Bhlaraidh Wind Farm Extension

Non-Technical Summary

December 2025

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1. Executive Summary

1.1. Preface

1.1.1. In 2022, SSE Generation Limited (hereafter referred to as 'the Applicant') secured approval under Section 36 of the Electricity Act 1989 ('the 1989 Act') and deemed planning permission for the construction and operation of Bhlaraidh Wind Farm Extension ('the Consented Development'). The Consented Development comprises up to 15 Wind Turbine Generators (WTGs), all at blade tip heights of up to 180 metres (m) and associated ancillary infrastructure.

1.1.2. The Applicant proposes a variation to the Consented Development (under Section 36c of the 1989 Act) to increase the tip height of the turbines (the 'S36C application'). The Applicant is also seeking a direction under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) (the 1997 Act) to vary the deemed planning permission granted in respect of the Consented Development. The proposed changes to the Consented Development are referred to in the application as 'the Proposed Varied Development'.

1.1.3. This document is the Non-Technical Summary (NTS) of the Environmental Impact Assessment Report (EIAR) which accompanies the S36C application for the Proposed Varied Development. The NTS summarises the key findings of the Environmental Impact Assessment (EIA) which has been undertaken to assess the change in potential impacts from the construction, operation and decommissioning of the Proposed Varied Development compared to the Consented Development.

1.1.4. The EIAR comprises 5 volumes, including two sub-volumes:

- Volume1: Written Text
- Volume 2: Non-LVIA Figures
- Volume 3a: Cultural Heritage & Landscape and Visual (NatureScot methodology) Figures;
- Volume 3b: Landscape and Visual (The Highland Council Methodology) Figures
- Volume 4: Technical Appendices; and
- Volume 5: Confidential Annex.

1.1.5. The application is supported by a Planning Statement, a Pre-Application Consultation (PAC) Report, and a Socio-Economic Report.

1.1.6. A hard copy of both the EIAR and the original 2021 EIAR and 2022 Additional Information Report (AIR) will be made available for public viewing during the application's consultation period at the following locations:

- The Highland Council HQ – Glenurquhart Road, Inverness, IV3 5NX
- Invermoriston Millennium Hall and Fort Augustus Village Hall as requested by Fort Augustus and Glenmoriston Community Council

1.1.7. Hard copies of the NTS are available free of charge from:

- SSE Generation Limited (contact: SSE Generation Ltd, FAO Onshore Development Team, 1 Waterloo Street, Glasgow, G2 6AY or OWSBSupport@sse.com)
- Hard copies of the EIAR and further information may be obtained by arrangement for £1,500 per copy, or £15 per disk/USB memory stick copy.

1.1.8. The documents will also be available for viewing online at:

- the Scottish Government ECU planning portal: https://www.energyconsents.scot/ApplicationSearch.aspx;
- The Highland Council (THC) planning portal: https://wam.highland.gov.uk/wam/; and
- The Applicant's website: https://www.sserenewables.com/onshore-wind/in-development/bhlaraidh-extension/

1.1.9. Any public representations to the application may be submitted via the ECU website at www.energyconsents.scot/Register.aspx; by email to the Scottish Government, Energy Consents Unit mailbox at representations@gov.scot; or by post to the Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU, identifying the proposal and specifying the grounds for representation.

1.1.10. The Applicant will advertise the submission of the application in the local and national press (The Herald, The Edinburgh Gazette and the Inverness Courier) and on the dedicated project website. The advert will state the deadline for submitting representations to the Scottish Ministers.

1.2. Need for the Proposed Variation

1.2.1. Following receipt of Section 36 consent and deemed planning permission for the Consented Development, the Applicant reviewed the commercial feasibility of the site and concluded that it was not viable under current settings. A project appraisal was then undertaken which identified that:

- The increase in tip height would substantially increase the energy yield from the Consented Development, thus improving the commercial viability of the project;
- Re-orientation of certain hardstands and minor track re-alignments could optimise the site layout and reduce required track length, resulting in associated environmental benefits;
- The Varied Development would make an even greater contribution to the achievement of legally binding UK and Scottish Government net-zero targets.

