



Aultmore Wind Farm Redesign

Volume 1 - Non-Technical Summary

Vattenfall Wind Power Ltd

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Acronyms and Abbreviations

ATMP	Abnormal Indivisible Load Transport Management Plan
ACAS	Aberdeenshire Council Archaeology Service
AIL	Abnormal Indivisible Load
BESS	Battery Energy Storage System
BERP	Biodiversity Enhancement and Restoration Plan
CAA	Civil Aviation Authority
СЕМР	Construction Environment Management Plan
CO ²	Carbon Dioxide
СТМР	Construction Traffic Management Plan
DECC	Department for Energy and Climate Change
DfT	Department for Transport
EnvCoW	Environmental Clerk of Works
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
FLS	Forestry and Land Scotland
GIS	Geographic Information System
GWh	Gigawatt hours
HER	Historic Environment Record
HES	Historic Environment Scotland
HRA	Habitat Regulations Assessment
IOA	Institute of Acoustics
JRC	Joint Radio Company
LSE	Likely Significant Effects
LCT	Landscape Character Type
LVIA	Landscape and Visual Impact Assessment
MC	Moray Council
MOD	Ministry of Defence
MW	Megawatts
NRTF	National Road Traffic Forecast
NTS	Non-Technical Summary
PAR	Precision Approach Radar
PSR	Primary Surveillance Radar
RAF	Royal Air Force
SAC	Special Area of Conservation
SEPA	Scottish Environmental Protection Agency



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SPA	Special Protection Area
UHF	Ultra-High Frequency
UK	United Kingdom



1.0 Introduction

1.1 Overview

This Non-Technical Summary (NTS) forms part of the Environmental Impact Assessment (EIA) Report that has been prepared to accompany an application for consent under Section 36 of the Electricity Act 1989 to construct and operate Aultmore Wind Farm Redesign (hereafter referred to as the proposed development).

The EIA Report presents the findings of the EIA which aims to identify potentially significant environmental effects from the proposed development and where possible proposes suitable mitigation measures to address or minimise such effects. This NTS summarise the findings of the EIA Report in non-technical language.

1.2 The Applicant

Vattenfall Wind Power Limited (the Applicant) is one of Europe's largest producers and retailers of electricity and heat. The Vattenfall group has approximately 20,000 employees, and their main markets are the UK, Sweden, Germany, the Netherlands and Denmark. Vattenfall have operated in the UK since 2008 and have been a key partner in enabling the UK to reach net zero. The parent company of Vattenfall Wind Power Ltd is Vattenfall AB, which is 100% owned by the Swedish State with headquarters based in Solna, Sweden.

Formed in 1909, Vattenfall is said to have been the world's first state-owned power producer, and in the following 100 years have electrified industries, supplied energy to people's homes and modernised their way of living through innovation and cooperation. Vattenfall is determined to make fossil-free living possible within one generation and is driving the transition to a more sustainable energy system through growth in renewable production and climate smart energy solutions for its customers.

Vattenfall currently operates 10 wind farms in the UK, five onshore, and five offshore, with a total generating capacity of 1,069MW which generate enough electricity to power approximately 850,000 homes. Vattenfall also have numerous projects in their pipeline, ranging from proposals to projects currently under construction, that could power more than 4 million UK homes. Vattenfall is on track to help save 8 million tonnes of CO_2 a year by 2030, the same as taking 4 million cars off the road and continues to grow in district heating and power networks to enable the fossil freedom that drives society forward.

Further information on Vattenfall can be found at https://group.vattenfall.com.

1.3 The Proposed Development

Vattenfall Wind Power Ltd (the Applicant) is seeking consent pursuant to Section 36 of the Electricity Act 1989 to install and operate a wind farm comprising up to 16 wind turbines and associated infrastructure, with a generation capacity of approximately 105.6 (MW), and a Battery Energy Storage System with a power capacity of approximately 50MW.

The proposed development is located within Aultmore Forest, approximately 6km north of Keith and 7km south of Buckie in Moray, northeast Scotland. The 'Site' refers to all land within the red-line boundary, as displayed in **Figure 1**. The Site lies wholly within the Moray Council (MC) administrative boundary. **Figure 1** shows the general location of the Site, and **Figure 2** shows the extents of the application Site boundary.

The area of the Site extends to approximately 2,400 hectares (ha), with the proposed wind turbines located in the eastern and western parts of the Site, which comprises almost entirely commercial plantation forestry, managed on behalf of the Scottish Ministers by Forestry and Land Scotland (FLS). Outwith the Site, the landscape comprises a mixture of lower level rolling agricultural land



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interspersed with forested hills, with Keith located to the south. To the north of the Site is the Moray Firth, with the settlements of Buckie and Cullen located along the coastline.

To the east of the Site are the operational wind turbines Nethertown of Windymills and Myreside Crossroads, whilst individual turbines for Balnamoon and Followsters are located to the south / southeast of the Site.

The proposed development comprises up to 16 three-bladed horizontal axis wind turbines of up to 200m blade tip heights. The turbines would be nominally rated at 6.6MW, giving the proposed development an overall generating capacity of 105.6MW.

Associated permanent infrastructure would include wind turbine foundations, low to medium voltage transformers and related switchgear adjacent to each wind turbine, crane hardstand areas adjacent to each wind turbine, underground electrical and communication cabling, a substation compound containing electrical infrastructure, control building and welfare facilities, a battery energy storage system (BESS) compound, access tracks including watercourse crossings, turning heads and site entrances from the public road network, search areas for up to four borrow pits; and two temporary construction compounds and a temporary batching plant compound.

A BESS is included as part of the application to improve the operational performance of the proposed development. It is anticipated that the BESS will have a storage capacity of up to 50MW.

The construction phase of the proposed development would take approximately 18 months, depending upon seasonal working and weather conditions. Once constructed, it is anticipated that the proposed development would have an operational life of up to 35 years.

The proposed development infrastructure is presented in Figure 3 and described in detail in Chapter 2: Proposed Development Description of the EIA Report.

1.4 **Need for and Benefits of the Proposed Development**

Both UK and Scottish Government energy policy recognises the need for substantial increases in renewable energy generation, in particular onshore wind, if the transition towards net zero is to be achieved. Furthermore, recent global events have also shed a spotlight once again in UK energy policy on the importance of having greater security over our future energy supplies and the importance of generating more of the UK's energy domestically.

