Chapter 7: Ecology and Nature Conservation

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Executive Summary

This Ecology and Nature Conservation chapter of the Environmental Impact Assessment ('EIA') Report assesses the likely significant effects of the Proposed Varied Development on non-avian ecological features. The assessment builds on baseline data collected for the Consented Development, supplemented by an updated desk study and targeted updated field surveys to capture any additionally available ecological information.

The assessment considers only effects that may differ between the Consented Development and Proposed Varied Development. Where it is likely that effects to ecological features will be the same between the two developments, these features and impacts are scoped out of the impact assessment for the Proposed Varied Development.

Assessment methods in this chapter mirrored those undertaken in the 2018 EIAR, although updated guidance documents (e.g., CIEEM, 2018) were used.

Baseline field surveys to inform the 2018 EIAR found that habitats were predominantly conifer plantation with peatland habitats in fire breaks in the north of the Site and grassland and peatland habitats in the open areas of the south of the Site. The habitats in the south of the Site were degraded due to livestock grazing pressure and the conifer plantation in the north has resulted in modification and degradation to peatland habitats.

Field surveys to inform the 2018 EIAR indicated limited use of the Site by badgers, but several setts were identified during baseline field surveys. Three static bat detectors were deployed and walked transects were undertaken for bats in 2013, which indicated the activity across the site was generally low. Activity was predominantly common pipistrelle *Pipistrellus pipistrellus* and *soprano pipistrelle Pipistrellus pygmaeus* but *Nyctalus* and *Myotis* calls were also recorded in low numbers. Brown trout Salmo trutta were present in most watercourses surveyed, but densities were generally low. Due to the presence of numerous obstacles, the brown trout population is isolated and migratory species cannot access the watercourses within the Site.

Since consent was granted, additional work has been undertaken which was used to inform this impact assessment:

- A walkover site visit in November 2023 to confirm an area of felled conifer plantation on FLS land. In consultation with FLS, the commercial conifer crop was felled and subsequently restored to peatland. FLS conducted the peatland restoration on behalf of SSER and this area forms part of the HMP;
- additional peat depth surveys within the Site since consent;

- pre-construction survey along the Access Track in September 2024 (WSP, 2024); and
- updated field surveys for bat roosting (ground level tree assessment and daytime bat walkover) and badgers in November and December 2025.

Current national and local planning policies were considered in assessing impacts of the Proposed Varied Development on Important Ecological Features ('IEFs'). Existing documents (e.g., the consented HMP) and mitigation measures were reviewed to determine if they remained appropriate for the Proposed Varied Development and in line with current policies.

The design of the Proposed Varied Development and this impact assessment follows the mitigation hierarchy as described in NPF4 (Scottish Government, 2023). The design of the Consented Development and Proposed Varied Development followed the mitigation hierarchy in that effects to ecologically sensitive areas were avoided where possible and then impacts minimised (e.g., through using existing infrastructure instead of new construction where possible). Where impacts could not be avoided, targeted mitigation measures and compensation were detailed and ecological enhancements provided.

IEFs assessed in the 2018 EIAR included Tangy Loch SSSI, sensitive habitats, bats, otter, badger, pine marten, reptiles and fish. Of these IEFs, sensitive habitats, badger, bats and freshwater fish were identified as IEFs to be taken forward to impact assessment of the Proposed Varied Development, as it was concluded that the effects on the other IEFs would not differ between the Consented Development and Proposed Varied Development. Only those effects that were likely to differ from the Consented Development were assessed, for example, operational impacts on all IEFs apart from bats were not assessed, as it was concluded that effects would not differ from the Consented Development.

The 2018 EIAR did not identify any significant effects on any IEFs, when only embedded mitigation measures were considered. All residual effects were negligible or not significant after targeted mitigation measures were taken into account.

When only embedded mitigation measures were considered, adverse effects on IEFs from the Proposed Varied Development were identified during construction, but none of these were considered to be significant in EIA terms. A significant adverse effect on bats was identified due to collision risk during operation, but this was considered to be negligible after a buffer of at least 50m was applied to all turbines from flight paths, particularly in the conifer plantation.

When targeted mitigation measures were considered, it was concluded that the Proposed Varied Development would result in no significant adverse effects on any IEFs.

The cumulative assessment for the Proposed Varied Development considered four other developments for all IEFs, and an additional four operational wind farms for collision risk effects to bats only. Through the application of embedded and targeted mitigation measures outlined in the EIAs for those developments, it was concluded that there would be no significant cumulative effects for the Proposed Varied Development.

Measures outlined in the Habitat Management Plan for the Proposed Varied Development (**Technical Appendix 7.2**), which were first designed for the Consented Development, including peatland restoration and bat carcass searching, were concluded to be appropriate as targeted mitigation measures for the Proposed Varied Development. Additional peatland restoration beyond what is required for compensation for peatland loss and native broadleaved woodland planting, were considered adequate to deliver biodiversity enhancements **(Technical Appendix 7.1)** for the Proposed Varied Development in line with NPF4.

7.1. Introduction

7.1.1. An assessment of impacts on ecology was previously undertaken for the consented Tangy IV Wind Farm ('the Consented Development') in 2018 in accordance with best practice guidance and methodologies. This assessed a layout consisting of 16 turbines with a maximum tip height of 149.9m.

7.1.2. This chapter considers the potential for the Proposed Varied Development as described in **Chapter 2: Design Iteration and Description of Proposed Varied Development** to result in material changes to the effects identified for the Consented Development.

7.1.3. The assessment is supported by **Figures 7.1 – 7.5** in **Volume 3a**, and **Technical Appendices 7.1** and **7.2** in **Volume 4** of this EIA Report.

7.2. Scope of Assessment

7.2.1. A Scoping Report (**Technical Appendix 3.1: Scoping Report**) for this Section 36C ('S.36C') variation application was submitted in May 2025. This chapter sets out the rationale behind the decision to assess or scope out ecological receptors based on the potential impacts of the Proposed Varied Development. This chapter of the EIA Report assesses only the differences between the Consented and Proposed Varied Developments, and thus when the predicted impacts are expected to be the same for the two developments, no impact assessment is required.

7.2.2. All features scoped out of the 2018 EIAR (habitats of less than local value, terrestrial invertebrates, amphibians, disease transfer (specifically *Phytophthora austrocedrae*) (refer to 2018 EIAR **Volume 1, Chapter 10, paragraphs 10.2.7 – 10.2.9**) are also scoped out of impact assessment for the Proposed Varied Development. As outlined in the Scoping Report (**Technical Appendix 3.1: Scoping Report**), most IEFs included in the impact assessment for the 2018 EIAR are not assessed in this EIA Report, as it was concluded that there would be no differences between the Consented and Proposed Varied developments through successful application of embedded and targeted mitigation measures outlined in the 2018 EIAR (2018 EIAR, **Volume 1, Chapter 10, Section 10.6**). Further details on IEFs scoped in and out are available in **Section 7.7**.

7.2.3. In determining whether to take IEFs forward to impact assessment, this chapter considers the assessment completed for the Consented Development, the ecological baseline collected to support the assessment, further surveys undertaken since the Consented Development was consented, the predicted

effects of the Proposed Varied Development on IEFs and the proposed mitigation to reduce the significance of any effect.

7.2.4. The mitigation included in the Consented Development's S.36 submission has been secured through appropriately worded planning conditions within the S.36 consent. The ecological baseline, consultee comments on the Proposed Varied Development planning conditions associated with IEFs and a summary of the predicted effects of the Consented Development on IEFs are discussed in the following sections of this document.

7.2.5. Further to the above, the scope of the assessment presented in this chapter is to:

- Consider the previously collected ecological baseline information used to support the Consented Development's planning submission. This includes baseline survey information to inform the 2018 EIAR, information within reports delivered by the Environmental Clerk of Works ('EnvCoW') and Ecological Clerk of Works ('ECoW') during access track upgrades in 2024 (WSP, 2024) and 2025, and further surveys undertaken in 2025 to inform this EIAR.
- Identify IEFs where effects of the Proposed Varied Development are predicted to differ from those for the Consented Development. This could include identifying new IEFs not previously assessed for the Consented Development.
- Undertake an assessment of the predicted effects of the Proposed Varied Development on identified IEFs.
- Consider the differences between the Proposed Varied Development and Consented Development and compare the predicted effects of the Consented Development to those of the Proposed Varied Development.
- Consider the appropriateness of the mitigation, compensation and enhancement measures proposed in the 2018 EIAR and the Habitat Management Plan ('HMP') (**Technical Appendix 7.2**) delivered to satisfy planning conditions for the Consented Development to ensure they are in line with current guidelines and that the Proposed Varied Development will deliver significant biodiversity enhancements as required by NPF4 Policy 3(b) Biodiversity.

7.3. Consultations

7.3.1. An EIA Scoping Report (**Technical Appendix 3.1**) was submitted in May 2025 for the Proposed Varied Development and responses from some consultees have been received. A summary of all consultation undertaken for the Proposed Varied Development is summarised in (**Table 7.1**).

7.3.2. The following organisations were consulted on the EIA Scoping Report (**Technical Appendix 3.1**) but did not provide a response:

- Argyll District Salmon Fishery Board;
- Fisheries Management Scotland;
- RPSB Scotland; and
- Scottish Wildlife Trust.

Table 7.1: Summary of consultations undertaken for the Proposed Varied Development

Consultee (Date) Nature of Consultation	Issue Raised	Response/Action Taken
NatureScot **16 June 2025** **Email in response to letter sent by SSER on 11 April 2025**	We note that a significant area of commercial forestry on the site was felled between 2020 and 2023. This represents a change to baseline habitat conditions and may have influenced how species such as…bats use the site. As such, in line with our guidance, we recommend: • Updated bat activity surveys and ecological walkover surveys.	Updated walkover surveys for badgers and bat roosting were undertaken in autumn 2025 (**Figure 7.4**, **Figure 7.5 (Confidential Annex))**. A walkover survey along the Access Track was undertaken in September 2024 for ecological receptors (WSP, 2024). The recommendation for updated bat activity surveys was made after the spring (April – May) season for static deployments (NatureScot, 2021), and therefore a full season of bat activity surveys could not be undertaken in 2025. Static detectors will be deployed in 2026 in line with NatureScot guidelines for onshore wind farms (NatureScot, 2021) to provide an updated baseline of bat activity. The cumulative impact assessment found bat activity to be generally low at other onshore wind farm sites in the vicinity of the Proposed Varied Development. A precautionary approach was taken in the impact assessment using the existing baseline data from the 2018 EIAR (**Section 1.6**).
Argyll and Bute Council (A&BC) **18 August 2025** **EIA Scoping Report**	The following designated sites are located within 10km of the Proposed Varied Development: • Machrihanish Dunes SSSI (0.82km south-west of Site); • Tangy Loch SSSI (adjacent to Site); and	The 2018 EIAR scoped designated sites out of assessment apart from Tangy Loch SSSI, and the resulting assessment concluded no residual significant effects on Tangy Loch SSSI (**2018 EIAR, Volume 1, Chapter 10, Sections 10.4 and 10.7**).

Consultee (Date) Nature of Consultation	Issue Raised	Response/Action Taken
	• Ancient woodland inventory (AWI) woodland (1.5km south-east of Site).	The effect of the Proposed Varied Development on the Tangy Loch SSSI is considered to be the same as for the Consented Development, through application of mitigation measures. Designated sites are shown in **Figure 7.1.**
	The Council considers that the proposed baseline is acceptable, and that the proposed approach to the evaluation and impact assessment methods are acceptable.	Acknowledged.
	The Council are also content with the stated effects that are proposed to be scoped out of the assessment.	Acknowledged ABC's agreement that the IEFs listed in Section 7.5 of the Scoping Report (**Technical Appendix 3.1**) can be scoped out of this EIAR.
	An updated assessment of habitat loss will therefore be scoped into the Proposed Varied Development's EIA, informed by 2024 NVC, peat depth, and peat condition surveys.	Habitat loss calculations were undertaken for the Proposed Varied Development and described in **Section 7.7, Table 7.8**, and **Table 7.9**.
	Updated walkover surveys will also be undertaken to inform the baseline for bats and badgers.	Walkover surveys were undertaken for bats and badgers, as described in **Section 7.7**.
	The EIA will assess potential increased collision risk and barotrauma to bats, with turbine setbacks reviewed in line with current NatureScot guidance.	Collision risk and barotrauma to bat is assessed in **Section 7.7**.
	The layout has been designed to avoid a known badger sett identified in 2023, but potential impacts on badgers during	An assessment of impacts on badgers is presented in **Section 7.7**. Mitigation measures are described in **Section 7.8**.