1.2.2. The Applicant therefore seeks to vary the Consented Development to improve the overall commercial viability of the site and maximises its contribution to Scotland's renewable energy targets.

1.3. The Proposed Variations

1.3.1. In summary, the Applicant is proposing to increase the maximum tip height of all turbines from 180m to 230m to increase the electricity generated from the site and maximise the renewable energy benefits. This has required some additional alterations to the site design to accommodate the larger turbines as follows:

- increase in the nominal rotor diameter of all turbines from 158m to 163m as required for updated candidate turbines;
- Repositioning of some turbines to capture optimal wind resource and accommodate required safety margins;
- Increase hardstanding size and rotating hardstand areas to meet technology and engineering requirements for the use of taller turbines (and some minimal hard stand repositioning to mitigate environmental impact); and
- Make minor adjustments to access tracks to reduce the required length and align with proposed hardstands movements, and remove one borrow pit search area to reduce the project's impact on peatland.

1.4. The Site

1.4.1. The site boundary for the Proposed Varied Development remains the same as the Consented Development (see **EIAR Volume 2, Figure 1.1: Site Location Plan**).

1.4.2. The Site is located on the Glenmoriston Estate, north-west of Invermoriston. The British National Grid (BNG) reference for the approximate centre point of the Turbine Development Area is (NH) 239512, 820991. The Site is situated to the east of the operational Bhlaraidh Wind Farm and would utilise the existing access for the operational Bhlaraidh Wind Farm, which connects to the A887.

1.4.3. The Site is located to the west of the Loch Ness and Duntelchaig Special Landcape Area and is within relatively close proximity of the Central Highlands Wild Land Area (WLA), the Levishie Wood Site of Special Scientific Interest (SSSI) and the River Moriston Special Area of Conservation.

1.5. The Applicant

1.5.1. SSE's purpose is to provide energy needed today while building a better world of energy for tomorrow. We do this by developing, building, operating and investing in electricity infrastructure and businesses needed in the energy transition. This includes electricity transmission and distribution networks, onshore and offshore wind farms, hydro-electric power and flexible thermal generation technologies. We also provide energy products and services for businesses and other customers. Our Transformation for Growth investment plan sees us investing £33bn in critical electricity infrastructure across the five years to 2030.

1.5.2. A FTSE-100 company headquartered in Scotland with operations across the UK and Ireland, SSE also has a presence in carefully selected international markets. We employ around 14,000 people and are a proud to be a 'real Living Wage' and 'Living Hours' employer and to be accredited with the 'Fair Tax Mark'. SSE was also the first company in the world to develop a 'Just Transition Strategy' aimed at ensuring the benefits of the clean energy transition are shared by workers and communities.

2. Description of Proposed Varied Development

2.1.1. The Site Layout is shown on **EIAR Volume 2, Figure 1.2,** and the Wider Site Layout Plan is shown on **EIAR Volume 2, Figure 1.3**. The Varied Development vs Consented Development layouts are shown together on **EIAR Volume 2, Figure 1.4**.

2.1.2. Similar to the Consented Development, the Proposed Varied Development would include the following key components:

- Up to 15 Wind Turbine Generators (WTGs) of up to 230m tip height, with an
- expected capacity of 93-108MW;
- Turbine foundations, crane hardstanding and associated laydown area at each WTG location;
- Approximately 21km of on-site access tracks comprising approximately 13.5km upgraded existing access track and approximately 7.9km of new access track (approx. 1.5km already constructed as part of the completed site enabling works);
- A network of underground cabling to connect each wind turbine to the on-site substation;
- 6 No. watercourse and culvert crossings (one of which is already constructed as part of site enabling works);
- 7 No. borrow pits (2 utilised and reinstated during Enabling Works, 5 will potentially be utilised during Main Works) (temporary)
- A LiDAR unit to collect meteorological and wind speed data;
- Any other associated ancillary works required.

2.1.3. In addition to the permanent components, the construction phase would comprise the following temporary facilities:

- Site compound areas, including welfare facilities, site cabins, storage and parking;
- Batching plant facilities for temporary concrete batching plants;
- Temporary telecommunications infrastructure.