The UK and Scotland's current climate change ambitions are amongst the highest in the world. The Scottish Government declared a climate emergency in May 2019, and in March 2020 the Scottish Government brought into force the measures in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 passed by the Scottish Parliament in September 2019. This sets out a net zero target by 2045 and further interim targets of reductions in CO² emissions (compared to 1990 levels) of 56% by 2020, 75% by 2030, and 90% by 2040. In December 2020, the Scottish Government published the 'Climate Change Plan Update' which updates the 2018 Climate Change Plan to reflect the increased ambition of the new targets set by the Act. These targets build on the Scottish Energy Strategy's (Scottish Government 2017) target of 50% of all energy (including transport, heat and electricity) being supplied from renewables by 2030.

On the 27th of June 2019, Moray Council declared a Climate Change Emergency and agreed that a Climate Change Strategy and action plan would be prepared and adopted with the aim of Moray Council becoming carbon neutral by 2030. This Strategy was adopted in March 2021, and within it states that "This Strategy commits the Council to reduce its own carbon emissions to net zero by 2030 ..." "... A key factor will be the decarbonisation of the electricity supply grid where energy from fossil fuels is replaced with renewables." This highlights the necessity for additional renewable energy generation in transitioning to net zero.

The proposed wind turbines would have an anticipated total nominal capacity of approximately 105.6MW. The annual generation from the wind turbines is estimated at approximately 411 Gigawatt hours (GWh) based on a site derived capacity factor of 44.5%.



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The proposed wind turbines will supply renewable electricity equivalent to the approximate annual domestic needs of up to 117,312¹ average UK households.

Each unit of renewable electricity transmitted will displace a unit of conventionally generated electricity, thereby displacing carbon dioxide (CO²) emissions. It is estimated that the proposed wind turbines will reduce UK CO² emissions by approximately 177,833² tonnes per year, or 6,224,155 tonnes over the anticipated 35-year lifespan of the proposed development.

1.5 Effect on Greenhouse Gas Emissions

The First Minister of Scotland declared a climate emergency in April 2019. In response, the Scottish Government introduced amendments to the Climate Change (Scotland) Act 2009 through the Climate Change (Emission Reduction Targets) (Scotland) Act 2019. The 2019 Act amendment sets legally binding targets requiring Scotland to reduce carbon emissions to net zero by 2045, with interim targets to reduce emissions by 56% by 2020, 75% by 2030 and 90% by 2040. A series of annual targets towards this net zero and interim target have also been set. These new greenhouse emissions targets represent a substantial increase over the targets set in the previous Act, in particular over the period to 2030.

The proposed development would reduce greenhouse gas emissions through replacing fossil fuel generation. The length of time a wind turbine needs to be in operation before it has replaced as much carbon dioxide as was released in its lifecycle (by displacing fossil fuel energy generation) is known as the carbon payback period.

A carbon balance assessment has been undertaken for the proposed development using the latest version of the Scottish Government's carbon calculator for wind farms (version 1.7.0). The results from the carbon calculator reveal that the net impact of the proposed development will be positive overall by reducing carbon emissions. Over its proposed 35-year operational life, it is expected to generate over 34 years' worth of clean energy if it replaced fossil fuel-mix electricity generation and around 33 years' worth of clean energy if it replaced cleaner grid-mix electricity generation (which includes some fossil fuels and low carbon electricity generation sources such as nuclear, hydroelectric and wind energy).

Over the expected 35 years that the proposed development is likely to be generating carbon-free electricity, this could result in 6.22 million tonnes of net carbon dioxide emission savings when replacing fossil fuel-mix electricity generation.

Overall, the proposed development would therefore lead to substantial net carbon savings and reduction of greenhouse gas emissions over its operational life.

1.6 Biodiversity Enhancement and Restoration

A Biodiversity Enhancement and Restoration Plan (BERP) will be produced for the proposed development. The overall purpose of the BERP will be to implement positive land management for the benefit of landscape and nature conservation which will mitigate any adverse ecological impacts that the proposed development may have. In addition to purely mitigating any adverse impacts, the applicant is committed to enhancing the nature conservation and landscape value of the site.

The BERP would be targeted to deliver benefits to degraded bog habitats and riverine habitats. An outline BERP is included in **Technical Appendix 8.6** of the EIA Report which outlines the proposals for the following key goals:

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¹ Calculated using the most recent statistics from the Department of Business, Energy and Industrial Strategy (BEIS) showing that annual GB average domestic household consumption is 3,509kWh (as of December 2022, updated annually).

² When considered against the fossil fuel mix of the UK electricity grid.

- Restoration of Degraded Peatland Habitats on Site through bog restoration approaches.
- Restoration of Heathland Habitats in the cleared areas around turbines.
- Enhancement of Riparian Corridors to provide important habitat for protected species.
- Enhancement and Restoration of Woodland Habitats, particularly around Ancient Woodland and native species replanting.

The habitat management actions proposed in the BERP are expected to compensate for losses of habitat due to the wind farm's construction via forest to bog restoration. The improvement of habitat condition on site is expected to contribute to on-site natural capital (stocks) and ecosystem services including, carbon sequestration and storage, water storage and regulation as well as enhancing biodiversity.

2.0 Site Selection and Design

The Site contains a consented wind farm (application reference: 07/02375/EIA) within the applicant's control. The consented site was originally chosen for a wind farm for the following reasons at the time:

- Favourable wind resource.
- Landowner cooperation.
- Located within a Moray Council Preferred Area for wind farm development.
- Minimal adverse ecological impact due to existing site quality.
- Developing an altered commercial forestry site as opposed to valued moorland.
- Significant opportunities for habitat and wildlife enhancement.
- Following the successful consenting of the 2007 application in 2014, a condition was put in place requiring the applicant to agree aviation and radar mitigation with the MOD to mitigate any potential impacts on the MOD radar at Lossiemouth.

Since then, significant changes in both turbine technology and the UK electricity market have taken place. Further, it is considered that the turbine layout for the consented scheme underutilises the Site's potential for clean energy generation. Studies completed by Vattenfall identified the potential to redesign the Site using up-to-date turbine technology and a wider footprint to increase its contribution to government climate targets and policy, including its 2019 declaration of a Climate Emergency.