Consultee (Date) Nature of Consultation	Issue Raised	Response/Action Taken
	construction and operation will be assessed, and mitigation proposed as required.	
NatureScot **8 September 2025** **EIA Scoping Report**	Our advice dated 22 November 2018 included an objection subject to conditions in relation to Tangy Loch Site of Special Scientific Interest ('SSSI'). This advice should be fully taken on board in any schedule of mitigation presented for the new proposal.	On 17 December 2018, the Applicant confirmed that the measures set out in NatureScot's advice dated 22 November 2018 would be incorporated into the CEMP for the Consented Development. These measures were also required in Condition 12 of the 2019 S36 consent. Condition 12 was discharged by Argyll & Bute Council in October 2024. These measures will also be incorporated into the CEMP for the Proposed Varied Development. The location of Borrow Pit E (near Turbine 05) has not changed between the Consented Development and Proposed Varied Development, and therefore no new or changed effects are anticipated. No new effects pathways between the Proposed Varied Development and Tangy Loch were identified, and impacts to the loch were scoped out of impact assessment in the surface water chapter (**Chapter 9: Surface Water, Table 9.4**).
	NPF4 Policy 3 requires that significant biodiversity enhancements are provided, in addition to any proposed mitigation. We recommend these requirements are adopted as part of any future application.	Peatland restoration and woodland planting measures detailed in the HMP (**Technical Appendix 7.2**) for the Consented Development were considered adequate to deliver significant biodiversity enhancements in line with NPF4. Further details are provided in **Paragraph 7.7.16**.

Consultee (Date) Nature of Consultation	Issue Raised	Response/Action Taken
	We recommend that any updated survey and assessment for peatland habitats follows our peatland guidance.	The existing baseline information from the 2018 EIAR was used to inform this impact assessment. It is recognised that Forestry and Land Scotland ('FLS') undertook peatland restoration in 2024 in an area of the Site, which changed the habitat from what was previously mapped (**Figure 7.2**). For this assessment, this area has been mapped using aerial imagery and given a classification of restored peatland to acknowledge the current state. The Applicant has also engaged with FLS to understand the extent and nature of the peatland restoration that was undertaken, which informed this assessment of impacts.
SEPA **8 August 2025** **EIA Scoping Report**	The EIA submission must contain drawings showing groundwater dependent terrestrial ecosystems, overlain with proposed permanent and temporary development.	Please refer to **Figure 7.3**.
	Requests updated NVC survey data.	**Figure 7.2** shows the NVC data from the 2018 EIAR, which have been amended for this EIAR to account for an area of restored peatland within the Site. These results were used in the design for the Proposed Varied Development (**EIAR Chapter 2: Design Iteration and the Proposed Varied Development, Section 2.2**).

7.3.3. Planning conditions relating to ecological receptors were applied to the Consented Development in response to consultation responses from statutory consultees. The Applicant has either prepared and submitted plans or will prepare and submit plans at the appropriate time, to satisfy the pre-commencement elements of these planning conditions, and all relevant planning conditions are considered to be discharged. Where such plans have been approved by ABC and relevant consultees, and where they are relevant to this EIAR, these reports have been included as technical appendices. The relevant planning conditions are summarised in **Table 7.2** along with the corresponding plans. Where relevant, the mitigation contained in the plans has been considered as part of this assessment.

7.3.4. The planning commitments agreed for the Consented Development will be adhered to for the Proposed Varied Development. The Applicant expects that similar conditions may be imposed for the Proposed Varied Development, and any additional mitigation identified through this assessment will be incorporated into updated plans as required.

Table 7.2: Planning conditions for the Consented Development relevant to ecological receptors

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
4. Long Term Forest Plan	To ensure the consented felling and restocking of woodland within the Development 'felling boundary' is carried out in accordance with the UK Forestry Standard.	No felling associated with the Development shall commence until the finalised Long Term Forest Plan ('LTFP'), detailing felling and restocking of the woodland within the development is finalised, submitted to, and approved in writing by, the Scottish Ministers. Unless and until otherwise approved in writing by the Scottish Ministers, the approved LTFP shall be implemented in full.	Felling and restocking of conifer plantation within the Site can affect ecological receptors (e.g., bats, badgers), and so the LTFP was considered in impact assessment. Development of the HMP (**Technical Appendix 7.2**) considered the requirements of the LTFP, as forest to bog restoration was one of the HMP objectives.
9. Wind Turbine Locations and Micro-Siting	For the avoidance of doubt and to take account of local ground conditions, for the protection of amenity.	(2) Unless otherwise agreed with the Planning Authority in consultation with SNH and SEPA, any such micro-siting, permitted by part (1) of this condition, shall not encroach further into any buffer areas identified in respect of water courses, or nature conservation or historic environment interests as set out in Chapter 9 to 13 inclusive of the Environmental Impact Assessment Report. (3) Any such micro-siting shall be carried out under the supervision of the Ecological Clerk of Works ('ECoW') required to be employed pursuant to Condition 24 of this permission and shall be informed by the outcome of the Peat Management Plan required pursuant to Condition 13 and shall avoid areas of deep peat. (4) No later than one month after the date of Final Commissioning an updated site plan showing the final position of all wind turbines, buildings, masts, areas of hardstanding, tracks and associated infrastructure	Micrositing development infrastructure away from sensitive habitats, in consultation with relevant clerks of works, is in the outline Construction Environmental Management Plan ('CEMP') for the 2018 EIAR (**Technical Appendix 3.6e**). It is expected that a similar condition will be imposed on the Proposed Varied Development, and the same mitigation measures and good practice outlined in the 2018 EIAR CEMP will also be included in a CEMP for the Proposed Varied Development.

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
		forming part of the Development shall be submitted to the Planning Authority. The plan shall also specify areas where micrositing has taken place and, for each instance, be accompanied by copies of the ECoW's approval (if applicable).	
10. Decommissioning Method Statement – Tangy I and Tangy II	To ensure that all decommissioning operations are carried out in a manner that minimises their impact on road safety, amenity and the environment, and that the mitigation measures contained in the EIA Report accompanying the application are fully implemented.	No development shall commence until an outline Decommissioning Method Statement (DMS) for the dismantling of the existing 22 wind turbines and their associated infrastructure which form part of the Tangy I and Tangy II developments and any associated ground restoration works as described as a principal operation at Chapter 5.4 of the EIA Report, is submitted for the written approval of the Planning Authority.	It is expected that a similar condition will be imposed on the Proposed Varied Development. A Decommissioning Method Statement will be drafted for the Proposed Varied Development which will include mitigation and protection for ecological receptors. The HMP (**Technical Appendix 7.2**) proposed peatland restoration following decommissioning of Tangy I and II.
12. Construction and Environmental Management Plan	To ensure that all construction operations are carried out in a manner that minimises their impact on road safety, amenity and the environment, and that the mitigation measures contained in the EIA Report accompanying the application, or as otherwise	(1) No development, other than Site Investigatory Works, shall commence until a full site specific Construction and Environmental Management Plan (CEMP) is submitted for the written approval of the Planning Authority in consultation with SEPA and SNH. This shall provide details, mitigation measures and timetabling in respect of the following: (a) Pollution prevention and control measures;	The measures relevant to ecological receptors identified within the CEMP (**Technical Appendix 3.6e**) were carried forward to this chapter to deliver the intended protections during the construction of the Proposed Varied Development.

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
	agreed in respect of SSSI's or other sensitive habitats, are fully implemented.	(c) Arrangements for on-site storage of fuel and other chemicals; (d) SUDS design philosophy including run□off and sediment control measures including measures for the blocking of existing drains, if required; (g) Ecological monitoring over construction period including all necessary pre□construction surveys and a species protection plan to clearly identify measures to minimise risk to water vole, badger, otter, and any other protected mammal species during construction; (i) Post□construction restoration/reinstatement of the working areas; (j) Details of temporary site illumination; (k) Details, following SIWs, of the of site specific mitigation measures based on the Watercourse and Aquatic Habitat Pollution Prevention Measures outlined in Section 10.6.10 of the EIA report; and (m) Details of proposed watercourse crossings and engineering works in water environment vicinities.	

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
13. Peat Management Plan	In the interests of ensuring the conservation of peat resources and the protection of Tangy Loch SSSI.	(1) No development shall commence until a detailed Peat Management Plan, addressing all areas to be disturbed by construction, has been submitted to and approved in writing by the Planning Authority in consultation with SEPA. This shall include: (a) Volumes, depth and location of any peat disturbed; (b) Details of any proposed re□use of the peat within the site, including a plan showing volumes, location and usage; (c) Details of any disposal of peat proposed, including volumes, detailed disposal proposals and details of how peat usage has been limited to undisturbed ground; and (d) Details of storage and handling of excavated peat, including a plan showing proposed storage areas. (2) All works on site must be undertaken in accordance with the approved Peat Management Plan unless otherwise agreed in advance in writing by the Planning Authority.	The measures outlined in this condition will protect sensitive peatland habitats and minimise disturbance. A revised Peat Management Plan ('PMP') is included in this EIAR (**Technical Appendix 8.1**) which takes into account the requirements of this planning condition.
20. Water Quality and Fish Monitoring Programme	To ensure compliance with all commitments made in the Environmental Impact Assessment Report.	(1) No development shall commence until a Water Quality and Fish Monitoring Programme ('WQFMP') has been submitted and approved by the Planning Authority. The WQFMP must take account of the Scottish Government's Marine Scotland Science's response and must include:	The measures in this planning condition are required to protect fish species and their habitats. A WQFMP was developed which takes into account the requirements set out in this planning condition (**Technical Appendix 3.6g**).

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
		(a) Water quality and fish monitoring programme (carried out at least 12 months prior to construction and decommissioning of the existing turbines taking place, during construction and for up to 12 months, after construction is complete, subject to survey results and in agreement with the Planning Authority and Marine Scotland); and (b) Mitigation measures detailed in the Environmental Impact Assessment. (2) Thereafter the WQFMP must be implemented in full and in accordance with the timescales set out in the plan. No changes to the WQFMP shall take place unless they are with prior written approval of the Planning Authority.	
21. Habitat Management Plan	To secure the restoration of peatland.	(1) No development shall commence until a detailed Habitat Management Plan ('HMP') has been submitted to, and approved in writing, by the Planning Authority in consultation with SNH (NatureScot). The HMP shall include measures to secure the restoration of peatland outlined in **Appendix 10.6** of the EIA report. (2) All works on site must be undertaken in accordance with the approved Habitat Management Plan unless otherwise agreed in writing by the Planning Authority and the identified measures shall be implemented in accordance with the methods approved and for the durations identified in the approved HMP.	An outline HMP ('OHMP') was included in the 2018 EIAR (**Volume 4, Appendix 10.6**). This was further developed in 2024 and a revised HMP (**Technical Appendix 7.2**) was delivered for the Consented Development. The suitability of the measures in this HMP have been considered below in the assessment of the Proposed Varied Development.

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
24. Ecological Clerk of Works	No reason given.	(1) No development shall commence until the Planning Authority has approved in writing the terms of appointment by the Company of an independent Ecological Clerk of Works ('ECoW') in consultation with SNH (NatureScot) and SEPA. The terms of appointment shall; (a) Impose a duty to monitor compliance with the ecological and hydrological commitments provided in the EIA Report and other information lodged in support of the application, the Construction and Environmental Management Plan, and other plans approved in terms of Condition 26 ("the ECoW works"); (b) Require the ECoW to report to the Company's nominated construction project manager any incidences of non-compliance with the ECoW works at the earliest practical opportunity; (c) Require the ECoW to submit a monthly report to the Planning Authority summarising works undertaken on site; and (d) Require the ECoW to report to the Planning Authority any serious environmental incidences resulting as a consequence of non-compliance with the ECoW Works at the earliest practical opportunity. (2) The ECoW shall be appointed on the approved terms throughout the period from the Commencement of Development, throughout any period of construction activity and during any period of post construction	The Applicant expects that a similar condition will be imposed on the Proposed Varied Development.

Planning Condition	Reason for the Planning Condition	Clauses Relevant to Ecology	Relevance to Proposed Varied Development EIA
		restoration works approved in terms of conditions 8 and 12.	
25. Environmental Clerk of Works Decommissioning	To secure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development.	No later than 12 months after being directed to decommission the Development, the Company shall submit details of the terms of appointment by the Company of an independent ECoW throughout the decommissioning, restoration and aftercare phases of the Development to the Planning Authority for approval in consultation with SNH (NatureScot) and SEPA. The ECoW shall be appointed on the approved terms throughout the decommissioning, restoration and aftercare phases of the Development.	The Applicant expects that a similar condition will be imposed on the Proposed Varied Development.
26. ECoW Works	In order to safeguard protected species in the interest of nature conservation.	No development shall commence until a pre-construction survey is carried out by the Ecological Clerks of Works ('ECoW'), in respect of the areas to be affected by development work, to establish any presence of otter, water vole, badger and other protected mammal species. In the event of any evidence of such mammals being present, the appropriate licensing process should be concluded prior to continuing works and any measures identified in the Construction Environmental Management Plan ('CEMP') required in terms of condition 12 to safeguard this protected species should be implemented for the duration of construction activities on the site.	A pre-construction survey was proposed in the 2018 EIAR (2018 EIAR **Volume 1, Chapter 10, paragraph 10.6.5**) and the CEMP (**Technical Appendix 3.6e**). The requirement for a pre-construction survey will be carried forward into this assessment as essential ecological mitigation for the construction of the Proposed Varied Development.