2.1.4. **Table 1** summarises the differences between the Consented Development and the Proposed Varied Development.

Table 1: Differences between the Consented and Proposed Varied Development

S36 Consent (Annex 1 Description of Development)	S36c Proposed Variations
15 turbines each with a maximum blade tip height of up to 180m	15 turbines each with a maximum blade tip height of up to 230m. While the overall layout of the scheme is not substantially changed, due to the increase in tip height and resultant change to wake zones and increased safety buffer for topple distance, some turbines have necessarily been repositioned.
Crane hardstandings for each turbine	The size of the hardstands has increased to reflect the proposed candidate turbine model. Some hardstands have also been repositioned /reorientated to improve and reduce the earthworks required in response to turbine repositioning.
Approximately 7.9km of new access tracks	No change. The realigned sections of track balance out so there is no change to the approximate length of the new track at approximately 7.9km. Some spurs will be longer, e.g to T10, but this is balanced against some shorter spurs (T16 and T05). Despite the larger turbines, there would be a minimal change to length of the new access track. 1.4km of access track was constructed in 2024 as part of the Site Enabling Works.
Approximately 13.5km of existing access tracks	No change.
An onsite substation	No change. The substation platform has been constructed up to 275mm below final ground level (bFGL) as part of the Site Enabling Works in 2024. The final 275mm profile and construction of the substation building and associated infrastructure is still to occur as part of the main works. The transformer configuration is expected to change slightly.
8 turning heads	9 turning heads to accommodate turbine supplier delivery requirements for larger components.
Up to 8 borrow pit search areas;	Up to 7 borrow pit search areas, 2 of which have been worked and reinstated during Enabling Works and shall not be reused during Main Works.
Two temporary construction compounds;	No change.
A single permanent LIDAR station;	No change.
A concrete batching plant	No change.

6 new access track water crossings	No change.
Two routes of cross country cabling approximately 700m and 1200m in length.	Slight amendment to two routes of cross country cabling approximately 730m and 1010m in length resulting in reduction of overall cable length.

3. Site selection and design evolution

3.1. Site selection

3.1.1. The site boundary remains as per the Consented Development (refer to **EIAR Volume 2, Figure 1.1**). The criteria used in the initial assessment to determine the suitability of the Site for the Consented Development and the subsequent design process, including alternatives considered and site layout evolution, these are described in the 2021 EIAR for the Consented Development.

3.1.2. The decision by the Scottish Ministers in 2022 to grant the Section 36 consent and deemed planning permission for the Consented Development has established the suitability of the Site for a large-scale wind farm.

3.2. Design Evolution

3.2.1. The Applicant has sought to maintain close alignment between the final design of the Proposed Varied Development and the Consented Development (refer to **EIAR Volume 2, Figure 1.4**), ensuring that changes are limited to those necessary to enhance viability or benefit/reduce environmental effects.

3.2.2. Where slight changes to the track alignments have been necessary for the Proposed Varied Development, an iterative design process has been followed to refine the layout, with changes supplemented, where appropriate, by supplementary field-based surveys, including peat probing and visual impact assessments.

3.2.3. Upon completion of the scoping exercise, and after hosting two sets of public exhibitions in June and September 2025, there were no objections or representations which lead to the need to make any fundamental changes to the overall design of the Proposed Varied Development.

3.2.4. Detailed information on the design evolution can be found in **EIAR Volume 1, Chapter 2: Design Iteration** of the Proposed Varied Development's EIAR.

3.3. EIA methodology

3.3.1. As the Applicant is seeking to vary a consented scheme, a comparative EIAR is required to compare the likely significant effects arising from the Proposed Varied Development against those identified in the 2021 EIAR and 2022 AIR for the Consented Development. This information is presented in the executive

summary within each EIAR technical chapter and drawn together in EIAR **Chapter 17: Summary of Residual Effects**.

3.3.2. The scope of the EIA was informed by an EIA Scoping Opinion provided by the Scottish Government Energy Consents Unit (ECU) in consultation with consultees including The Highland Council (THC), NatureScot, Scottish Environment Protection Agency (SEPA), Historic Environment Scotland (HES) and other consultees.