This combination of factors provides the rationale for the redesign and optimisation of the Site - reconfiguring it using up-to-date turbine technology thereby increasing its clean energy productivity and enhancing its commercial viability in the foreseeable electricity market.

2.1.1 Design Principles and GIS

When considering the potential for the Site to be redesigned to accommodate larger, modern wind turbines, a GIS model has been developed by SLR and the applicant for the Site which seeks to mirror planning, environmental, technical and commercial constraints. The GIS model is updated regularly when new data becomes available or when other factors change. Where available and appropriate, the GIS model incorporates published advice from statutory consultees.

Key issues and constraints for consideration in the design process were established through a combination of desk-based research, extensive field survey and consultation (through the EIA scoping process). The design process considered the following key issues and constraints:

• landscape designations and visual amenity.



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- archaeological and cultural heritage assets.
- sensitive fauna.
- sensitive habitats.
- watercourses, private water supplies and sensitive surface water features.
- topography and ground conditions.
- public road accessibility.
- recreational and tourist routes.
- proximity of residential properties.
- aviation and defence constraints.
- presence of utilities.

Information in respect of the survey work to identify various key issues and constraints and how they have contributed to the layout design has been investigated in greater detail in the EIA Report.

Environmental surveys for the proposed development, for example for birds and other species, peat depth, archaeology and other matters of interest, ran over a period from 2020-23 and also made use of data gathered for nearby wind farm applications where relevant. There was also extensive historical data collected during the development of the existing 2014 consented wind farm on the Site.

The data gathered enabled the applicant to investigate a number of different design iterations before settling on the final design which maximises the efficiency of the proposed development whilst limiting the potential environmental impacts.

The proposed development has been in the design process for a considerable time and the layout has evolved iteratively, including responding to issues raised during and after scoping, having considered different numbers, sizes and locations of wind turbines. Such changes have been influenced by several factors including economics, community and stakeholder feedback, planning policy and potential environmental effects.

Full details of the site design process undertaken for the proposed development is provided in **Chapter 2: Proposed Development Description** of the EIA Report.



3.0 EIA Approach and Technical Assessments

3.1 Introduction

The EIA has identified the likely effects of the proposed development on the environment and an assessment has been made as to whether any of these effects could be significant. Conclusions about significance are determined by the sensitivity of the baseline conditions (the sensitivity of the receptor) combined with the predicted degree of alteration (the magnitude of change) from the baseline conditions that will occur as a result of the construction, operation and decommissioning of the proposed wind farm. **Chapter 5: Approach to EIA and Consultation** of the EIA Report sets out the EIA approach and methodology employed in more detail.

Good practice advises that the EIA should be an iterative process rather than a unique, post design appraisal. In this way the findings of the environmental assessments can be used to inform the design of the proposed development to respond to the environmental constraints and opportunities present. This approach has been adopted in respect of the proposed development; where likely adverse effects have been identified, consideration has been given to removing or reducing these through evolving the design of the proposed development.

This section provides a brief, non-technical summary of the main findings of the EIA as set out in the technical assessment chapters (chapters 6 to 15) within the EIA Report.

Consultation on the scope and methodologies for each of these technical assessment chapters was agreed through a formal EIA scoping opinion request to the Scottish Government Energy Consents Unit. In addition, there has been continued dialogue with relevant statutory and non-statutory consultees both before and after the scoping opinion request was submitted to the Scottish Government.

3.2 Landscape and Visual

Chapter 6: Landscape and Visual Assessment of the EIA Report considers the likely significant landscape and visual effects associated with the construction and operation of the proposed development.

3.2.1 Methodology

The assessment method for this LVIA draws upon the established GLVIA3; An Approach to Landscape Character Assessment (Natural England, 2014), Landscape Institute Technical Information Note 05/2017 regarding townscape character; LI Technical Guidance Note 02/2019 Residential Visual amenity assessment (RVAA); Landscape Institute's Technical Guidance Note 02/21: Assessing landscape value outside national designations; LI Technical Guidance Note 06/19 Visual Representation of development proposals and other recognised guidelines.

3.2.2 Landscape Character

There will be significant effects on the unit of Landscape Character Type (LCT) 9 Low Forested Hills which includes the Site, as a result of the proximity of the turbines which will become a dominant feature, alongside the forestry, in this small area. Other units of this LCT will not be significantly affected.

There will also be significant effects on LCT 8 Upland Farmland which surrounds the forested hills of the site. These significant effects will primarily arise from the proximity and relatively wide visibility of the turbines within 5km, though there would also be changes as a result of views towards the turbines from the rural areas around Keith.

Significant effects will also arise on the unit of LCT 3 Rolling Coastal Farmland near Clochan and Drybridge. These significant effects will arise as a result of views towards the turbines within 2-5km,



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particularly from the broader and more open upland areas closer to the site and in the eastern end of the unit.

3.2.3 Visual Receptors

The area immediately surrounding the site within approximately 1km is a forested upland with limited settlement or transport routes. There will be significant effects on Core Path KTO1 / Fishwives Road which passes through the site between the two groups of turbines. The path is partly enclosed by forestry though recent felling has opened up a large part of the southern section through the forestry. There will be widespread and close views of the turbines for walkers using this route.

There will also be significant effects on visual receptors living, visiting or travelling through the rural areas within 5km of the proposed turbines. Visibility within this area varies, with the valleys to the east and west predominantly having visibility only of the nearer group of turbines, and receptors to the north and south more typically having views of both groups. Effects would reduce with distance, Large scale changes to views will arise within 2km, reducing to Large/Medium between 2-4km, though some locations at this distance (Aultmore and Grange Crossroads) will have Medium scale changes to views due to more limited visibility or the presence of other turbines.

3.2.4 Designated Areas

There will be no significant effects on designated landscapes. There will be Moderate Adverse effects on the special qualities of the Portgordon to Cullen Coast Special Landscape Area primarily as a result of the turbines being seen in views towards the wooded policies of Cullen House and towards the landmark hill of Bin of Cullen.

3.2.5 Night-time Effects

The wider area is well settled and there are a number of more prominently lit structures within the wider area around the Site, including bonded warehouses and a transmitter mast. Existing turbines to the east of the Site also have aviation lights, albeit these are only 25 candela and thus relatively dim. There would be no significant effects arising from views of the aviation lighting at night.