Assessment Methodology

Desk and Field Data Collection

7.3.5. Desk and field survey data were used to support the assessment. An updated search for designated sites was undertaken using NatureScot's SiteLink website[1], to provide updated information on statutory and non-statutory designated sites potentially impacted by the Proposed Varied Development.

7.3.6. The results from the following field surveys were used to inform this assessment:

- Baseline habitat and protected species surveys, as detailed in the 2018 EIAR (2018 EIAR **Volume 1, Chapter 10, Section 10.4**) and relevant technical appendices (**Volume 4, Technical Appendix 10.1: Survey Methodology and Detailed Results**, **Technical Appendix 10.2: Bat Survey Analysis**, **Technical Appendix 10.3: Freshwater Invertebrate Results**, **Technical Appendix 10.4: Fish Habitat Survey Report**, **Technical Appendix 10.5: Badger Protection Plan**).
- The findings from a pre-construction ecology survey undertaken in September 2024 in advance of access track upgrades in winter 2024/25 (WSP, 2024).
- Results from a field survey for badger and bat roosting undertaken in 2025 to inform this assessment (**Section 7.7**).

Impact Assessment

7.3.7. The assessment of effects of the Proposed Varied Development follows Chartered Institute of Ecology and Environmental Management ('CIEEM') guidance version 1.3 (CIEEM, 2018). The 2018 EIAR followed the 2016 CIEEM guidance (2018 EIAR **Volume 1, Chapter 10**) which was superseded by the 2018 guidance.

7.3.8. **Table 10.2** of the 2018 EIAR (**Volume 1, Chapter 10**) describes the geographical importance parameters that were used to assign a conservation value to IEFs, ranging from International to Local, which is partly based on inclusion on designated lists or being protected by relevant legislation. CIEEM's current EIA guidance acknowledges the usefulness of designated species lists and legislation in assigning importance but recommends that

[1] https://sitelink.nature.scot/home

other characteristics such as naturalness and replaceability are also considered when assigning a conservation value category.

Embedded Mitigation Measures

7.3.9. Embedded mitigation measures, sometimes referred to as mitigation by design, are those mitigation measures that are inherent within the design of the scheme and are used in the initial impact assessment (CIEEM, 2018).

7.3.10. The Consented Development and Proposed Varied Development were both designed following the mitigation hierarchy (i.e., avoid, minimise, restore, offset (Scottish Government, 2023)) and embedded mitigation measures were designed to avoid and then minimise impacts where possible. Key principles followed during design of the Consented Development and Proposed Varied Development included avoiding sensitive habitats and minimising new habitat loss by reusing existing infrastructure where possible.

7.3.11. Mitigation by design measures were listed in 2018 EIAR **Volume 1, Chapter 10 Section 10.6** and included:

- The layout of the Proposed Varied Development has, where possible, been designed to avoid those habitats of highest ecological value and sensitivity to impacts.
- Existing infrastructure in the Tangy I and II Wind Farms was used where possible for the Proposed Varied Development.
- New turbines and infrastructure were situated outside of areas with potential for high groundwater dependence, where possible, with most located in coniferous plantation in the north of the Site.
- M6 NVC communities, which have potential to be groundwater dependent (SEPA, 2024), were avoided as much as possible along the forest firebreak in the east of the Site.
- The design avoided areas of deep peat where possible.
- Where peat depth exceeds 1m, track construction will be of a floating design rather than a cut track.
- Infrastructure and turbines situated in the conifer plantation in the north of the Site avoided deep peat where possible.

7.4. Consented Development EIAR Baseline

7.4.1. The Site of the Consented Development is situated on the west cost of the Kintyre Peninsula in Argyll and Bute, approximately 9 km north-west of Campbeltown. At the time consent was granted, the Site had a mixed land use, including agriculture commercial forestry, pastoral agriculture and renewable energy generation. Several minor watercourses are present in the Site and Tangy Loch is present to the east of the Site.

7.4.2. 2018 EIAR **Volume 1, Chapter 10** considered the potential effects of construction, operation and decommissioning of the Consented Development on ecological features present within the Site plus appropriate buffers. Baseline information on designated sites, protected species and habitats was collected through a combination of desk-based assessments and field surveys. Full details of the surveys and results are presented in 2018 EIAR **Volume 1, Chapter 10** and technical appendices, and only a summary of findings for IEFs scoped into this assessment are presented below.

7.4.3. Embedded mitigation, bespoke compensation and targeted mitigation measures were proposed following best practice guidelines at the time. Further management plans (e.g., Badger Protection Plan, HMP (**Technical Appendix 7.2**)) have been approved by A&BC, in consultation with NatureScot, to satisfy relevant planning conditions for the Consented Development. These plans detail some of the compensation and mitigation measures designed to protect ecological features.

Habitats

7.4.4. Habitat mapping for the Consented Development was undertaken between April and June 2013 (2018 EIAR, **Volume 1, Chapter 10, Appendix 10.1: Survey Methodology and Detailed Results**). Phase 1 habitats were mapped across the Site to identify the broad habitats present, which included coniferous plantation, marshy grassland, improved grassland and wet modified bog (2018 EIAR, **Volume 1, Chapter 10, Figure 10.2**). Where applicable, NVC communities were described within the Site, and those with potential groundwater dependency (based on the NVC community and SEPA's guidance at the time) were identified (**Table 7.3**).

7.4.5. At the time of consent, most of the north of the Site was coniferous plantation woodland with heathland and bog habitats present within fire breaks (2018 EIAR, **Volume 1, Chapter 10, Figure 10.2**). Much of the south of the Site, where the existing Tangy I and II Wind Farms are situated, was marshy grassland, improved grassland, wet modified bog and blanket bog. The blanket bog and wet modified bog habitats in the south of the site were associated with NVC communities M16, M16d, M19, M20 and M25 (2018 EIAR, **Volume 1, Chapter 10, Figure 10.3** and **Table 10.6**). Marshy grassland

was prevalent across the south of the Site and was associated with the NVC community M23, which had high potential to be a GWDTE, based on SEPA's 2018 guidance (2018 EIAR, **Volume 1, Chapter 10, Figure 10.2** and **Figure 10.3**). However, the M23 habitat in the Site was largely a species poor wet grassland due to grazing pressures and the 2018 EIAR concluded it was of low importance. Improved grassland was also prevalent across the south of the Site, which was noted as being impacted by grazing pressures.

7.4.6. The 2018 EIAR concluded that all of the habitats within the Site were of local or lower value. NVC communities indicative of peatlands were present within the Site (e.g., M15, M16, M19), and although peatland habitats are typically assessed as being of greater than local value, these habitats were concluded to be of local value due to degradation and modification due to afforestation, artificial drainage and livestock grazing pressure.

Badger

7.4.7. Two outlier badger setts, one with three active entrances, the other with a single inactive entrance approximately 50 m to the south of the active sett, were present within the Site (2018 EIAR, **Volume 3a, confidential Figure 10.9: Badger Sett**).

Bats

7.4.8. Analysis of the three static bat detectors confirmed the presence of common pipistrelle and soprano pipistrelle, *Nyctalus species* (probable to be Leisler's bat *Nyctalus leisleri*) and Myotis species (likely to be Daubenton's bat *Myotis daubentoniid*) (2018 EIAR, **Volume 1, Chapter 10** and 2018 EIAR, **Volume 4, Appendix 10.2**). Overall bat activity within the Site was low, with the highest abundances recorded along the broadleaved woodland to the south of the Site and by Tangy Loch.

Freshwater fish (Tangy Burn catchment only)

7.4.9. Numerous obstacles to fish migration were present in the Tangy Burn catchment, including several downstream of the Site boundary which would prevent migratory species such as Atlantic salmon Salmo salar, sea trout S. trutta, sea lamprey Petromyzon marinus, river lamprey Lampetra fluviatilis and European eel Anguilla anguilla, from migrating into the Site boundary (2018 EIAR, **Volume 4, Appendix 10.4**).

7.4.10. Electrofishing surveys were undertaken at eight locations in the Tangy Burn catchment, three on Tangy Burn, one on Allt Trasda (a tributary to Tangy Loch) and four on two unnamed tributaries to Tangy Burn) (2018 EIAR, **Volume 4, Appendix 10.4**). Brown trout; either fry, parr or both; were present

in all the surveyed watercourses but densities were much lower in the tributaries and Allt Trasda than in Tangy Burn. Targeted spot checks for larval lamprey were undertaken but none were collected.

7.5. Summary of Effects Predicted & Mitigation Measures proposed for the Consented Development

7.5.1. The 2018 EIAR identified not significant, but adverse effects on habitats and bats in the absence of mitigation (apart from mitigation by design) (**Table 7.3**). Beneficial, but not significant, effects (in the absence of targeted mitigation) were identified for habitats during operation and decommissioning. Targeted mitigation measures include the CEMP and ECoW to protect habitats and species and the HMP which outlines habitat restoration during operation. After considering targeted mitigation, all residual effects were not significant.

Table 7.3: Summary of impact assessment for the Consented Development from the 2018 EIAR

Important Ecological Feature	Predicted Effect	Significance	Targeted Mitigation	Significance of Residual Effect
Construction				
Habitats, including GWDTE	Habitat loss or modification/degradation	Adverse but not significant	Avoidance of sensitive habitats, micro-siting, reduction of impacts on GWDTEs, as outlined in the CEMP (2018 EIAR, **Volume 4, Appendix 5.1**).	Not significant
Badger	Disturbance	Not significant	Pre-construction protected species survey and badger protection plan to minimise disturbance to setts, overseen by the ECoW.	Not significant
Bat species	Loss of foraging habitat	Adverse but not significant	n/a	Not significant
Freshwater fish	Habitat degradation or destruction due to pollution incidents	Adverse but not significant	Watercourses buffered where possible and pollution response spill kits and silt mitigation measures in place at all watercourse crossings,	Not significant

Important Ecological Feature	Predicted Effect	Significance	Targeted Mitigation	Significance of Residual Effect
			as detailed in the CEMP (2018 EIAR, **Volume 4, Appendix 5.1**).	
Operation				
Habitats	Habitat restoration and creation	Significant beneficial effect	Restoration of 27.7 ha of peatland habitat and the creation of 3.53 ha of native broadleaved woodland, per the outline HMP (2018 EIAR, **Volume 4, Appendix 10.6**).	Significant beneficial effect
Badger	New foraging areas produced from removal of coniferous plantation	Beneficial but not significant	n/a	Beneficial but not significant
Bat species	Mortality from collision or barotrauma and disturbance or displacement	Not significant	Maintenance of an 87m buffer between forestry replanting and turbines. Compensatory planting would also include areas of increased biodiversity with the planting of broadleaved species. Compensatory planting could provide new foraging and commuting areas, per the outline HMP (2018 EIAR, **Volume 4, Appendix 10.6**).	Not significant, potential for beneficial effect from compensatory planting
Freshwater fish	Habitat degradation or destruction due to pollution incidents	Adverse but not significant	Runoff control measures (e.g., interceptor drains) will be in place to divert surface runoff away from watercourses.	No residual effects
Decommissioning				

Important Ecological Feature	Predicted Effect	Significance	Targeted Mitigation	Significance of Residual Effect
Habitats	Habitat reinstatement	Not significant	Regeneration of habitats following removal of wind farm infrastructure and access tracks, per the CEMP delivered for decommissioning.	Not significant

7.6. Revised Assessment of Effects for the Proposed Varied Development

7.6.1. In line with relevant guidance (e.g., Scottish Government, 2019; NatureScot, 2024b), this impact assessment focusses only on those effects that are likely to differ between the Consented Development and the Proposed Varied Development. The identification of IEFs to take forward for impact assessment considered the differences between the two layouts, including proposed turbine dimensions, as well as the suitability of the embedded mitigation (i.e., mitigation by design) in the 2018 EIAR and targeted compensation and enhancement measures (as outlined in the HMP, **Technical Appendix 7.2**) included in the 2018 EIAR for the Proposed Varied Development.

7.6.2. Eight IEFs were taken forward for impact assessment in the 2018 EIAR, however four of those were scoped out of this EIAR as the impacts were concluded to not differ between the Consented Development and Proposed Varied Development (**Table 7.4**). The decision to scope other protected species and the Tangy Loch SSSI out of impact assessment is based on field survey results used to support the 2018 EIAR and subsequent surveys undertaken since consent was granted. Although some of these results are now considered out of date, NatureScot guidance states that existing survey data can normally be relied upon and new surveys are only recommended when the variation is likely to have substantial changes that could result in new or intensified effects, which is not considered to be the case for the Proposed Varied Development (NatureScot, 2024b).