3.3.3. The Scoping Opinion scoped in the following technical assessments:

- Ecology
- Ornithology
- Archaeology & Cultural Heritage
- Landscape and Visual Impact
- Geology & Soils
- Traffic & Transport
- Noise & Shadow Flicker[1]
- Aviation & Radar

[1] The Highland Council (THC) response to the Scoping Report confirmed that construction noise and vibration could be scoped out but requested an updated operational noise assessment to demonstrate that the Proposed Varied Development would comply with the Consented Development's conditioned noise limit.

4. Summary of technical and comparative assessments

4.1. Ecology

4.1.1. The EIA includes an assessment of the likely significant effects of the Proposed Varied Development on non-avian ecological features. The assessment considers only effects attributed to differences between the Consented Development and Proposed Varied Development.

4.1.2. Where it is unlikely that effects to ecological features will differ, these features are scoped out of the impact assessment for the Proposed Varied Development. The assessment builds on comprehensive baseline data collected for the Consented Development, supplemented by an updated desk study to capture any additionally available ecological information.

4.1.3. Baseline field surveys found that the Site is being used by otters (*Lutra lutra*) and water voles (*Arvicola amphibius*), bat activity was generally low or moderate and the fish community was primarily composed of resident brown trout (*Salmo trutta*). Two statutory designated sites, the Levishie Wood Site of Special Scientific Interest (SSSI) and River Moriston Special Area of Conservation (SAC), were identified within a 3km buffer of the Site. Habitats within the Site were predominantly composed of wet heath and blanket bog, but wet modified bog, dry heath, unimproved acid grassland, marshy grassland and standing water were also present. Several of the National Vegetation Classification (NVC) communities within the Site have the potential to be groundwater dependent terrestrial ecosystems (GWDTEs), but detailed hydrological assessment concluded that these habitats were all unlikely to be dependent on groundwater. Although unlikely to be a GWDTE, the M11 habitat in the Survey Area was considered to be a locally unusual wetland.

4.1.4. The potential effects on designated sites and protected species such as otters, water voles, bats and aquatic species would not differ between the Consented and Proposed Varied Development, and thus these features were scoped out of the EIA. Similarly, as no GWDTEs were considered likely in the setting of the Site, these were also scoped out. Due to increases in hardstands and other changes to the layout, it was concluded that effects to peatland habitats and M11 mire could differ between the Consented and Proposed Varied Developments, and these were scoped into the EIA.

4.1.5. Taking into account the embedded mitigation measures for the Consented Development within the 2021 EIAR ecology assessment (**2021 EIAR, Volume 1, Chapter 5: Ecology, Section 5.8**), and measures contained in the outline Habitat Management Plan (HMP) (**2021 EIAR, Volume 4, Technical**

Appendix 5.7) and Deer Management Plan (DMP) (**2021 EIAR, Volume 4, Appendix 5.6**), no significant residual effects on peatland habitats, or M11 mire were identified in the 2021 EIAR.

4.1.6. Further detailed assessment undertaken in 2024 to refine the outline HMP to satisfy planning condition 18 of the Consented Development concluded that the proposed peatland restoration as presented in the final HMP (**EIAR Volume 4, Technical Appendix 3.6a)** represented the full extent of what is achievable at the Site. The measures identified in the final HMP, and supporting Biodiversity Net Gain Report **(EIAR Volume 4, Technical Appendix 3.6c)** and DMP (**EIAR Volume 4, Technical Appendix 3.6d**), were concluded to deliver significant biodiversity enhancements for both the Consented Development and Proposed Varied Development, in line with National Planning Framework 4 (NPF4).

4.1.7. Cumulative impacts of the Proposed Varied Development and three adjacent wind farms were considered for peatland habitats and M11 mire. Through successful implementation of the peatland restoration and reduced grazing outlined in the relevant plans, no significant cumulative effects were identified for the Proposed Varied Development.

4.1.8. A comparison of residual effects of the Proposed Varied Development with the Consented Development was undertaken. Both developments identified significant effects on peatland habitats (blanket bog and wet modified bog) before targeted mitigation was taken into consideration, although no significant residual effects were concluded for these habitats with implementation of targeted mitigation. No significant effects were identified on wet heath for either the Consented Development or Proposed Varied Development.