A reduced lighting scheme, limiting the number of turbines lit with visible aviation warning lights and the type of light to be used has been agreed with the Civil Aviation Authority. See **Chapter 14: Aviation and Radar** for details of the proposed lighting scheme.

3.2.6 Cumulative Effects

Cumulative effects with existing and consented wind farms are considered within the main LVIA and are summarised above. Wind farms in planning are located 20km or more to the south and all are associated with existing and/or consented wind farm clusters and the proposed development would not give rise to cumulative effects with these. Teindland wind farm is in scoping and would be located approximately 12km to the west of the Site. There would be some very limited cumulative visual effects with this scheme in the area to southwest of Mosstodloch, where the non-significant effects of the proposed development would be reduced slightly in the context of a consent for Teindland wind farm.

3.2.7 Conclusion

Significant effects arising from the proposed development will be localised – affecting landscape and visual receptors within 5km of the turbine locations. No nationally or regionally important receptors will be significantly affected.



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3.3 Archaeology and Cultural Heritage

Assessment of the proposed development on Cultural Heritage and Archaeology are presented in Chapter 7 of the EIA Report.

Cultural Heritage and Archaeology refers to assets which contribute to the historic environment. The cultural heritage and archaeological assessment is completed in two parts; direct impacts upon non-designated heritage assets and indirect impacts upon designated heritage assets. A Study Area of 1km from the Site boundary was used to procure non-designated cultural heritage data and 10km for designated cultural heritage assets. The assessment used a desk-based approach to review known and potential archaeology within the Site and designated heritage assets coupled with data obtained during a targeted archaeological walkover and setting assessments.

As requested by consultees, regionally significant assets recorded on the Aberdeenshire Council Archaeology Service (ACAS) Historic Environment Record (non-designated) were assessed at the same level as regionally significant designated heritage assets. Impacts caused by the transport route were also assessed within the EIA where appropriate.

A total of 64 heritage assets of national importance and 53 of regional importance were identified within 10km of the Site boundary. In agreement with Historic Environment Scotland (HES) and ACAS, it was agreed that 23 of these assets would be scoped in for further assessment within the EIA. All others were excluded as the assets and approaches fell outside the Zone of Theoretical Visibility (ZTV) and their setting having no predicted significant effects.

The overall archaeological potential for the Site is moderate. There is a recorded prehistoric cairn (SLR07) within the Site that indicates the use of the Site in a funerary context during the prehistoric period, and two undated cairns (SLR254 and SLR251) which may be part of this prehistoric funerary landscape, although only the latter has partial surviving remains. Other recorded remains within the Site comprise 90 recorded post-medieval assets, mostly comprising assets of an agricultural nature such as earthworks, farmsteads and enclosures but also indications of peat cutting, quarrying and lime kilns. There are also two Second World War features (SLR249 and SLR 250) within the Site which indicate the land within the Site was at some point used for military training.

A total of 17 of the recorded assets within the Site have been identified as being susceptible to direct impacts during the construction phase of the proposed development. Additionally, considering the above, the assessment identified a moderate potential for prehistoric and post-medieval archaeological remains. The potential for Romano-British, early medieval and medieval remains is considered low. Any archaeological remains pre-dating the post-medieval period are likely to have been susceptible to impacts from the post-medieval agricultural and land-use activities.

Of the designated heritage assets assessed for potential indirect impacts during the operation and maintenance phase of the proposed development, no assets were presented with a moderate or above significance of effect. The highest identified effect was a slight impact to setting of Letterfourie House (Category A Listed Building, LB5541), based on the visibility of the proposed development from the asset and its impacts on the architectural and historical significance of the building.

Mitigation has been implemented through design where possible by avoiding non-designated heritage assets within the Site, including fencing the area around them to prevent accidental damage. Where it isn't possible to avoid the assets, a watching brief following a WSI has been proposed in the areas of ground-breaking construction proximate to these asset's recorded locations.

The assessment identified no predicted cumulative impacts nor any decommissioning effects from the proposals.



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3.4 Ecology

Assessments of the relevant potential effects upon ecology and biodiversity are presented in Chapter 8 of the EIA Report. The assessment discusses the methods used to establish the ecological species and communities present in the vicinity of the site, together with the process used to determine their nature conservation value. The ways in which ecological features or species could be affected (directly or indirectly) by the construction and operation of the proposed development are explained, and an assessment is made with regards to the significance of these effects.

Desk-based studies and field surveys were carried out in and around the site over respective 'study areas' to establish baseline conditions and the species and communities present.

Additional measures will be put in place during the construction phase to protect key species and will be detailed in the CEMP, BERP and Species Protection Plans. An Environmental Clerk of Works (EnvCoW) will be appointed to monitor adherence to such plans.

A Shadow Habitat Regulations Appraisal (sHRA) Screening Report provides a robust initial assessment of the conservation objectives of the relevant International / European designated sites of non-avian ecological interest with details of their designated features. Potential Likely Significant Effects (LSEs), the screening parameters, potential pathways of effect in the absence of avoidance, mitigation and enhancement measures are outlined.

Chapter 8 and Chapter 9 take forward the assessment of identified LSEs to resolve with adoption of avoidance, mitigation and enhancement measures prior to reaching a conclusion. The HRA test is whether the proposed development will have an adverse effect on the integrity of any International/ European site in the light of the conservation objectives for the qualifying interest features detailed within this screening assessment. In conclusion, no effect was found to undermine the conservation objectives that is considered an adverse effect on the integrity of the site/ favourable conservation status, and vice versa. No effects would result in any breach of the Habitats Regulations, either alone or in combination with other identified projects.

The proposed development would result in a significant negative effect for the loss of degraded blanket bog level at a local level. However, this habitat loss would be compensated by a significant positive effect through the peatland restoration proposed in the outline BERP. The scale of the positive effect is dependent on how much restoration is undertaken, though there is potential for a positive effect at the county level.

With the implementation of continued good practice measures, species specific mitigation measures and the implementation of the outline BERP, no significant negative effects are predicted during the operational or construction phases of the proposed development.