7.6.3. Considering the above, the IEFs taken forward for this impact assessment were (**Table 7.4**):

- sensitive habitats, including potential GWDTEs;
- badger;
- bats; and
- freshwater fish.

Table 7.4: Summary of IEFs scoped into and out of impact assessment for the Proposed Varied Development

2018 EIAR IEF	Scoped In/Out of Impact Assessment for PVD	Justification
Habitats (M5/W23/MG1, M6, M6c, M15, M15/M25/W2, M15/W23/MG10, M16, M16a, M16d, M19, M20, M23, M23/M25, M23/M15, M25, MG10, MG9, MG9/MG10, U4/M15 and U4)	In	Increased size of hardstandings and other changes to site infrastructure could impact sensitive habitats differently from the Consented Development.
Bat species	In	Larger turbines could impact bat species differently, particularly in terms of collision risk.
Badger	In	A larger infrastructure footprint could impact badgers and their habitats differently than the Consented Development.
Fish species (brown trout)	In	A new watercourse crossing along the access track could impact fish and their habitats differently than for the Consented Development.
Tangy Loch SSSI	Out	Both the Consented Development and the Proposed Varied Development are hydrologically connected to this Site, however the Proposed Varied Development is not expected to give rise to different effects than the Consented Development. Tangy Loch and its tributaries were also scoped out of impact assessment in **Chapter 9: Surface Water** as no new impacts were identified.
Otter	Out	Differences between watercourse crossings for the Proposed Varied Development and Consented Development are minor and are not expected to result in differences in the overall effect to otters. Embedded mitigation measures (e.g., pre-construction survey, **Section 7.8**) will identify any resting places that may be impacted by the construction of the Proposed Varied Development.

2018 EIAR IEF	Scoped In/Out of Impact Assessment for PVD	Justification
Pine marten	Out	The baseline surveys for the Consented Development identify one scat in the coniferous plantation woodland and no dens (2018 EIAR **Volume 1, Chapter 10, Figure 10.8**) and concluded that the effect of habitat loss would be of low magnitude and not significant. These conclusions remain valid for the Proposed Varied Development.
Reptiles (common lizard)	Out	Only construction effects were identified for reptiles in the 2018 EIAR (2018 EIAR **Volume 1, Chapter 10, paragraph 10.5.13**). Through application of mitigation measures outlined in the 2018 EIAR, the construction effects of the Proposed Varied Development are concluded to be the same as for the Consented Development.

7.6.4. A pre-construction survey was undertaken in 2024 along the Access Track for the Proposed Varied Development and site visits were undertaken within the HMP area in 2024 (**Technical Appendix 7.2**). The results of these surveys did not indicate that the distribution of otters, water vole, pine marten, reptiles is likely to have changed since the surveys in 2013. In 2024, an area of forest to bog peatland restoration was undertaken within the commercial conifer plantation **(Figure 7.3**).

7.6.5. Some of the infrastructure for the Proposed Varied Development has moved or changed in size compared to the Consented Development, and there is a potential that these changes could impact otters, water vole, pine marten or reptiles differently than what was assessed in the 2018 EIAR. However, it was concluded that the overall effects are unlikely to differ between the two developments for the following receptors:

- **Otter and water vole**: One additional watercourse crossing is proposed for the Proposed Varied Development's access track. This watercourse was surveyed during the pre-construction survey for access track upgrades in 2024 and was identified as commuting and foraging habitat for otter, with no resting sites identified, and no habitat for water vole was identified in this area (WSP, 2024). There is a potential for construction impacts to otters, however through the application of embedded and targeted mitigation outlined in the 2018 EIAR, it is concluded that the

impacts of the Proposed Varied Development will not differ from those in the 2018 EIAR.

- **Pine marten**: The felling of the conifer plantation for the purposes of peatland restoration reduced the amount of woodland habitat within the Site available for pine marten. The 2018 EIAR concluded that pine marten use of the Site was low based on few field signs being recorded, and there have been no changes to the Site since consent which would indicate that pine marten use of the Site hasn't changed. Considering this, the effects of the Proposed Varied Development are considered to be the same as the Consented Development.
- **Reptiles**: The 2018 EIAR identified construction impacts to reptiles (e.g., disturbance, injury, mortality) and temporary and permanent loss of habitat and concluded that the magnitude would be low and not significant. These effects are not expected to differ between the Consented Development and Proposed Varied Development.

Updated Baseline for IEFs

7.6.6. The survey results that informed the 2018 EIAR were used in this impact assessment, in line with NatureScot guidance (NatureScot, 2024b), as well as the findings of surveys undertaken since consent was granted.

7.6.7. Since consent, the following survey work has been undertaken at the Site which updates the baseline conditions for IEFs:

- September 2024: A pre-construction survey was undertaken along the Access Track leading into the Site (WSP, 2024) which found:
  - Four trees and four buildings within 30 m of the Access Track with potential roost features (**Figure 7.4b**). Of these, TN7 and TN9 are in occupied houses and TN10 is in the main farmhouse. Therefore, any bats roosting in these buildings are likely to have a high disturbance threshold (WSP, 2024).
  - No field signs for badger were recorded during the survey.
- November and December 2025: Walkover field survey of the Site for badgers and a roost assessment (ground-level tree assessment and daytime bat walkover; Collins, 2023) for bats. Results of these surveys include:
  - Five trees and seven buildings were identified within the Site which had potential to support roosting bats (**Figure 7.4a**). Six of these buildings, including three with Moderate roosting potential, are the

control buildings for the Tangy I and II Wind Farms and their 30m disturbance buffers overlap with the west of the proposed Site Compound and its access track.

- Field signs for badgers were recorded which included dung pits, droppings, a mammal path and three potential setts (**Confidential Annex, Figure 7.5**):
  - Sett A: Potential three-entrance sett also recorded during surveys in 2013, 2018 and 2023 (**Technical Appendix 3.6h**, **Confidential Annex, Figure 7.5**). The entrance appeared part used during the survey in 2025 but no field signs indicating current use (e.g., guard hairs, recent digging) were observed. No badgers were recorded during camera monitoring of all three entrances over 24 nights (13 November 2025 – 8 December 2025).
  - Sett B: Potential one-entrance sett also recorded during surveys in 2013, 2018 and 2023 (**Technical Appendix 3.6h**, **Confidential Annex, Figure 7.5**). During the 2025 survey, this sett appeared partly collapsed, the entrance was partly blocked with forest litter and no field signs indicating current use were observed. No badgers were recorded during camera monitoring of the entrance over 24 nights.
  - Sett C: Active one-entrance sett not identified during field surveys to support the 2018 EIAR but recorded during surveys in 2023 with signs of recent activity including guard hairs, fresh digging and dung pits (**Technical Appendix 3.6h**, **Confidential Annex, Figure 7.5**). No field signs of recent activity (e.g., fresh digging, guard hairs, dung pits) were observed in 2025 but a maximum of two badgers were recorded using the sett on three nights over the 24 nights of camera monitoring.

7.6.8. The peat depth surveys undertaken to support the 2018 EIAR were used to inform this assessment. Since consent, further peat depth surveys have been undertaken at various locations across the Site to provide additional, detailed information for use in designing the Proposed Varied Development (**Figures 2.12a-p**). The design of the Proposed Varied Development was influenced by the updated survey results and areas of deep peat were avoided where possible, including amending the access track route. A micrositing allowance of 50m is included in mitigation for the Proposed Varied Development which will allow for infrastructure locations to be further refined during construction

and the Peat Management Plan (**Chapter 8, Appendix 8.1**) presents further measures related to peat.

7.6.9. The original NVC and Phase 1 survey results from the 2018 EIAR were used in the impact assessment for the Proposed Varied Development, as the land use across most of the Site has not changed. A site visit was undertaken in December 2023 to inform development of the HMP for the Consented Development (**Technical Appendix 7.2**). During this visit, walkover notes were collected from an area of conifer plantation (on peat) that had been felled and a portion subsequently restored to peatland in a collaborative effort between SSER and FLS. Restoration activities included blocking drainage ditches through stump flipping and ground smoothing. Existing peatland habitats in fire breaks were left intact. To reflect these changes, the 2018 NVC habitat mapping has been updated with a Restored Peatland category to represent the area recently restored and the remainder of the area was reclassified as A4.2 – felled coniferous woodland (**Figure 7.2**).

7.6.10. Coniferous plantation woodland (excluding felled) made up 44% of the Site and felled coniferous plantation woodland made up an additional 12.99% of the Site (**Figure 7.2**, **Table 7.5**). Restored Peatland, which in the 2018 EIAR was mostly coniferous plantation woodland, made up 9.11% of the Site. The next most prevalent habitat within the Site was M23 grassland, which was present across much of the existing Tangy I and Tangy II Wind Farms and made up 9.76% of the Site. The 2018 EIAR describes this M23 grassland as a species-poor wet grassland due to high grazing pressure and therefore concluded to be of low ecological value (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.4.8**).

7.6.11. NVC communities present within the Site that have the potential to be priority peatlands (NatureScot, 2026) include M15, M19, M20 on all soils and M15, M16 and M25 on peat >0.5 m deep, and mosaics including these communities (Figure 7.2). Many of these NVC communities were present amongst the fire breaks in the conifer plantation in the north of the Site, which generally had deeper peat than in the south of the Site (**Figure 8.6**) but larger areas of M16

(and sub-communities), M19, M20 and M25 were present in the south of the site where peat depths were more variable.

7.6.12. The NVC communities associated with peatlands were classified as blanket bog, wet modified bog and wet heath in the 2018 EIAR (**Volume 1, Chapter 10, Figure 10.2**).

Table 7.5: Habitats within the Proposed Varied Development Site. All habitats are NVC communities unless otherwise noted

Habitat Code	Description	Potential GWDTE	Area (ha)	% Site
H12	*Calluna vulgaris-Vaccinium myrtillus* heath	No	9.56	1.37
M5/W23/MG1	*Carex rostrata-Sphagnum squarrosum* mire / *Ulex europaeus-Rubus fruticosus* scrub / *Arrhenatherum elatius* grassland	Yes	0.11	0.02
M6	*Carex echinata-Sphagnum recurvum* / *auriculatum* mire	Yes	0.07	0.01
M6c	*Carex echinata-Sphagnum recurvum* / *auriculatum* mire, *Juncus effusus* sub-community	Yes	0.16	0.02
M15	*Scirpus cespitosus-Erica tetralix* wet heath	Yes	6.03	0.86
M15 (priority peatland)	Priority peatland when on peat >0.5 m deep		6.38	0.91
M15/M25/W2	*Scirpus cespitosus-Erica tetralix* wet heath / *Molinia caerulea-Potentilla erecta* mire / *Salix cinerea-Betula pubescens-Phragmites australis* woodland	Yes	0.07	0.01
M15/M25/W2 (priority peatland)	Priority peatland when on peat >0.5 m deep		0.05	0.01
M15/W23/MG	*Scirpus cespitosus-Erica tetralix* wet heath / *Ulex europaeus-Rubus fruticosus* scrub / MG grassland	Yes	0.06	0.01
M15/W23/MG (priority peatland)	Priority peatland when on peat >0.5 m deep		0.08	0.01

Habitat Code	Description	Potential GWDTE	Area (ha)	% Site
M16	*Erica tetralix-Sphagnum compactum* wet heath	Yes	0.79	0.11
M16 (priority peatland)	Priority peatland when on peat >0.5 m deep		0.28	0.04
M16a	*Erica tetralix-Sphagnum compactum* wet heath, typical sub-community	Yes	2.14	0.31
M16a (priority peatland)	Priority peatland when on peat >0.5 m deep		2.42	0.35
M16d	*Erica tetralix-Sphagnum compactum* wet heath, *Juncus squarrosus-Dicranum scoparium* sub-community	Yes	5.91	0.85
M19	*Calluna vulgaris-Eriophorum vaginatum* blanket mire	No	13.17	1.88
M20	*Eriophorum vaginatum* blanket and raised mire	No	25.02	3.58
M23	*Juncus effusus* / *acutiflorus-Galium palustre* rush-pasture	Yes	68.17	9.76
M23/M15	*Juncus effusus* / *acutiflorus-Galium palustre* rush-pasture / *Scirpus cespitosus-Erica tetralix* wet heath	Yes	0.01	0
M23/M15 (priority peatland)	Priority peatland when on peat >0.5 m deep		0.41	0.06
M23/M25	*Juncus effusus* / *acutiflorus-Galium palustre* rush-pasture / *Molinia caerulea-Potentilla erecta* mire	Yes	0.2	0.03
M23/M25 (priority peatland)	Priority peatland when on peat >0.5 m deep		0.03	0
M25		No	5.07	0.73