4.1.9. Overall, through the implementation of embedded and targeted mitigation, compensation, and enhancement measures, the Proposed Varied Development is not expected to result in any new or materially different significant adverse ecological effects compared to the Consented Development. The proposed mitigation, compensation and enhancement align with best practice guidance and statutory policy, ensuring that biodiversity conservation and restoration are integral to the lifecycle of the Proposed Varied Development.

4.2. Ornithology

4.2.1. The EIA includes an Ornithological Impact Assessment (OIA) which considers only the likely changes to the conclusions of the Consented Development as a result of the Proposed Varied Development. Where there is unlikely to be a change to effects to any of the Important Ornithological Features (IOFs)

previously considered, these were scoped out of the OIA for the Proposed Varied Development.

4.2.2. An updated Collision Risk Model (CRM) has been completed to inform a revised assessment of potential collision risk arising from the Proposed Varied Development as collision risk would change due to the alteration of turbine height and associated geometry. Additionally, given that new collision risk data are available from other developments, the cumulative collision risk has also been re-assessed and updated for relevant IOFs.

4.2.3. Greenshank, osprey, golden eagle, goshawk, red kite and white-tailed eagle were scoped into the revised CRM for the Proposed Varied Development. Two additional IOFs, namely greylag goose (*Anser anser*) and peregrine (*Falco peregrinus*) were also scoped into the revised CRM because the increased tip height for the Proposed Varied Development meant that some of the flights recorded during the 2018-20 flight activity surveys were now deemed to be at-risk.

4.2.4. Collision risk to all species scoped into the revised CRM is predicted to be higher for the Proposed Varied Development compared to the Consented Development. However, collision risk is considered to be of Low Magnitude for white-tailed eagle and Negligible for all other species scoped into the revised CRM, with no significant effects in EIA terms predicted for any IOFs.

4.2.5. An updated cumulative collision risk assessment has also been completed for golden eagle and white-tailed eagle, using the revised CRM results for the Proposed Varied Development and CRM results from other developments in the surrounding area. No significant cumulative effects were identified for either species.

4.2.6. Although no significant effects on IOFs were predicted for either the Consented Development or the Proposed Varied Development, mitigation and enhancement measures for black grouse, breeding diver species and breeding golden eagle delivered via the final (2024) Habitat Management Plan (HMP) and Breeding Bird Protection Plan (BBPP) (**EIAR Volume 4, Technical Appendix 3.6i**) for the Consented Development and secured through planning conditions for the Consented Development remain appropriate and effective for the Proposed Varied Development.

4.3. Archaeology & Cultural Heritage

4.3.1. A cultural heritage assessment has been undertaken for the EIA for the Proposed Varied Development, which consider the potential operational impacts that could affect the cultural significance on the setting of an agreed

list of heritage assets for the Proposed Varied Development in comparison with the Consented Development.

4.3.2. With the agreement of consultees, assessment of direct and indirect physical impacts related to construction of the Proposed Varied Development on the fabric of heritage assets within the site boundary has been scoped out of the EIA, as was the case with the 2021 EIAR) and 2022 Additional Information Report (AIR) for the Consented Development.

4.3.3. With regard to operational stage effects, a data gap analysis and 'Stage 1' setting assessment was carried out to identify whether it is likely that the setting of any additional heritage assets to those considered in the 2021 EIAR and 2022 AIR for the Consented Development may be affected during the operational phase as a result of the taller turbines and altered layout of the Proposed Varied Development. No additional heritage assets were identified as requiring detailed assessment.

4.3.4. The location of visualisations, agreed with consultees, illustrative of views towards, across, or from heritage assets considered for setting effects are presented within the EIAR.

4.3.5. Whilst adverse impacts upon the cultural significance of heritage assets surrounding the site are assessed as likely to remain at **minor** effects significance, the impact is of no increased magnitude in comparison with the Consented Development. On this basis no additional mitigation or enhancement measures, beyond those embedded in the design, are warranted. Residual operational effects for the Proposed Varied Development are therefore the same as for the Consented Development. No impact of night time aviation lighting is anticipated upon cultural heritage assets. Conclusions in relation to operational setting effects, including cumulative effects, are the same for the Proposed Varied Development as for the Consented Development.