3.5 Ornithology

Assessment of the relevant potential effects upon ornithology is presented in Chapter 9 of the EIA Report. The assessment discusses the methods used to establish the bird species and populations present in the vicinity of the site, together with the process used to determine the nature conservation value of the birds that use the site. The ways in which birds could be affected (directly or indirectly) by the construction and operation of the proposed development are explained, and an assessment is made with regards to the significance of these effects.

Desk-based studies and field surveys were carried out in and around the site over respective 'study areas' to establish baseline conditions and the bird populations present. The proposed development is not located within any ornithological designation.

The focus of the ornithological impact assessment were the key bird species identified by NatureScot as being at potential risk of impact from wind turbines that were recorded at the Site.

Key species recorded during the breeding season surveys in the study area included lapwing, curlew, snipe, hen harrier, goshawk, sparrowhawk, buzzard, osprey, peregrine and kestrel. Of these species,



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farmland/open ground outside the forest.

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Key species recorded at risk of collision (i.e. flying through the site at rotor height) included pink-footed goose, greylag goose, and common gull. Collision risk modelling was carried out for these species. The likely potential impact of collision mortality on species assessed, all of which are

qualifying features for all designated sites within 20 km, would not be significant.

only goshawk and kestrel were observed within Aultmore Forest; the others were observed on the

All other potential impacts on the species assessed, including nest damage or destruction, habitat loss and change (direct and indirect), disturbance/displacement and barrier effects would not be significant.

Under the Conservation (Natural Habitats, &c.) Regulations 1994, as amended (the Habitats Regulations) any development that may have a likely significant effect (LSE) on an SPA or Special Area of Conservation (SAC), either alone or in combination with other projects, requires an Appropriate Assessment to be carried out by the relevant competent authority, to determine whether or not the development would have an adverse effect on the integrity of the SPA or SAC.

The ornithological assessment focused on the potential for the proposal to impact the Moray and Nairn Coast SPA, Tips of Corsemaul and Tom Mor SPA and Loch Spynie SPA due to collision mortality and barrier effects for wintering pink-footed and greylag geese and breeding common gull populations associated with these SPAs. Only negligible effects were considered possible.

In conclusion, taking into consideration the findings of the assessment, the Aultmore wind farm redesign, alone or in combination with current plans and projects, could not result in a likely significant effect on the integrity of the Moray and Nairn Coast SPA, Tips of Corsemaul and Tom Mor SPA and Loch Spynie SPA.

The likely potential impact of collision mortality on species assessed, all of which are qualifying features for all designated sites within 20 km, would not be significant.

All other potential impacts on the species assessed, including nest damage or destruction, habitat loss and change (direct and indirect), disturbance/displacement and barrier effects would not be significant.

Whilst there are no significant effects predicted, additional controls will be put in place during the construction phases and will be detailed in the CEMP and Breeding Bird Protection Plan. The detailed measures will be implemented during construction to protect species within the site, and an EnvCoW will be appointed to monitor adherence to such plans.

3.6 Hydrology, Hydrogeology and Geology

An assessment has been carried out of the likely impacts of the proposed development on the hydrological, hydrogeological and geological environment, including private water supplies is presented in Chapter 10 of the EIA Report. The assessment has considered site preparation, construction and operation of the proposed development.

The potential effects have considered:

- Peat and soils;
- Pollution Risks;
- Erosion and sedimentation:
- Fluvial Flood Risk
- Infrastructure and Man Made Drainage; and
- Water Abstraction.



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Following the identification and assessment of the key receptors, taking into account the potential effects listed above, a comprehensive suite of embedded mitigation and good practice measures has been incorporated into the design, including extensive buffer areas. In addition, a site-specific CEMP as well as detailed design of infrastructure and associated mitigation will be implemented to protect the groundwater and surface water resources from pollution and minimise changes to the hydrological environment. An outline version of the CEMP supports this application in **Technical Appendix 2.1: Outline CEMP** which will be built upon as more site-specific information and ground investigation results are provided post-consent.

The impact assessment has taken into account the hydrological regime, highlighting that the principal effects will occur during the construction phase. Following the successful design and implementation of mitigation measures the significance of construction effects on all identified receptors are not defined as significant. The assessment of predicted operational effects has determined that the significance of effects on all receptors to be of no significance.

Good practice, design and construction of the proposed development delivered through a skilled team of competent workers, with mitigation and compliance monitored in collaboration with the Scottish Environmental Protection Agency (SEPA), MC and other engaged stakeholders, will result in a development that is considered to be not significant in terms of impacts on geology, hydrology and hydrogeology.

3.7 Climate and Carbon Balance Assessment

The results of the Climate and Carbon Balance Assessment (**Technical Appendix 15.1**) reveal that the net impact of the proposed development at Aultmore will be positive (i.e. reduce the level of UK emissions) overall.

Peatland is an important carbon store, and the proposed development has potential to impact peat, despite mitigations proposed to limit disturbance to peat and bog habitats. A carbon balance assessment report has been produced and the Scottish Government's online carbon calculator tool was completed to determine the carbon payback time for the proposed development (see EIA Report **Technical Appendix 15.1** for full details). The results from the carbon calculator reveal that the net impact of the proposed development will be positive overall, as over a 35-year operational lifespan of the proposed development, it is expected to generate more than 33 years' worth of clean energy - if it replaced fossil fuel-mix electricity generation - and nearly 32 years' worth of clean energy if it replaced cleaner grid-mix electricity generation.

In addition, over the lifespan of the wind farm, this could result in over 6.22³ million tonnes of net CO² emission savings when replacing fossil fuel-mix electricity generation. The payback period represents approximately 5% (2 years) of the operational period (35 years) and the positive contribution through clean energy production is 95% (33 years), it is possible to conclude that the positive contribution is statistically significant, and that proposed development facilitates the reduction of greenhouse gas emissions from energy production.

3.8 Traffic and Transport

Chapter 11 of the EIA Report considers the potential effects of the proposed development on access, traffic and transport during construction.

The proposed development would be accessed via a newly constructed junction on the B9016, approximately 100m to the north of Ryeriggs Croft.