Habitat Code	Description	Potential GWDTE	Area (ha)	% Site
M25 (priority peatland)	*Molinia caerulea-Potentilla erecta* mire Priority peatland when on peat >0.5 m deep		6.76	0.97
Restored Peatland	Former conifer plantation restored to peatland	No	63.68	9.11
MG7	*Lolium perenne* leys and related grasslands	No	45.24	6.47
MG9	*Holcus lanatus-Deschampsia cespitosa* grassland	Yes	0.83	0.12
MG9/MG10	*Holcus lanatus-Deschampsia cespitosa* grassland / *Holcus lanatus-Juncus effusus* rush-pasture	Yes	1.46	0.21
MG10	*Holcus lanatus-Juncus effusus* rush-pasture	Yes	9.27	1.33
P1 - A1.1.2	Phase 1 habitat: broadleaved plantation	No	0.92	0.13
P1 - A1.2.2	Phase 1 habitat: coniferous plantation	No	308.09	44.09
P1 - A4.2	Phase 1 habitat: felled coniferous woodland	No	90.76	12.98
P1 - B1.2	Phase 1 habitat: semi-improved acid grassland	No	2.25	0.32
P1 - B2.2	Phase 1 habitat: semi-improved neutral grassland	No	<0.01	<0.01
P1 - I2.1	Phase 1 habitat: quarry	No	0.1	0.01
P1-J4	Phase 1 habitat: bare ground	No	5.1	0.73
U4	*Festuca ovina-Agrostis capillaris-Galium saxatile* grassland	No	12.7	1.82

Habitat Code	Description	Potential GWDTE	Area (ha)	% Site
U4/M15	*Festuca ovina-Agrostis capillaris-Galium saxatile* grassland / *Scirpus cespitosus-Erica tetralix* wet heath	No	0.57	0.08
U20	*Pteridium aquilinum-Galium saxatile* community	No	0.04	0.01
W23	*Ulex europaeus-Rubus fruticosus* scrub	No	4.75	0.69
Total			**698.71**	**100**

Conservation Value of IEFs

Sensitive Habitats

7.6.13. Sensitive habitats present within the Site consist of the Phase 1 habitats blanket bog and wet modified bog (NVC communities M16, M19, M20, M25), acid/neutral flush/spring (NVC communities M6, M6c) wet heath (NVC communities M15, M16a, M16d, M5/W23/MG1, M15/M25/W2, M15/W23/MG10, M23/M15, MG10) and Restored Peatland (**Figure 7.2**).

7.6.14. Blanket bog and wet modified bog (NVC communities M16, M19, M20, M25) were present in the south of the Site as well as within the fire breaks in the conifer plantation in the north of the Site (**Figure 7.2**). Blanket bog and wet modified bog are listed in Annex 1 of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') and are listed on the Argyll and Bute Biodiversity Action Plan ('BAP') (Argyll and Bute Council, undated). No local, national or international designated sites classified for blanket bog were present within the Site or a 10 km buffer (**Figure 7.1**). As with other peatland habitats within the Site, the bog habitats were degraded due to livestock grazing (and associated drainage), and afforestation.

7.6.15. Two areas of wet heath (NVC communities M15, M16a, M16d, M5/W23/MG1, M15/M25/W2, M15/W23/MG10, M23/M15, MG10) were present in the south of the Site as well as among fire breaks in the conifer plantation (**Figure 7.2**).

This is a key habitat type identified on the ABC BAP (Argyll and Bute Council, undated).

7.6.16. Two small areas of acid/neutral flush/spring (NVC communities M6 and M6c) are present in fire breaks in the conifer plantation (**Figure 7.2**). These habitats are considered highly sensitive within the Site (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.6.2**).

7.6.17. A section of the habitat classified as conifer plantation in the 2018 EIAR was felled in 2023 and restored to peatland in 2024 and is reclassified in this EIA Report as Restored Peatland (63.68 ha, **Figure 7.2**), to acknowledge the restoration activities recently undertaken. Restoration activities included stump flipping and ground smoothing which initially creates a landscape that appears intensively worked with little vegetation. During surveys in 2025 this area was observed to be revegetated, but brash and mulched trees were still visible and it did not yet resemble a high-quality peatland habitat. Peatland habitats are often considered to be of high ecological value, however the habitats within the Site were noted in the 2018 EIAR as being degraded and modified by grazing and afforestation (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.4.9**).

7.6.18. Potential GWDTEs are assessed with sensitive habitats to follow the approach taken in the 2018 EIAR and to account for the overlap between many potential GWDTEs and sensitive habitats. Habitats that were potential GWDTEs, based on current guidance (SEPA, 2024) were mainly associated with M23 communities (*Juncus effusus/J. acutiflorius – Galium palustre* rush-pasture) across the south of the Site but were also present amongst the fire breaks in the conifer plantation (**Figure 7.3**). The hydrological and hydrogeological assessment of the Site undertaken for the 2018 EIAR concluded that conditions to support GWDTEs are limited to isolated areas and not extensive across the Site (2018 EIAR, **Volume 1, Chapter 11, paragraph 11.4.20**).

7.6.19. Based on the NVC communities present, some of the habitats present have the potential to be priority peatland habitats, based on their biodiversity value and conservation status (NatureScot, 2026). The Restored Peatland is also considered as a priority peatland habitat, as the purpose of the restoration was to reinstate functioning hydrology capable of supporting high quality peatland communities.

7.6.20. Considering the international importance of bog communities and peatland habitats and taking into account the modified and degraded condition of the habitats within the Site, the limited extent of conditions to support GWDTEs, but also the restoration potential for these habitats and their irreplaceable nature, sensitive habitats are concluded to be of **regional importance** with respect to the Proposed Varied Development.

Badgers

7.6.21. Badgers and their resting places are protected under the Protection of Badgers Act 1992, however badgers are generally widespread across the UK and not considered to be a species of conservation concern (NatureScot, 2024a). Badger activity was present within the Site but was generally low, and the setts observed during field surveys were not considered to be main setts, as two were inactive with one or three entrances and the third, one-entrance sett, was active, but camera monitoring suggested it was not in continuous use. Based on this, badgers are considered to be of **local conservation value**, with respect to the Proposed Varied Development.

Bats

7.6.22. All bat species in Scotland are European Protected Species and receive full protection under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) and are listed on the Argyll & Bute BAP (Argyll & Bute Council, undated). Overall bat activity was low across the Site and soprano and common pipistrelle were confirmed as present as were *Myotis* and *Nyctalus* species (not identified to species level, but the 2018 EIAR reported that the probable species were Daubenton's bat and Leisler's bat) (2018 EIAR, **Volume 4, Appendix 10.2**).

7.6.23. Since consent was granted in 2019, NatureScot's guidance about bat surveys has changed. Current guidance recommends that 12 static bat detectors are deployed for a 16-turbine development (NatureScot, 2021), whereas only three static bat detectors were deployed to inform the 2018 EIAR (2018 EIAR, **Volume 4, Appendix 10.1**). Some *Myotis* and *Nyctalus* species are of high vulnerability to impacts from onshore wind developments (NatureScot, 2021) and given the uncertainty around which species were present, a precautionary approach is taken in assigning conservation value. Following the scoring system for southern Scotland presented in **Table 3.3** in CIEEM's UK Bat Mitigation Guidelines (Reason and Wray, 2025), a total score of 12 was assigned for the Proposed Varied Development, which indicates that the population is of Regional importance. Given that fewer bat detectors were deployed than what meets current guidelines, a precautionary approach is taken and bats are considered to be of **regional conservation value**, with respect to the Proposed Varied Development.

Freshwater fish

7.6.24. Resident brown trout (not migratory sea trout) was the only fish species recorded in the watercourses surveyed for the 2018 EIAR (**Volume 4, Appendix 10.4**). Brown trout are included on the UK Biodiversity Action Plan (UK BAP, UK Government, 1994) as well as the Scottish Biodiversity List (SBL; Scottish Government, 2025) and the Argyll and Bute BAP (Argyll & Bute

Council, undated). Brown trout are widespread across Scotland and therefore are considered to be of **local conservation value**, with respect to the Proposed Varied Development.

Table 7.6: Summary of conservation value for IEFs taken forward for impact assessment

IEF	Conservation Value	Justification
Sensitive habitats, including potential GWDTEs (M5/W23/MG1, M6, M6c, M15, M15/M25/W2, M15/W23/MG10, M16, M16a, M16d, M19, M20, M23, M23/M25, M23/M15, M25, MG9, MG10, MG9/MG10, U4/M15, Restored Peatland)	Regional	These habitats include peatland habitats (e.g., M6, M19, M20), wet heath (e.g., M15, M16) and habitats with potential groundwater dependency (SEPA, 2024). Priority peatland habitats are assessed alongside other sensitive communities.
Badger	Local	Few field signs were recorded, and no main setts. Badgers are not considered to be of conservation concern in Scotland.
Bats	Regional	The existing dataset includes *Myotis* and *Nyctalus* bats, and some of these species are highly vulnerable to impacts from onshore wind farms. Although low activity was recorded, the survey effort to support the 2018 EIAR was lower than what would meet current guidelines and so a precautionary approach was taken for this assessment.
Brown trout (resident)	Local	Resident brown trout are listed on the UK BAP and the SBL as well as the Argyll & Bute BAP and are widespread across Scotland. Brown trout fry and/or parr were present in watercourses across the Site during surveys for the 2018 EIAR and spawning habitat was recorded in Tangy Burn (**Volume 4, Appendix 10.4**).

Construction Effects

Sensitive Habitats

7.6.25. Construction activities are expected to result in habitat loss and modification due to plant movements, excavations and construction of permanent

infrastructure. Habitats could also be degraded as a result of pollution incidents.

7.6.26. To assess the impact of habitat loss and modification during construction, the following parameters were calculated:

- **Permanent, direct habitat loss** (**Table 7.7**): Habitats that would be permanently lost beneath the footprint of the Proposed Varied Development. This includes the habitats associated with the footprints of:
  - 16 hardstandings;
  - six turning heads;
  - one substation compound;
  - three permanent met masts; and
  - 5.5m wide access tracks (4.5m load bearing plus 0.5m shoulder to either side).
- **Temporary, direct habitat loss** (**Table 7.7**): Habitats that would be restored following construction of the Proposed Varied Development. This includes the habitats associated with the footprints of:
  - four borrow pit search areas;
  - four borrow pit working areas;
  - one proposed laydown area;
  - three crane pads for proposed met masts; and
  - one construction compound.
- **Permanent, indirect habitat loss/modification** (**Table 7.8**): Habitats within a 10m buffer around the areas of permanent, direct habitat loss. This represents a worst-case scenario of permanent impacts to habitats during operation of the Proposed Varied Development.
- **Temporary, indirect habitat loss** (**Table 7.8**): A 4m buffer around all infrastructure (temporary and permanent) to account for operation of plant outside of the direct footprint. This buffer will be reinstated following construction in line with the final CEMP.

7.6.27. The iterative design process for the Proposed Varied Development sought to minimise habitat loss and avoid sensitive habitats where possible. For example, the Consented Development permitted an access track running through the centre of the wind farm. This track served as the main internal route, providing access to turbines 15 and 16 and to the northern part of the Site. The design review revisited the central spine track as it crossed areas of deeper peat, leading to direct loss of peat and, crucially, disrupting the hydrological connectivity of the central peat body. Therefore, the access track

layout has been redesigned to route around the central peat area, maintaining access to all turbines without crossing deep peat.

7.6.28. However, some permanent and temporary loss of sensitive habitat will still occur (**Table 7.7**). The design of the Proposed Varied Development was based on the Consented Development, which also sought to avoid sensitive habitats where possible, based on results from Phase 1, NVC and peat depth surveys.

Table 7.7: Summary of direct loss of sensitive habitats

Habitat	Total area of habitat within Site (ha)	Permanent, direct loss (ha)	Temporary, direct loss (ha)	Total Area Affected (ha)	% of relevant habitat within Site affected
Priority Peatlands					
M15 (on peat >0.5 m)	6.38	0.03	0.08	0.11	1.72
M16a (on peat >0.5 m)	2.42	0	0	0	0
M19	13.17	0.21	1.33	1.54	11.69
M20	25.02	0.85	0	0.85	3.4
M23/M15 (on peat >0.5 m)	0.41	0.01	0	0.01	2.44
M25 (on peat >0.5 m)	6.76	0.04	0	0.04	0.59
P1- Restored Peatland	63.68	1.65	0	1.65	2.59
Other sensitive habitats					
M15 (on peat ≤0.5 m)	6.03	0.0015	0.0768	0.0783	1.3
M16	1.07	1.07	0	1.07	100
M16a (on peat ≤0.5 m)	2.14	0	0.09	0.09	4.21

Habitat	Total area of habitat within Site (ha)	Permanent, direct loss (ha)	Temporary, direct loss (ha)	Total Area Affected (ha)	% of relevant habitat within Site affected
M23	68.17	2.75	2.33	5.08	7.45
M23/M15 (on peat ≤0.5 m)	0.01	0	0	0	0
MG10	9.27	0.26	0	0.26	2.8
Total (priority peatlands)	**117.84**	**2.79**	**1.41**	**4.2**	
Total (other sensitive habitats)	**86.69**	**4.08**	**2.5**	**6.58**	
Total (all)	**204.53**	**6.87**	**3.91**	**10.78**	

7.6.29. Temporary, indirect habitat modification will occur due to plant movements around some of the built elements of the Proposed Varied Development, and it is expected that these disturbed areas will be restored following construction. This temporary, indirect habitat modification will predominantly affect M23 rush-pasture and the Restored Peatland in the north of the Site (**Table 7.8**).