4.3.6. No significant residual effects of the Proposed Varied Development upon cultural heritage when compared to the Consented Development have been identified throughout the EIA process and as presented in the EIAR.

4.4. Landscape and Visual Impact

Introduction

4.4.1. A landscape and visual impact assessment (LVIA) has been undertaken for the EIA which considers the potential for the Proposed Varied Development to result in material changes to the effects identified for the Consented

Development. The focus of this assessment is on identifying any material change, particularly with respect to the receptors for which significant effects have been previously identified.

Landscape Effects

4.4.2. The assessment of landscape effects considered the potential effects on: Landscape Character Types (LCTs) identified by NatureScot; National Scenic Areas (NSAs); Wild Land Areas (WLAs); and Special Landscape Areas (SLAs). The assessment considered any changes to the landscape baseline since the assessment of the Consented Development.

4.4.3. Landscape effects for the Proposed Varied Development would generally be similar to those of the Consented Development. A localised significant (**Moderate**) effect was identified to LCT 222 – Rocky Moorland Plateau – Inverness. Although there would be an increase in the level of effect within LCT 224 – Farmed and Wooded Foothills, the effect on this Landscape Character Type (LCT) would continue to be not significant. An increased effect is also anticipated for the Loch Ness and Duntelchaig Sensitive Landscape Area (SLA) with a localised significant effect being experienced around Meall Fuar-mhonaidh. However, this is not predicted to affect the role of Meall Fuar-mhonaidh as a landmark when experienced from elsewhere within the SLA, or the appreciation of the Great Glen when seen from its summit.

Visual Effects

4.4.4. Most VPs, settlements, and routes included in the assessment would experience similar visual effects to those previously identified for the Consented Development, several are expected to see an increase in visual effects primarily due to the greater height and prominence of the larger turbines, which will make them more noticeable from certain viewpoints and routes. Although some new significant effects were identified by five VPs, two residential receptors and two routes, for most receptors the increase in turbine size would not change the previously assessed effects such that they would be considered significant.

Cumulative Effects

4.4.5. A Cumulative Landscape and Visual Impact Assessment (CLVIA) considered effects in relation to the presence of other wind farms visible from the same

receptors. The cumulative baseline of application and scoping sites reflects the situation as of 25th September 2025.

4.4.6. Significant cumulative landscape effects are predicted for one LCT and for a localised part of the Loch Ness and Duntelchaig SLA around Meall Fuar-mhonaidh. Effects on other LCTs and the wider SLA are predicted to be not significant. Significant cumulative visual effects are expected at two VPs (VP3 - Meall Fuar-mhonaidh and VP7 - B862 south of Foyers), one residential grouping and two routes. While the addition of the Proposed Varied Development to the cumulative baseline will contribute to increased turbine influence in some areas, it would generally not result in a significant cumulative effect.

Lighting Assessment

4.4.7. Visible lighting is proposed for five of the 15 turbines. The Aviation Lighting Impact Assessment has determined that the effects would be significant from one LCT, one designated area, three VPs, two residential groups and one route. This is largely due to the absence of artificial light within the study area and receptors which would therefore generally be more sensitive to this type of change. It was therefore concluded that the inclusion of lighting on the five turbines included in the strategic lighting scheme would result in significant effects during low light conditions and the hours of darkness. However, the Applicant proposes to engage with aviation stakeholders to agree a lighting solution which may result in a reduced visual effect.

Summary

4.4.8. Overall, the LVIA concludes that the Proposed Varied Development would result in some increased significant effects on landscape character and visual amenity, affecting relatively localised parts of the wider landscape and visual resource. Although there would be some increases in anticipated effects, including some new significant effects, the findings of assessment of the Proposed Varied Development are broadly consistent with the findings assessment of the Consented Development.

4.5. Hydrology and Hydrogeology

4.5.1. A full hydrology and hydrogeology impact assessment has been scoped out of the EIA. However, a hydrology and hydrogeology chapter has been included within the EIAR which provides a comparative review of the Consented and the Proposed Varied Development in relation to water environment receptors,

confirms mitigation requirements and provides updated figures to illustrate any changes.