Baseline traffic information was obtained from the UK Department for Transport (DfT) database and from Transport Scotland database survey information. National Road Traffic Forecast (NRTF) low

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³ Calculation is 35 years x 177,833 tCO₂ (as shown in EIA Report **Technical Appendix 15.1** and online submission).

capacity of the road.

growth factors, as well as committed development trips, were applied to the current baseline to estimate future baseline flows. The proposed development, under a worst case scenario where all aggregates are imported to the Site rather than sourced from the four onsite borrow pits, predicts a 13% increase to the total flow of traffic on the B9016, but this will not have a material impact on the

Delivery of Abnormal Indivisible Loads (AIL) could cause disruption to the local road network. Turbine deliveries would be undertaken in consultation with the relevant authorities, including Moray Council, Transport Scotland and Police Scotland and could include movements during the night which would reduce effects on road users at busier daytime periods. Deliveries would be scheduled where possible to avoid peak times of the day and school opening/closing times. The peak summer tourist month will also be avoided. Deliveries of AILs will be outwith Broadley Crematorium's core opening hours (09:00 – 17:00, Mondays to Fridays) to avoid disruption to this facility. The Crematorium is located approximately 100m west of the B9016 and 700m south of the A98/B9016 junction.

The following measures will be implemented to mitigate any adverse effects of additional traffic during the construction phase:

- Construction Traffic Management Plan (CTMP); and
- Abnormal Indivisible Load Transport Management Plan (ATMP).

Taking account of all the potential effects that are likely to arise and the assessment having tested the worst-case scenario expected, it is considered that the proposed development would not lead to a significant adverse effect in regard to traffic impacts.

The assessment concludes that the impacts during the construction phase will not be significant; the review of the worst-case scenario, the temporary nature of the construction phase and the application of mitigation measures will further reduce any impacts in traffic and transportation terms.

3.9 Noise

Chapter 12 of the EIA Report considers the likely significant effects of noise associated with the construction, operation and decommissioning of the proposed development. The specific objectives of the assessment are to:

- Describe the noise baseline;
- Describe the assessment methodology and significance criteria used in completing the impact assessment;
- Describe the potential effects and cumulative effects;
- Describe the mitigation measures proposed to address likely significant effects; and
- Assess the residual effects remaining following the implementation of mitigation.

Cumulative effects that may arise from the proposed development are assessed in combination with other wind turbine developments, which are the subject of a valid planning application (including operational, under construction and consented developments).

The operational assessment follows guidance set out in ETSU-R-97 on the assessment of noise from wind turbines which includes the following stages:

• Baseline noise survey conducted at noise sensitive receptors around site and correlated with standardised 10 m height wind speeds measured concurrently on site;



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- Plots of baseline LA90 noise levels against standardised 10 m height wind speed used to derive prevailing daytime and night-time background noise curves for a range of wind speeds up to 12 m/s;
- Derived prevailing background noise curves are used to define daytime and night-time noise limits calculated in accordance with ETSU-R-97;
- Predicted noise levels have been calculated / modelled using ISO 9613-2 methodology implemented using proprietary noise modelling software;
- Noise contour plots have been produced showing predicted LA90 at a height of 4 m above ground level assuming downwind conditions in all directions (not possible in practice but represents worst-case for all receptor locations); and
- Worst-case downwind predicted noise levels have been compared to the noise limits.

Construction and decommissioning noise effects have been scoped out of detailed assessment as agreed with Moray Council.

The operational assessment is based on the proposed development as described in Chapter 3 of the EIA Report and assumes the installation of 16 turbines up to 200 m tip height and 6.6 MW power output each. For the purposes of the EIAR and this noise assessment, a Siemens Gamesa SG170 6.6 MW candidate turbine has been used for the model.

Operational noise predictions have been carried out for the candidate wind turbine under consideration for the proposed development, as well as several neighbouring schemes, in line with the methodology set out in the Institute of Acoustics (IOA) GPG (IOA, 2013). The results of these predictions have been compared with derived noise limits and show no exceedances, and therefore no requirement for mitigation measures. The construction and operational noise effects associated with the proposed development operating in isolation and cumulatively with other potential development in the area are considered not significant.

3.10 Socioeconomics, Recreation and Tourism

Chapter 13: Socio-Economics, Tourism and Recreation of the EIA Report evaluates the likely socio-economic effects, including recreation and tourism effects, associated with the proposed development.

The assessment has been broken down into two phases, the construction phase (lasting approximately 18 months) and an operational phase of 35 years. These are then further broken down into the following study areas.

3.10.1 Study Areas

For the purposes of the assessment, the 'socio-economic' and the 'tourism and recreation' issues are separated to better reflect the differing geographic areas that each would be most felt. For the socio-economic aspect, a Wider Study Area (WSA) has been set as the Moray Council administrative area but referencing Scotland and the UK as a whole where relevant.

When assessing the impacts on tourism and recreational receptors, the study area is more refined to reflect the fact that the proposed development would only have the potential to impact each of these receptors at a more local scale. In pursuit of this, a Local Area of Influence (LAI) was used to reflect the geographic area of these receptors, defined as a 5km radius of the boundaries of the proposed development. Given the scale of the landscape, which is very open and the sparsity of receptors in this area, the LAI has been extended to also encompass the stretch of coast from Spey Bay to Sandend.



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3.10.2 Socio-Economic Impact

The assessment of the economic impacts associated with the proposed development was based on 16 wind turbines, generating a maximum of 6.6MW each, for a total generating capacity of 105.6MW, as well as the addition of a 50MW BESS. On this basis, it was estimated that the expenditure associated with construction and development activity could generate:

- £3.8 million GVA and 85 person-years in Moray;
- £13.3 million GVA and 281 person-years in Scotland; and
- £30.3 million GVA and 642 person-years in the UK.

During the operational phase, it is likely that four to seven permanent direct jobs would be needed to operate and maintain the proposed development, based on experience with similar projects elsewhere across Scotland. In addition to this, it is expected that there is likely to be between 16 and 20 overall indirect jobs created through the supply chain effects associated with the proposed project within Moray administrative area. Using the mid-point estimates of 5 direct and 18 indirect operational jobs, a total of 23 permanent jobs within the local area is estimated to be created which, when used for the assessment of significance, is considered to be a minor but beneficial effect.