7.6.30. Permanent, indirect habitat modification is the impact of changes to habitats within a 10 m buffer of all permanent infrastructure, for example through localised changes to hydrology within a peatland. This habitat modification will occur to several sensitive habitats across the Site (**Table 7.8**), but most will occur to the M23 rush pasture and Restored Peatland.

7.6.31. A total of 28.13 ha (13.7%, **Table 7.7**, **Table 7.8**) of the sensitive habitats (total area 204.53 ha) within the Site will be impacted by temporary or permanent habitat modification, although much of this is impacting M23, M23/M15 and M25 habitats in the south of the Site, which were found to be degraded due to grazing pressure.

7.6.32. When considering the permanent direct and indirect modification of priority peatland habitats. A total of 8.33 ha will be affected which equates to 7.1% of the priority peatlands (117.84 ha) and 4.1% of the sensitive habitats (204.53 ha) in the Site (**Table 7.7, Table 7.8**). The compensation and enhancement for the direct loss and/or long-term modification of 8.33ha of priority peatland is discussed further in Section 5 Habitat Management Plan. Of the priority peatland habitats directly lost (2.79 ha, **Table 7.7**), 59% (1.65 ha) were in the area of Restored Peatland. This is an area that was recently conifer plantation and was restored to peatland using techniques including stump flipping and ground smoothing. As restoration work was undertaken in 2024, this land does not yet represent a high quality, functioning peatland, but will be managed in the long term with that aim.

Table 7.8: Summary of indirect modification of sensitive habitats

Habitat	Total area of habitat within Site (ha)	Permanent, indirect modification (ha)	Temporary, indirect modification (ha)	Total Area Affected (ha)	% of habitat within Site affected
Priority Peatlands					
M15 (on peat >0.5 m)	6.38	0.14	0.07	0.21	3.29
M16a (on peat >0.5 m)	2.42	0.03	0.01	0.04	1.65
M19	13.17	0.67	0.27	0.94	7.14
M20	25.02	1.95	0.78	2.73	10.91
M23/M15 (on peat >0.5 m)	0.41	0.05	0.02	0.07	17.07
M25 (on peat >0.5 m)	6.76	0.38	0.15	0.53	7.84
P1- Restored Peatland	63.68	2.32	0.99	3.31	5.2
Other sensitive habitats					
M15 (on peat ≤0.5 m)	6.03	0.21	0.16	0.37	6.14
M16	1.07	0.07	0.03	0.1	9.35
M16a (on peat ≤0.5 m)	2.14	0.03	0.02	0.05	2.34

Habitat	Total area of habitat within Site (ha)	Permanent, indirect modification (ha)	Temporary, indirect modification (ha)	Total Area Affected (ha)	% of habitat within Site affected
M23	68.17	5.95	2.79	8.74	12.82
M23/M15 (on peat ≤0.5 m)	0.01	0	0	0	0
MG10	9.27	0.19	0.07	0.26	2.8
Total (priority peatlands)	**117.84**	**5.54**	**2.29**	**7.83**	
Total (other sensitive habitats)	**86.69**	**6.45**	**3.07**	**9.52**	
Total (all)	**204.53**	**11.99**	**5.36**	**17.35**	

7.6.33. A total of 28.13 ha (13.7%, **Table 7.7**, **Table 7.8**) of sensitive habitats within the Site will be impacted by permanent or temporary direct or indirect habitat loss and modification. The total Site area is 698.71 ha (**Table 7.5**), and thus habitat loss and modification will impact 4.02% of the habitats within the Site.

7.6.34. Permanent loss of sensitive habitats, both direct (6.87 ha) and indirect (11.99 ha), will be 18.86 ha (**Table 7.7**, **Table 7.8**), which equates to 2.7% of all habitat (698.71 ha) within the Site and 9.22% of all sensitive habitats (204.53 ha) within the Site. Although direct habitat loss and indirect habitat modification are both long-term impacts (i.e., over the lifetime of the Proposed Varied Development), the magnitude of the impact is considered to be low, given the modified and degraded nature of the habitats. In the absence of mitigation, it is concluded that this moderate impact on sensitive habitats, which are of regional conservation value, will be adverse, but not significant.

Badger

7.6.35. There is potential for any badgers using the setts previously recorded (**Confidential Annex, Figure 7.5**), or any new setts, to be disturbed during construction of the Proposed Varied Development. NatureScot guidelines state that work within 30 m of the entrance to a badger sett (100m for pile driving and blasting work) could result in disturbance to a badger using that sett (NatureScot, 2024c).

7.6.36. All three of the known setts are not situated within 30 m of any new infrastructure (including a 4 m buffer to allow for plant movements), however Sett C, which was the only confirmed active sett, is located in woodland approximately 36 m away from one of the hardstands and a path leading from the woodland to the open habitat near the hardstand was observed during the 2025 survey. However, as the conifer plantation in the Site will be felled to facilitate construction of the Proposed Varied Development, any badgers occupying these three setts are likely to be disturbed and there is potential for the setts to be destroyed during the felling works.

7.6.37. The results of the field surveys undertaken since 2013 indicate that these setts may be intermittently used by badgers. Felling in the vicinity of the setts will be short in duration, however disturbance is likely as the entire conifer forestry plantation is due to be felled, including within a 30 m buffer of these setts. The loss of these setts could be important for the local badger clans, and therefore, the magnitude of the impact of disturbance on badgers is considered to be moderate. As badgers are considered to have local conservation value, the effect of disturbance or destruction of setts during construction is **adverse but not significant**.

7.6.38. There is a potential for injury and/or mortality to badgers due to plant movements during construction or during felling of the woodland around the three setts. However, field survey results suggest generally low activity across the Site and badgers are nocturnal, and unlikely to be outside of their setts during the day when construction is occurring. Considering this, the effect of injury and/or mortality to badgers is concluded to be **adverse but not significant**.

7.6.39. The presence of multiple setts, dung pits and a path confirm that badgers are using the site, however no foraging signs or main setts were observed, suggesting low activity across the Site. Some habitats that badgers could use will be permanently lost beneath the footprint of the Proposed Varied Development and the habitat within the Site will change substantially when the conifer plantation is felled. The felled plantation may be an improvement for badgers, as it may create new foraging opportunities. However, considering the low activity the effect of habitat loss and change was concluded to be **negligible and not significant**.

Bats

7.6.40. No roosts or buildings/trees with roost potential are anticipated to be lost to the Proposed Varied Development, however seven buildings and eight trees with roost potential are present within a 30 m buffer of the access track and the construction compound, and therefore there is a potential for disturbance during construction.

7.6.41. The buildings along the access track and within the Site with bat roost potential are all in active human use, and therefore any roosting bats will be habituated to some level of disturbance. The level of disturbance will be temporary during construction and is likely to be primarily associated with large plant movements past these buildings, and so may be intermittent and short-term over the construction period. Based on this, the magnitude of disturbance is considered to be low, resulting in **adverse but not significant** effect.

Freshwater fish

7.6.42. There is a potential for injury and/or mortality to fish during construction of watercourse crossings and some habitat will be lost or altered beneath the footprint of the crossings. Additionally, pollution inputs during construction could degrade habitats or, in extreme cases, result in injury or mortality to individual fish.

7.6.43. One additional new watercourse crossing is included along the access track for the Proposed Varied Development, on an unnamed tributary to Tangy

Burn. Brown trout were widely distributed across the Site in the watercourses surveyed for the 2018 EIAR (**Volume 4, Appendix 10.4**), albeit sometimes in low densities in the upper reaches. The unnamed tributary where the new watercourse crossing was not surveyed for the 2018 EIAR but is hydrologically connected to Tangy Burn and thus it is likely that this watercourse also supports brown trout.

7.6.44. Construction of watercourse crossings will be localised and working within the channel will be short-term, although injury and/or mortality is a permanent impact. Overall, the magnitude is considered to be moderate, resulting in an adverse but not significant effect on brown trout.

7.6.45. The watercourse crossings will be designed following good practice guidelines, which will include minimising their size, prioritising clear-span bridges where possible and any culverts being sunken beneath bed level and filled with natural substrates. Thus, although habitats will be changed, the magnitude of the impact is concluded to be low, resulting in an **adverse but not significant** effect, in the absence of mitigation.

7.6.46. Watercourse crossing construction will be localised and short-term, which minimises the risk of pollution input into watercourses. In the absence of mitigation, the magnitude of the impact is considered to be moderate, which would result in an **adverse but not significant** effect on degradation of brown trout habitats due to pollution inputs.

Operational Effects

Sensitive habitats, badger, freshwater fish

7.6.47. Operational effects on sensitive habitats, badger and freshwater fish are not expected to differ from what was assessed in the 2018 EIAR (**Volume 1, Chapter 10, paragraphs 10.5.14, 10.5.19, 10.5.21**).

Bats

7.6.48. Operational effects include:

- increased collision risk: due to larger turbines with a greater tip length and the presence of operational lighting; and
- permanent loss of foraging and commuting habitat due to the loss of conifer plantation and operational lighting which could discourage bats from using existing foraging and commuting corridors.

7.6.49. Operational turbine lighting was not required for the Consented Development, however due to the increase tip height and the proximity to Campbeltown

Airport, the Proposed Varied Development| will require infra-red hub mounted (approximately 150m high) obstruction lights on all 16 turbines and visible-red lights on 5 turbines (T1, T5, T6, T8 and T11, all situated on the perimeter of the Proposed Varied Development) (**Technical Appendix 15.1**). The lights are predicted to be set at 200cd for an estimated 98% of the time, increasing to 2000cd during periods of low visibility due to cloud obstruction.

7.6.50. Artificial lighting at night can impact bats by delaying their emergence from roosts (which reduces time spent foraging), increasing collision risk by attracting invertebrate prey and inhibiting movement across the landscape by creating barriers to commuting (Institution of Lighting Professionals (ILP), 2023).

7.6.51. Little information is available on the impact of turbine-mounted lighting, however the use of red lighting is considered to have a lower effect on emerging bats and a lower attraction effect for invertebrates than lighting with a high blue content (ILP, 2023; Voigt et. al., 2018).

Collision Risk

7.6.52. The bat species identified during baseline surveys (e.g., common and soprano pipistrelle, *Nyctalus* species) are all high collision risk species in Scotland, due to factors such as habitat preference, flight speed, hunting techniques, flight behaviour and use of the landscape (NatureScot, 2021).

7.6.53. To assess the impact of increased collision risk, a risk assessment was undertaken following NatureScot (2021) guidance. This guidance states that a medium sized project is one with 10-40 turbines of 50-100 m in height (NatureScot, 2021). Although the turbines for the Proposed Varied Development will be >100 m, it was concluded that the Proposed Varied Development is a medium sized project, as it includes only 16 turbines, which minimises the total area of land that poses a collision risk, compared to the threshold of 40 turbines for a large project size.

7.6.54. Taking the habitat and project size together, the initial risk assessment for the Proposed Varied Development is concluded to be Medium, based on Table 3a in NatureScot's 2021 guidance. Table 3b of NatureScot's guidance (2021) assigns an overall risk category based on the initial risk assessment and the activity level of high collision risk species (such as common and soprano pipistrelle, Leisler's bats and other *Nyctalus* species). The result from the 2018 EIAR concluded overall low bat activity at the site, but this was based on deployment of three static detectors, whereas current guidelines recommend that twelve statics are deployed for a sixteen turbine site (NatureScot, 2021). Based on this, a precautionary approach was taken and the Site was considered to have low-moderate bat activity, which gives an overall risk of Medium. This risk assessment, combined with the irreversible impact of

mortality and the long-term nature of the operation of the Proposed Varied Development, results in an impact that is of moderate magnitude. As bats are of regional conservation value, the overall effect of this moderate impact is concluded to be **significant adverse**, in the absence of mitigation.

Permanent Habitat Loss

7.6.55. Habitat within the Site was considered to be moderate, due to the presence of linear features (e.g., watercourses and forest edges) that could be used for foraging and the presence of roost features of moderate potential within the Site (**Figure 7.4**).

7.6.56. The conifer plantation within the Site will be felled during construction of the Proposed Varied Development and replanted during operation. The existing plantation provides linear features that bats in area are likely to use for foraging and commuting across the Site and within the wider landscape. The presence of operational lighting could have further implications for foraging and commuting bats, if they are discouraged from using flight lines within the Site due to the lighting.