4.5.2. The hydrology and hydrogeology baseline environment outlined for the Consented Development remains the same as for the Proposed Varied Development. The design of the Proposed Varied Development has ensured the embedded mitigation included in the design of the Consented Development has been retained, including appropriate buffering of watercourses and no change to impacts on Private Water Supplies (PWS). Standard good construction practice has also been considered as embedded mitigation, including detailed pre-construction surveys, agreement and implementation of a Construction Environmental Management Plan (CEMP) (**EIAR Volume 4, Technical Appendix 3.6e**) and Water Quality and Fish Monitoring Plan (WQFMP), including PWS monitoring (**EIAR Volume 4, Technical Appendix 3.6g**), and appropriate design of watercourse crossings as detailed within the 2021 EIAR and updated watercourse crossing schedule (**EIAR Volume 4, Technical Appendix 9.1**).

4.5.3. The revised turbine positions for the Proposed Varied Development allow for a minimum of a 50m buffer from all watercourses / bodies and all track realignments are a minimum 10m away from any waterbody except at water crossings. While some watercourse crossings have been relocated due to track realignments, and some additional minor culverts may be required, no additional major watercourse crossings are required. An updated Watercourse Crossing Schedule for the Proposed Varied Development is provided.

4.5.4. The 2021 EIAR for the Consented Development determined that potential impacts on hydrological and hydrogeological receptors would be negligible to minor adverse and therefore not significant. With the embedded mitigation measures and approved monitoring plans carried forward, it is concluded that the Proposed Varied Development would not introduce any new or intensified effects compared to the Consented Development. Accordingly, the significance of likely effects remain consistent with the findings of the 2021 EIAR.

4.6. Geology & Soils

4.6.1. An assessment has been undertaken for the EIA of the potential effects on geology and soils during the construction, operation and decommissioning phases of the Proposed Varied Development. The assessment considers only effects attributed to differences between the Consented Development and Proposed Varied Development.

4.6.2. Several detailed Ground Investigation & Peat Depth surveys have been undertaken across the Site in support of the Consented Development. Ground investigations were undertaken in 2022, to inform detailed design of the Site

Enabling Works and in 2023 to inform detailed design of the Consented Development main works. This data has been augmented with additional peat depth data gathered in August 2025 in support of the Proposed Varied Development.

4.6.3. Peat has been avoided where possible by the Consented Development. Peat surveys confirmed the average peat depth across the Site to be 0.4m. A site-specific Peat Landslide and Hazard Risk Assessment (PLHRA) undertaken at the Site for the Consented Development has confirmed that there is very low to low likelihood of a peat landslide at the proposed turbine locations and associated infrastructure for the Proposed Varied Development.

4.6.4. An updated Peat Management Plan (**EIAR Volume 4, Technical Appendix 10.1: Peat Management Plan**) has been produced for the Proposed Varied Development, it includes updated excavation and reuse volumes following further peat depth surveying of the Proposed Varied Development. All excavated peat will be re-used and relocated on-site.

4.6.5. Most of the peatland on-site has been confirmed as modified peat, with localised areas of near natural, actively eroding and drained peatland. The Proposed Varied Development avoids areas classified as near natural peatland, taking other on-site constraints into consideration.

4.6.6. Detailed Ground Investigations, undertaken in 2022 ('Enabling Works') & 2023 ('Main Works') support the findings of the original EIAR Baseline. This primarily confirms that the development area consists of bedrock at or close to surface across the majority of the Site, with superficial deposits mainly consisting of shallow peat.

4.6.7. There are no designated areas of protection located within the Site, including Geological Conservation Review (GCR) sites. According to the Zetica website, the Site is within a low Unexploded Ordnance (UXO) risk area.

4.6.8. In relation to geology and soils, the proposed infrastructure and layout changes for the Proposed Varied Development compared to the Consented Development do not change the findings of the 2021 EIAR**.** All standard and

site-specific mitigation measures detailed in the 2021 EIAR remain wholly applicable and relevant to the Proposed Varied Development.