Information from other comparable projects indicates that a wide range of supply chain businesses could expect to benefit from the investment in the local and Scottish economy, including waste management, aggregates supply, forestry services, equipment hiring, fencing and catering. The Applicant would employ good practice measures with regard to maximising local procurement, including the implementation of a Local Contractor Policy, where additional weight is given in the tendering process to primary contractors that show a clear commitment to increasing local content in their supply chains.

The proposed development is expected to support the provision of local public services and the investment priorities of local communities. During its operations, it is expected to generate approximately £528,000 each year in annual contributions to a community benefit scheme, as well as further benefits through a proposed shared ownership scheme.

3.10.3 Tourism and Recreational Impacts

With regard to recreation and tourism assets, local services, such as food and drink businesses and accommodation, were found to experience beneficial impacts during construction due to use by construction workers. The level of effect may be high for individual businesses, however as a whole it was found to be a moderate beneficial effect. Other tourism assets were considered to be in locations which were beyond the distance where significant effects related to the proposed development would occur.

For recreational activities during construction, the Right of Way (RoW) GM/GM11/1, Core Path KT01 and the Buckie Fishwives Heritage Path (three designations for the same path route) were identified as being impacted directly by the proposed development. Further unrecorded RoWs and forestry tracks used for recreation were also considered to be impacted in the same way. As such, the assessment of the Right of Way GM/GM11/1, Core Path KT01 and the Buckie Fishwives Path Heritage Path were primarily considered in the assessment.

The paths would primarily be impacted through diversions and/or closures. The preparation of, and adherence to, an Access Management Plan (AMP) was identified as mitigation to reduce the impacts from the temporary restriction of public access by specifying agreements for the announcement of any impacts and the plans and processes in place to continue the usage of the paths.

An Outline AMP is included as **Technical Appendix 2.3**. Further mitigation is included within the Outline AMP in the form of strategically sited signage, which details the timings of the closures as well as a map of the route and contact details of the construction manager, and mapping of the



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routes. New pass gates are proposed to be installed to allow for non-vehicular access, as well as separating vehicles from pedestrians and non-motorised forms of transport.

Recreationally, with plans in place, the amenity of the usage would be reduced temporarily, however, the recreational quality of the routes would be impacted to a lesser degree, resulting in a minor and not significant effect.

In operational terms, the mitigations offered through an AMP, such as signage promoting access, path improvements, linkages of the routes, and mapping of the routes would result in a recreational benefit, helping form a larger recreational path network throughout and beyond the Site. This resulted in a reduced visual amenity due to the presence of turbines but an increased recreational amenity, resulting in a minor and not significant effect.

This finding is in line with the literature on the relationship between wind farm developments and tourism. Published research finds there is no evidence that wind farm developments have an impact on tourism assets at the Scottish and regional level, nor in those areas in the proximity of an onshore wind farm development.

3.11 **Forestry**

Part of the proposed development is located within commercial forestry. The forestry assessment has identified that areas of forestry would require to be felled for the construction and operation of the proposed development.

Forestry is not regarded as a receptor for EIA purposes. Commercial forests are dynamic, and their structure continually undergoes change due to normal felling and restocking by the landowner; natural events, such as storm damage, pests or diseases; and external factors, such as a wind farm or other developments. The forestry proposals are interrelated with environmental effects, which are assessed separately in other chapters of the EIA Report.

The forestry proposals have been developed to identify areas of forest required to be removed for the construction and operation of the proposed development; and those areas which may or may not be replanted on site.

The Forestry Study Area (FSA) extends to approximately 2,415.2 ha and is comprised of woodlands within the National Forest Estate managed by Forest and Land Scotland. The forests are comprised largely of commercial conifers with areas of mixed broadleaves and open ground planted in the late 1990s. The crops are in the mid restructuring phase and there have been recent felling and replanting programmes.

A total of 158.8 ha will require to be felled to enable the construction and operation of the proposed development. The majority of the areas to be felled for the proposed development would be restocked except for land required for the proposed development's permanent infrastructure and land to be left unplanted for forest management; or forest design purposes.

On site replanting of felled areas and restoration of habitat within the woodlands results in an overall decrease in the area of stocked woodland. There would be a decrease in 149.2 ha within the FSA. Additional off site compensatory planting will be required, in line with the Scottish Government's Policy.

Aviation and Radar 3.12

Chapter 14 of the EIA Report considers the potential impacts of the proposed development on civil and military radar and aviation infrastructure.

Wind turbines have the potential to affect the performance of radar equipment used for air traffic control, air defence and rainfall forecasting. They may also present an obstacle hazard to aircraft flying at low altitude near airports or in military low flying areas and may affect the minimum heights at which aircraft are allowed to fly on instrument flight procedures in the vicinity of airports.



The aviation assessment of the proposed development found that the development has the potential to affect the primary surveillance radar (PSR) and the precision approach radar (PAR) at RAF Lossiemouth. The Lossiemouth PSR is a new installation whose design incorporates data processing features to filter out the returns from wind turbines. Trials of these features will be conducted in winter 2023-24 and are expected to confirm that they will filter out the returns from the proposed development.

The line of sight from the RAF Lossiemouth precision approach radar to the proposed turbines is wholly or partially blocked by a building on the airfield. Evidence from other PAR-equipped UK military airfields with wind farms within their line of sight indicates that no adverse effects have been experienced. In the event that the effects of the proposed development on the Lossiemouth PAR are deemed to be significant, mitigation is available in the form of re-aligning the radar so that the proposed development is wholly outside its coverage, or replacing the PAR with an Instrument Landing System.

The Primary Surveillance Radar (PSR) at Inverness Airport has marginal theoretical line of sight to the blade tips of one of the sixteen turbines in the proposed development. However this is unlikely to translate into the turbine being displayed on the Inverness Airport radar and is assessed as a negligible effect.

The air defence PSR at Buchan is assessed as having theoretical line of sight to the blade tips of between two and four turbines in the proposed development. In the event that the effects of the proposed development on the Buchan PSR are deemed to be significant, mitigation is available in the form of additional processing within the radar to filter out returns from wind turbines.

There will be no effects on the instrument flight procedures at Aberdeen or Inverness Airports. The minimum altitude for one of the instrument flight procedures at RAF Lossiemouth would require to be raised. This would be achieved by revising and republishing the relevant chart for use by pilots. It is assessed as not being a significant impact.

