** | An impact that would lead to a major restriction on the operation of a receptor, e.g. a farm business, or complete closure of receptor. | An impact that would lead to a moderate to major restriction on the operation of the receptor. | An impact that would lead to a minor restriction on the operation of the receptor. | An impact that would lead to a negligible restriction on the use of the receptor. |

Defining 'significant effects'

The level of effect of an impact on socio-economic, tourism, recreational and land use receptors will initially be assessed by combining the magnitude of the impact and the sensitivity of the receptor. The level of effects presented in Table 3 provides a guide to decision making.

**Table 3: Level of Effect Matrix**

| **Level of Effects Matrix** | | | | |
|---|---|---|---|---|
| **Sensitivity or Value of Resource or Receptor** | **Magnitude of Impact** | | | |
| | High | Medium | Low | Negligible |
| High | Major | Major | Moderate | Minor |
| Medium | Major | Moderate | Minor | Negligible |
| Low | Moderate | Minor | Negligible | Negligible |
| Negligible | Minor | Negligible | Negligible | Negligible |

Defining significant effects

Where an effect is classified as **Major**, this is considered to represent a 'significant effect' in terms of the EIA Regulations. Where an effect is classified as **Moderate** , this may be considered to represent a 'significant effect' but should always be subject to professional

judgement and interpretation, particularly where the sensitivity or impact magnitude levels are not clear or are borderline between categories or the impact is intermittent.

The Level of Effects Matrix shown in Table 3 therefore provides a guide to decision making, but is not a substitute for professional judgment. Impacts and effects can be beneficial, neutral or adverse and these would be specified where applicable. It should be noted that significant effects need not be unacceptable or irreversible.