7.6.57. In the context of individual bats, the loss of this foraging and commuting habitat will be long-term or permanent but some of this impact will be reversible in the context of the bat population, as the forestry will be replanted during operation. The proposed lighting will be infra-red or visible red, which may have a lower impact on bats than light with a high blue content (Voigt et. al., 2018). Considering the above, the impact is concluded to be low, resulting in an **adverse, not significant** effect.

Decommissioning Effects

7.6.58. Decommissioning effects on sensitive habitats, badger, bats and freshwater fish are not expected to differ from the conclusions of the 2018 EIAR (**Volume 1, Chapter 10, paragraphs 10.5.23 and 10.5.24**).

7.7. Revised Mitigation Measures for the Proposed Varied Development

Targeted Mitigation Measures

7.7.1. Targeted mitigation measures, taken both from the 2018 EIAR and based on subsequent surveys and this impact assessment, were developed to minimise impacts to IEFs.

Mitigation During Construction

7.7.2. The 2018 EIAR included the following targeted mitigation measures designed to minimise impacts to protected species during construction:

- A pre-construction survey will be undertaken prior to the start of construction to update the baseline information for protected species, including badgers (2018 EIAR, **Volume 4, paragraph 10.6.5**). The survey will ideally be completed within eight months of the start of construction, but earlier surveys may be required to capture suitable survey seasons (e.g., bat activity season). The Badger Protection Plan will be updated following completion of this survey. The survey will inform the need for additional species protection plans or licences.
- A Badger Protection Plan was developed to outline the potential impacts to badgers and recommended mitigation measures to protect badgers and their setts during construction and minimise impacts (2018 EIAR, **Volume 4, Appendix 10.5**).
- Felling will be undertaken within the conditions of a Standard Forestry Operations Licence for badgers, following methods that will protect the structure of the known setts (and any new setts identified during pre-construction surveys) from destruction, as far as reasonably practicable. Measures to achieve this include restricting vehicular access, including harvesting machines, within a protection zone, felling trees by hand (e.g., by using a chainsaw) from within the protection zone or felling trees using a harvester situated outside of the protection zone.
- A CEMP will be developed (**Technical Appendix 3.6e**) which will outline all protection and mitigation measures for anticipated environmental impacts.
- Pollution prevention measures designed to protect watercourses during all construction activities as well as when working within a watercourse (i.e., when constructing crossings).

7.7.3. For works undertaken along the Access Track that may disturb roosting bats, the following mitigation measures are proposed (WSP, 2024):

- A dusk survey or other suitable alternative method (e.g., aerial inspection, camera monitoring) will be undertaken the evening before any works to ensure there are no active roosts.
- A Bat Species Protection Plan would be developed and adhered to during construction.
- A toolbox talk would be given to all site operatives on the potential impacts to bats and their roosts.
- No trees with bat roost potential would be disturbed, felled or lopped without approval from a suitably qualified ecologist. A licence may be required for these works.

7.7.4. An Ecological Clerk of Works will be employed for the duration of the construction works, in line with Condition 24 of the Planning Consent for the Consented Development.

7.7.5. Due to the presence of buildings with roost potential in close vicinity to the construction compound for the Proposed Varied Development, a Bat Protection Plan would be developed which will outline measures to be undertaken to minimise impacts of disturbance to any roosting bats. This will consider disturbance from plant movements past the buildings. Emergence surveys would be undertaken to inform the Bat Protection Plan, which will target buildings, structures and/or trees with bat roost potential that may be disturbed or destroyed during the works. These surveys may need to be undertaken before the pre-construction survey, as they need to be completed during the bat activity season (April – October).

7.7.6. If brown trout are likely to be spawning in areas to be dewatered for watercourse crossings, in-channel work will not be undertaken between 1st October and 31st May, to avoid the sensitive spawning period for brown trout. A suitably qualified ecologist or ECoW should assess whether brown trout are likely to be spawning

7.7.7. Immediately prior to the construction of watercourse crossings, a fish rescue will be undertaken to remove any fish in the area to be dewatered and relocate them to a suitable alternative location (likely to be immediately upstream or downstream of the working area).

Mitigation During Operation

7.7.8. A suitable buffer will be in place around all keyholed turbines to minimise the collision risk to bats, calculated using the equation provided in NatureScot's (2021) guidance on bats and onshore wind turbines. Based on a nominal

blade length of 75 m, a hub height of 125 m and a woodland height of 10 m, this buffer is calculated to be 49 m from blade tip, and therefore NatureScot's standard buffer of 50 m is recommended for each turbine.

7.7.9. All turbine bases will be monitored for bat carcasses on a monthly basis between April and October, inclusive, for bat fatalities during the first two years of operation (**Technical Appendix 3.6a**). Searches will be centred on each turbine and shall cover a minimum 50 m buffer from the turbine base and areas around ancillary infrastructure (e.g., stairs). The results of this monitoring will be used to identify additional mitigation measures and the requirement for further monitoring.

7.7.10. Additional woodland planting is proposed in the west of the Site, which will create new foraging and commuting corridors for bats, as outlined in the HMP (**Technical Appendix 7.2**).

7.7.11. Trackside drains and silt traps will be in place during operation to control runoff and maintain good water quality, to minimise the risk of pollution to watercourses and Tangy Loch (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.6.10**).

Mitigation during Decommissioning

7.7.12. The Tangy I and II infrastructure that is not to be used for the Proposed Varied Development will be removed and reinstated where possible, and it is anticipated that the resulting habitats will resemble the adjacent M23 rush pasture and M23/M25 mire habitats (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.6.11**). Habitat reinstatement details are set out in the Decommissioning Method Statement – Tangy I & II (**Technical Appendix 3.7c**).

Habitat Management Plan

7.7.13. A total of 8.33 ha of priority peatland is calculated to be directly and indirectly impacted by the Proposed Varied Development (**Table 7.7, Table 7.8**). In line with NatureScot guidance (NatureScot, 2026), 83.3 ha of peatland should be restored to compensate for this loss of peatland habitat to achieve at 1:10 lost:restored ratio.

7.7.14. A Habitat Management Plan ('HMP') was prepared for the Consented Development and was submitted for condition discharge, receiving approval from both NatureScot and Argyll & Bute Council in October 2024. However, a revised HMP for the Proposed Varied Development has been prepared to accompany this variation application due to some minor changes associated

with the varied scheme. This is provided at **Technical Appendix 7.2: Habitat Management Plan** for Proposed Varied Development.

7.7.15. The revisions to the HMP are confined to the forest to bog restoration sections and result from two refinements to site survey data and layout. First, the updated turbine and infrastructure layout associated with the Proposed Varied Development results in a minor reduction to the committed forest to bog restoration area, from 85.77ha to 79.48ha, due to a small area of previously proposed restoration ground (3.97ha) now forming part of the permanent footprint of the development and subsequent indirect impacts and the removal of a further area of shallow peat from the restoration programme with FLS. Second, the HMP for the Consented Development included an aspiration to increase the restoration area up to 110ha by expanding the forest to bog restoration activities on the Lagalgarve property, subject to further survey work. Subsequent detailed peat depth survey data obtained for the Proposed Varied Development in the western areas of the site indicates predominantly shallow peat depths across those areas, meaning they are likely unsuitable candidates for peat restoration. That speculative figure has accordingly been removed from the revised HMP to reflect the position supported by the available evidence.

7.7.16. The revised committed restoration area of 79.48ha of forest to bog restoration remains a substantial habitat enhancement commitment and the objectives of the HMP are otherwise unchanged. This includes the 14.5ha of open moorland peatland restoration, in addition to the 79.48ha of forest to bog restoration. Combined, the total committed and feasible peatland restoration for the site will total 93.98ha of peatland restoration to compensate for 8.83ha of impact. for delivering long-term peatland enhancement at the site.

7.7.17. Notwithstanding the minor reduction in restoration area, the Proposed Varied Development continues to exceed NatureScot's1:10 peatland compensation ratio guidance and delivers a biodiversity net gain of +33%, representing a strong positive biodiversity outcome that materially exceeds baseline conditions.

Biodiversity Net Gain

7.7.18. National Planning Framework 4 (‘NPF4’) Policy 3 requires development proposals to demonstrate a significant net improvement in biodiversity. Whilst no formal percentage gain is mandated in Scotland, a gain of +10% or above considered significant biodiversity net gain in the Statutory Metric approach to BNG in England and has become a benchmark in Scotland in the absence of a Scottish equivalent.

7.7.19. A detailed Biodiversity Net Gain (‘BNG’) assessment has been carried out for the Proposed Development using the SSER BNG Toolkit, which provides a

quantitative assessment of area-based biodiversity units. The results of the assessment are presented in full in **Technical Appendix 7.1 Biodiversity Net Gain Assessment** and are summarised below.

7.7.20. The assessment demonstrates that the Proposed Development will deliver a significant biodiversity net gain of +33% above baseline, equating to an increase of 252.88 biodiversity units, providing confidence that the development will achieve demonstrably positive effects for biodiversity in accordance with NPF4 Policy 3. The assessment was also evaluated against the ten best practice principles for BNG, with five criteria confirmed as achieved and the remaining five future criteria on target to be achieved, further demonstrating the project's compliance with the policy framework. The forest to bog restoration programme secured through the HMP is the principal driver of this positive BNG outcome.

Forest Replanting

7.7.21. It is intended that 224.74ha of coniferous forest plantation will be felled to accommodate the Proposed Varied Development and this will be replanted to a keyhole design. The replanting will be predominantly Sitka spruce Picea sitchensis from a slow growing provenance and it will be felled upon reaching 10 m in height (2018 EIAR, **Volume 1, Chapter 10, paragraph 10.6.14**).

Residual Effects

7.7.22. In the absence of targeted mitigation, the effects of collision risk on bats was significant adverse, and all other effects were concluded to be either negligible or adverse but not significant (**Table 7.9**). Targeted mitigation measures will further reduce adverse impacts and the overall effect on peatland habitat is concluded to be beneficial, after peatland restoration is taken into consideration.

Table 7.9: Summary of impact assessment for IEFs (significant effects in bold)

IEF (conservation value)	Impact	Effect	Targeted Mitigation	Residual Effect
Construction				
Sensitive habitats (regional)	Permanent habitat loss (direct and indirect)	Adverse (not significant)	Peatland restoration as outlined in the HMP	Beneficial (not significant)
Badger (local)	Disturbance	Adverse (not significant)	Badger Protection Plan	Negligible (not significant)

IEF (conservation value)	Impact	Effect	Targeted Mitigation	Residual Effect
	Injury and/or mortality	Adverse (not significant)	Badger Protection Plan	Negligible (not significant)
	Loss of habitat	Negligible (not significant)	Woodland planting in HMP	Beneficial (not significant)
Bats (regional)	Disturbance	Adverse (not significant)	Bat protection plan, pre-construction survey.	Negligible (not significant)
	Loss of foraging habitat	Adverse (not significant)	n/a	Adverse (not significant)
Freshwater fish (local)	Injury and/or mortality	Adverse (not significant)	Fish rescue before construction, avoiding sensitive spawning period	Negligible (not significant)
	Habitat loss	Adverse (not significant)	Minimising footprint of construction	Negligible (not significant)
	Habitat degradation due to pollution input	Adverse (not significant)	Pollution prevention measures in the CEMP	Negligible (not significant)
Operation				
Bats (regional)	Collision risk	**Adverse (significant)**	Keyhole buffer zone around turbines.	Negligible (not significant)
	Habitat loss	Adverse (not significant)	Woodland and riparian planting in the HMP.	Negligible (not significant)

Comparison of Effects of the Proposed Varied Development and Consented Development

7.7.23. The conservation value of IEFs was determined based on updated guidance (e.g., CIEEM, 2018; NatureScot, 2026) and updated baseline conditions. The conservation value for badgers and freshwater fish was the same between the Consented and Proposed Varied Developments, however the conservation value for both sensitive habitats and bats was determined to be regional for

the Proposed Varied Development, compared to local and county for the Consented Development, respectively.

7.7.24. Some differences in the nature of an impact were identified between the two developments, but the overall significance was the same both in the absence of mitigation and after targeted mitigation was considered, with the exception of collision risk to bats (**Table 7.10**). This assessment assigned a higher conservation value to bats, based on current guidelines. A conservative approach to assigning conservation value and risk was taken as the baseline survey data collected to inform the 2018 EIAR was not in line with current recommendations (e.g., NatureScot, 2021). The nature of the impact of collision risk on the bat assemblage at the site was similar for the Consented Development and Proposed Varied Development, however, the higher conservation value assigned to bats for this assessment resulted in a significant adverse effect.

7.7.25. Some impacts were assessed for the Proposed Varied Development that were not assessed for the Consented Development, such as injury and/or mortality to badgers and freshwater fish during construction, and so a comparison could not be made (**Table 7.10**).