The Ministry of Defence and the Civil Aviation Authority will be informed of the locations and heights of the turbines before they are constructed so that they can be depicted on aeronautical charts to enable pilots to take account of them. Effects on low flying military aircraft will be negligible because military aircrew are advised not to fly below 1000 feet within 15 nautical miles of RAF Lossiemouth.

The Civil Aviation Authority (CAA) requires any structure equal to and taller than 150m in height to be fitted with visible aviation warning lighting. The CAA has been consulted and an aviation lighting scheme has been agreed. A reduced lighting scheme for the development has been approved by the CAA and the MoD. It will consist of steady red lights on nine of the sixteen turbines and infra-red lighting (visible only when viewed through night vision goggles) on fifteen of the sixteen turbines.

In summary, it is concluded in the EIA Report that with the identified mitigation solutions in place there are no significant residual effects from the proposed development upon aviation interests.

3.13 Shadow Flicker and Other Issues

Wind turbines are tall structures which can cast long shadows when the sun is low in the sky. Given a conjunction of certain meteorological conditions (clear skies, enough wind for the wind turbines to be rotating and a low angle of the sun in the sky), observers close to a wind farm could experience a phenomenon commonly known as 'shadow flicker', where the rotating wind turbine blades pass between the sun and the observer, usually through narrow openings such as doors or windows, creating an intermittent shadow.

An assessment has been carried out to identify whether shadow flicker would be likely to occur at properties neighbouring the proposed development, and if so to predict times of day and year, and duration of these potential effects. The assessment identifies any properties which are within an area 10 times the rotor diameter of the turbines because that is where shadow effects are considered to be most apparent.



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shadow flicker.

There are 34 properties within 10 rotor diameters of any wind turbine, of which 23 fall within the shadow flicker study area which considers the areas within 130 degrees either side of north of the

proposed development.

In the event of shadow flicker causing a nuisance, a range of mitigation measures could be incorporated at the operational phase of the proposed development to reduce the instance of

proposed wind turbine locations and may experience shadow flicker effects as a result of the

Shadow flicker control modules, consisting of light sensors and specialised software, will be installed on the turbines that can prevent operation during periods when shadow flicker can be experienced at nearby properties. The installation of a programmable shadow flicker module will allow the control of turbines in order to eliminate shadow flicker. The correct operation of the installed shadow flicker control measures will ensure that there will be no impact from shadow flicker. The operation and performance of the shadow flicker control measures will be monitored on an ongoing basis.

A planning condition would provide an appropriate form of mitigation to ensure that any complaints would be investigated within a reasonable timescale and that the rectification of any substantiated shadow flicker issue would be implemented promptly and effectively. As noted in the DECC guidance (2011), it states that "Mitigation measures which have been employed to operational wind farms such as turbine shut down strategies, have proved very successful, to the extent that shadow flicker cannot be considered to be a major issue in the UK".

3.14 Telecommunications

Turbines 1 to 5 of the proposed development are located approximately 1km from a major telecommunications facility at Tor Sliasg, which supports fixed telecommunications links operated by the telephone and internet industries; the emergency and armed services; and electricity suppliers.

The telecommunications assessment found that none of the fixed microwave links to/from Tor Sliasg pass close enough to the proposed development to be affected. A number of Ultra High Frequency (UHF) scanning telemetry links operated in support of the electricity supply industry were found to be adversely affected.

The applicant has been in discussions with the Joint Radio Company (JRC), which manages scanning telemetry links on behalf of the electricity supply industry. Ongoing discussions around a technical solution to mitigate any impact on the JRC links is ongoing, but it is antiicpated that there are technical solutions available.

A planning application was submitted in 2023 for a new telecommunications mast on Leomond Hill, adjacent to the eastern end of the proposed development. The fixed link connecting this new mast to the mobile phone network was planned to run westwards to Tor Sliasg. This would have been adversely affected both by the consented Aultmore wind farm development and by the proposed development. Discussions between the applicant and the operators of the new mast led to agreement that the fixed link from Leomond Hill to the mobile phone network would be moved to a mast to the south east of Leomond Hill. This would ensure that the proposed development will have no adverse effects on the performance of telecommunications facilities at the new mast.

Terrestrial television signals in the area surrounding the proposed development are variously received from transmitters at Knockmore, near Rothes; Rumster Forest in Caithness; and Rosemarkie on the Black Isle. The assessment of potential effects on TV reception found that reception from the Knockmore transmitter could be affected in the area between Portknockie, Portsoy and the proposed development, but that mitigation could be readily implemented by changing the orientation of the subscriber's receiver antenna from Knockmore to either Rosemarkie or Rumster Forest. Alternatively, affected subscribers may be offered a switch to satellite TV, funded by the applicant.



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4.0 Next Steps and Further Information

The Scottish Government Energy Consents Unit will process the application on behalf of Scottish Ministers. At this stage, there will be an opportunity to make representations on the application to:

Scottish Government Energy Consents Unit 5 Atlantic Quay 150 Broomielaw Glasgow

G2 8LU

Email: representations@gov.scot

Online: http://www.energyconsents.scot/

4.1 Further Information

The EIA Report comprises the following:

- Volume 1: Non-Technical Summary.
- Volume 2: EIA Report Main Text.
- Volume 3a-b: Figures and Visualisations.
- Volume 4: Technical Appendices.

Hard copies of the NTS and EIA Report will be available for viewing in the following locations:

- Buckie Library 7 Cluny Pl, Buckie AB56 1HB
- Clochan Community Centre Community Centre, Clochan, Buckie AB56 5HS
- Cullen Library Seafield Rd, Cullen, Buckie AB56 4AF
- King Memorial Hall, Grange, Keith, AB55 6SL

Please see the venue websites for details of opening hours and viewing arrangements.

The Non-Technical Summary is available in hard copy free of charge, and hard copies of the EIA Report may be purchased by arrangement for £1,500 per copy. The price of the hard copy reflects the costs of producing the Landscape and Visual visualisations.

Alternatively, a DVD or USB memory stick containing PDF files of the EIA Report are available for £15 per CD. These PDF files can also be downloaded for free from the Aultmore Wind Farm Redesign website.

A copy of the EIA Report can also be viewed electronically at the following locations:

- Moray Council Planning Portal; and
- ECU Website.



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