7.7.26. Overall, some differences were identified between the Consented Development and Proposed Varied Development which could impact IEFs differently. Although the same guidelines (CIEEM, 2018) were followed in impact assessment, several IEFs were given higher conservation ratings based on current information and guidelines. With the exception of collision risk to bats, the impact assessments for the Consented Development and Proposed Varied Development agreed in terms of identifying significant effects before targeted mitigation (**Table 7.10**). Both impact assessments concluded that there would be no significant residual impacts to any IEFs, once targeted mitigation measures were taken into account.

Table 7.10: Comparison of effects of the Consented Development and Proposed Varied Development

IEF (conservation value) Impact	Effect with no targeted mitigation		Residual	
	Consented Development	Proposed Varied Development	Consented Development	Proposed Varied Development
Construction				
Sensitive habitats (regional – PVD) (local – CD)	Adverse (not significant)	Adverse (not significant)	Negligible	Beneficial (not significant)

IEF (conservation value) Impact	Effect with no targeted mitigation		Residual	
	Consented Development	Proposed Varied Development	Consented Development	Proposed Varied Development
Permanent habitat loss (direct & indirect)				
Badger (local) Disturbance during works and/or felling	Not significant	Negligible (not significant)	Not significant	Negligible (not significant)
Badger (local) Injury and/or mortality	Not assessed	Negligible (not significant)	Not assessed	Negligible (not significant)
Badger (local – PVD, CD) Loss/change of habitat	Not significant	Negligible (not significant)	Beneficial (not significant)	Negligible (not significant)
Bats (regional – PVD) (county – CD) Loss of foraging/commuting habitat	Adverse (not significant)	Adverse (not significant)	Not significant	Adverse (not significant)
Bats (regional – PVD) (county – CD) Disturbance	No impacts predicted	Adverse (not significant)	No impacts predicted	Not significant
Freshwater fish (local – PVD, CD) Injury and/or mortality	Adverse (not significant)	Adverse (not significant)	Not significant	Negligible (not significant)

IEF (conservation value) Impact	Effect with no targeted mitigation		Residual	
	Consented Development	Proposed Varied Development	Consented Development	Proposed Varied Development
Freshwater fish (local – PVD, CD) Habitat loss	Adverse (not significant)	Adverse (not significant)	Not significant	Negligible (not significant)
Freshwater fish (local – PVD, CD) Habitat degradation due to pollution	Adverse (not significant)	Adverse (not significant)	Not significant	Negligible (not significant)
Operation				
Bats (regional – PVD) (county – CD) Collision risk	Adverse (not significant)	**Adverse (significant)**	Not significant	Negligible (not significant)
Bats (regional – PVD) (county – CD) Habitat loss	Not significant	Adverse (not significant)	Not significant	Negligible (not significant)

Cumulative Assessment

7.7.27. The cumulative impact assessment identified other wind farm developments and known grid connections within a 10 km buffer of the Turbine Area for the Proposed Varied Development. Developments without an EIA submitted (e.g., those in Scoping) were not considered as baseline results and an impact assessment were not available. Operational wind farms; including Beinn an Tuirc 1, 2 and 3 and Blary Hill; were only considered in the cumulative assessment of collision risk to bats. Impacts on other IEFs from these operational developments are considered as a part of the baseline.

7.7.28. Following these criteria, the cumulative impact assessment considered four developments for all IEFs (**Table 7.11**):

- Cnoc Buidhe Wind Energy Hub (Belltown Power, 2025);
- Allt Domhain Wind Farm (EnergieKontor, 2025);

- Clachaig Glen Wind Farm (RWE, 2022);
- LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection (SSEN, 2025).

7.7.29. An additional three developments were considered for operational impacts to bats only (**Table 7.11**):

- Beinn an Tuirc Wind Farm;
- Beinn an Tuirc 2 Wind Farm;
- Beinn an Tuirc 3 Wind Farm; and
- Blary Hill Wind Farm.

7.7.30. The loss of bog, flush or heath habitats in the Sites for the developments considered in the cumulative assessment ranged from <1% - 10%, where an EIA was available (**Table 7.11**). Based on habitat mapping results, some loss of bog, flush and/or heath habitat is likely for the LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection, but the extent is not currently known as that development is still in design. Despite a permanent loss of sensitive habitats, all developments for which an EIA was available, including the Proposed Varied Development, concluded that the residual effects would be not significant or beneficial through the implementation of habitat restoration measures outlined in each development's HMP. The LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection has committed to minimising impacts to sensitive habitats in design and compensating for and restoring upland habitats following construction, and so it is assumed that residual effects will be not significant for that development. Based on this, **no cumulative significant impacts are predicted**.

7.7.31. Badgers were scoped out of all of the developments where an EIA was available due to no evidence within the survey areas (**Table 7.11**), and therefore no cumulative impacts are anticipated. The Scoping Report for the LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection has scoped badger into consideration for the EIA, but detailed survey results are not currently available. That development has committed to developing a final design that minimised impacts on protected species and their habitats and best practice measures during construction. Assuming these are followed, it is considered likely that there will be no significant residual impacts on badgers, and therefore **no significant cumulative impacts** with the Proposed Varied Development.

7.7.32. Where freshwater fish or watercourses were scoped into the impact assessment, impacts were not significant through sensitive design (e.g., minimising number and extent of watercourse crossings, maintaining fish passage) and implementation of good practice during construction (e.g., pollution prevention measures). These good practice measures are expected

to be included in the EIA for the LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection. Similar measures are also proposed for the Proposed Varied Development. The watercourses affected by these developments were mainly minor with small, sometimes isolated, populations of brown trout (where results from fish population surveys were available). Through application of the recommended measures, **no cumulative significant impacts are anticipated**.

7.7.33. The developments for which an EIA was available all recorded generally low to moderate bat activity across their respective sites, although high activity of common pipistrelle was recorded for Breackerie Wind Farm (**Table 7.11**). The bat assemblage at the sites was composed predominantly of common and soprano pipistrelles, both of which are of medium vulnerability to collision risk (NatureScot, 2021), but some high vulnerability species (i.e., Nyctalus species, Nathusius' pipistrelle Pipistrellus nathusii) were present in low numbers. Measures to mitigate effects for both individual developments and cumulative assessments include maintaining a minimum 50m buffer from blade tip to linear features (e.g., forest edges, watercourses), post-construction monitoring and feathering of blades. The LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection is not likely to cause a collision risk for bats, but impacts during construction (e.g., disturbance, habitat loss) may occur. That development has committed to bat surveys and adhering to a Species Protection Plan for bats, if one is considered necessary. Through application of these mitigation measures, no significant cumulative effects are anticipated.

Table 7.11: Summary of residual effects to IEFs from developments considered in the cumulative assessment

Development Name (ECU ID) Distance from PVD	Status	Effects Summary*
Considered for cumulative effects on all IEFs		
Cnoc Buidhe Wind Energy Hub (ECU00004767) 0 km	EIA Submitted	<u>Habitats</u> <7% of sensitive habitats (wet/dry heath, bog, marshy grassland, acid flush) impacted. No significant effects. <u>Bats</u> Low bat activity (predominantly common and soprano pipistrelles), limited roosting features. No significant effects.

Development Name (ECU ID) Distance from PVD	Status	Effects Summary*
LT377 Tangy IV Wind Farm and LT404 Cnoc Buidhe Wind Farm 132kV OHL Shared Use Connection (ECU00006122)	EIA in preparation	All IEFs No operational impacts are predicted. Habitats Large areas of bog habitat, including blanket bog, and purple moor-grass with rush pastures, both UKBAP Priority Habitats, were present along the proposed grid connection route plus a 50m buffer. The final design will seek to minimise impacts to sensitive habitats where possible. Best practice measures will be in place during construction, and the Scoping Report states that compensation and biodiversity enhancement measures will be undertaken for upland habitats. Badger Badger was identified as a sensitive receptor for this development and is anticipated to be scoped into the EIA. Best practice measures would be in place during design and construction to minimise impacts to badgers, including adhering to a Species Protection Plan, if necessary. Bats Linear features that could be used for commuting (e.g., watercourses, woodland edges) were present within a 50m buffer of the proposed grid connection route and one building with low suitability to support roosting bats was present. Best practice measures would be in place during design and construction to minimise impacts to bats, including adhering to a Species Protection Plan, if necessary. Fish Numerous watercourses are present within a 50m of the proposed grid connection route that have the potential to support freshwater fish. Best practice measures would be in place during design and construction to minimise impacts to watercourses and fish.
Allt Domhain (ECU00003231)	EIA Submitted	Habitats

Development Name (ECU ID) Distance from PVD	Status	Effects Summary*
7.4 km south		31.16 ha (7.69%) of peatland habitats impacted, 0.12 ha (2.11%) of heathland habitats impacted. No significant effects, minor beneficial effect on peatlands. Bats The Main Wind Farm Site (i.e., area of the Site where turbines and associated infrastructure are situated) provided limited foraging habitats and no potential roost features were present. Generally low bat activity in Main Wind Farm Site apart from one location along a watercourse away from the proposed turbine locations. Low activity of *Nyctalus* and Nathusius pipistrelle, most calls were common or soprano pipistrelle. No significant effects. Freshwater fish Brown trout present across Main Wind Farm Site in low densities. Downstream obstacles prevent migratory species from accessing the site. No significant effects.
Clachaig Glen Wind Farm (ECU00002103) 9.7 km north	Consented	Habitats Loss of 7.8 ha (2.1%) of blanket bog and 4.6 ha (10.1%) of heath in Site. Effects either not significant or significant beneficial. Bats No known roosts, little impact to foraging/commuting habitat. No bat activity on walked transects, limited bat activity from static detectors (predominantly common and soprano pipistrelles), Ecobat concluded Moderate activity. No significant effects. Freshwater fish Isolated population of resident brown trout due to downstream barriers, limited spawning habitat, low density. No significant effects.
Considered for collision risk to bats only		

Development Name (ECU ID) Distance from PVD	Status	Effects Summary*
Beinn An Tuirc 3 3.5 km east	Operational	A 14-turbine development. The existing turbines pose a collision risk for bats in the wider landscape.
Beinn An Tuirc 2 4.7 km north-east	Operational	A 19-turbine development. The existing turbines pose a collision risk for bats in the wider landscape.
Blary Hill 6.3 km north	Operational	A 14-turbine development. The existing turbines pose a collision risk for bats in the wider landscape.
Beinn an Tuirc 6.4 km north-east	Operational	A 46-turbine development. The existing turbines pose a collision risk for bats in the wider landscape.

PVD = Proposed Varied Development.

*Where an IEF for this assessment is not included in **Table 7.11**, it was scoped out of impact assessment for that development.

7.8. Conclusion

7.8.1. This assessment has considered the likely effects of construction, operation and decommissioning of the Proposed Varied Development, focussing on how those differed from the Consented Development. Assessment methods in this chapter mirrored those undertaken in the 2018 EIAR, although updated guidance documents (e.g., CIEEM, 2018) were used.

7.8.2. Existing baseline information was used in this assessment as well as the following information which has been made available since consent was granted:

- pre-construction survey along the Access Track in September 2024 (WSP, 2024);
- updated field surveys for bat roosting and badgers in November and December 2025;
- additional peat depth surveys within the Site; and
- updated mapping from FLS that revealed a change in land use in the north of the Site from conifer plantation to restore peatland.

7.8.3. Current national and local planning policies were considered in assessing impacts of the Proposed Varied Development on IEFs and existing documents

(e.g., HMP) and mitigation measures were reviewed to determine if they were in line with current policies.

7.8.4. Sensitive habitats, badger, bats and freshwater fish were identified as IEFs to be taken forward to impact assessment. Effects on all other potential IEFs were either scoped out of this assessment or deemed to not differ from the Consented Development. Only those effects that were likely to differ from the Consented Development were assessed, for example, operational impacts on all IEFs apart from bats were not assessed, as it was concluded that effects would not differ from the Consented Development.

7.8.5. When only embedded mitigation measures were considered, adverse effects on IEFs were identified during construction, but none of these were considered to be significant. A significant adverse effect on bats was identified due to collision risk during operation, but this was considered to be negligible after a buffer of at least 50 m was applied to all turbines from flight paths, particularly in the conifer plantation.

7.8.6. Targeted mitigation measures for the Consented Development include peatland restoration and bat carcass searching, as outlined in the HMP (**Technical Appendix 7.2**), and these measures were concluded to be appropriate as targeted mitigation measures for the Proposed Varied Development. Additional peatland restoration beyond what is required for compensation for peatland loss and native broadleaved woodland planting, as outlined in the HMP, are also considered adequate to deliver biodiversity enhancements for the Proposed Varied Development in line with NPF4.

7.8.7. The cumulative assessment considered on four other developments for all IEFs, and an additional four operational wind farms for collision risk effects to bats only. Through the application of embedded and targeted mitigation measures outlined in the EIAs for those developments, it was concluded that there would be **no significant cumulative effects** for the Proposed Varied Development.

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