4.6.9. The significance of likely effects therefore remains as assessed in the 2021 EIAR and 2022 AIR and **no significant** effects would arise as a result of the Proposed Varied Development.

4.7. Traffic and Transport

4.7.1. A screening assessment has been undertaken for the EIA to review the potential traffic impact of the Proposed Varied Development when compared to that of the Consented Development, in line with the requirements of the scoping responses.

4.7.2. The Proposed Varied Development will generate marginally less traffic than the Consented Development. This has then been compared against a modern future year baseline traffic estimate.

4.7.3. The Proposed Varied Development will have similar traffic impacts to that of the Consented Development. No further mitigation measures are therefore required.

4.7.4. A review of the Abnormal Indivisible Load (AIL) routes from both Inverness and the Mowi Pier, whicb is located west of the Skye Bridge, near Kyleaki, have been undertaken and the physical measures required are identified in a revised AIL Route Survey Report. A revised Construction Traffic Management Plan (CTMP), based upon the planning conditions associated with the Consented Development has also been produced.

4.7.5. In terms of traffic and transport, the Proposed Varied Development will not result in any significant effects. All traffic effects are temporary and negligible in nature. This is the same as assessed for the Consented Development.

4.8. Socio-Economics, Recreation and Tourism

4.8.1. Effects on socio-economics, recreation and tourism were scoped out of the EIA on the grounds that the increased construction and delivery requirements of the Proposed Varied Development would increase the positive impacts previously identified in the 2021 EIAR for the Consented Development.

4.8.2. Although scoped out of the EIA, to align with Policy 11c of National Planning Policy 4 (NPF4), the Applicant has provided a standalone Socio-Economic Report as a supporting document to the application. The report establishes that the Applicant’s approach, and commitments in the framework of the

Proposed Varied Development, have the potential to create positive economic impact in the Highlands and for Scotland.

4.9. Noise and Shadow Flicker

Noise

4.9.1. An updated operational noise assessment to demonstrate that the Proposed Varied Development would comply with the Consented Development's conditioned noise limit has been produced for the EIA.

4.9.2. The assessment has been carried out in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guide (IOA GPG) as required by the consultation responses and in accordance with current Government Policy and best practice.

4.9.3. The operational noise assessment considered the worst-case of four potential turbine models and concluded that the Proposed Varied Development would comply with the Consented Development's conditioned noise limit.

4.9.4. In conclusion, operational noise effects, including cumulative effects, are considered to be not significant. This is the same as assessed for the Consented Development.

Shadow Flicker

4.9.5. A detailed assessment is not required for the EIA, but as requested by The Highland Council (THC) shadow flicker should be considered within the EIAR submission.

4.9.6. As with the Consented Development, it is confirmed within the EIAR that the effects of shadow flicker are **n**ot significant.

4.10. Climate Change

4.10.1. An updated carbon calculator to support the EIA for the Proposed Varied Development, demonstrates that the Proposed Varied Development will result in a reduced payback period when compared to the Consented Development. The Proposed Varied Development will provide an even greater contribution to renewable energy targets and carbon savings when compared to the Consented Development.

4.11. Aviation and Radar

4.11.1. An assessment has been undertaken of the potential effects on aviation and radar during the construction, operation and decommissioning phases of the Proposed Varied Development in comparison to the Consented Development.

4.11.2. The increased turbine tips heights from 180m to 230m have meant that an additional aviation lighting assessment will be required. The assessment, carried out by Wind Farm Low Flying Aviation Consultants (WFLFAC), proposed visible lighting to be installed on five wind turbines (which is a change from the Consented Development which had no requirement for any visible lighting) and MoD specification infra-red aviation lights to be installed on all 15 wind turbines.

4.11.3. The impacts to aviation and radar receptors during the construction, operation and decommissioning phase of the Proposed Varied Development are assessed in the EIAR as **negligible** and therefore not significant, with the implementation of a revised lighting scheme and standard mitigation.

4.12. Other Issues

Forestry

4.12.1. Due to the absence of woodland-level impact, it is concluded that the works do not constitute woodland removal under Scottish Forestry definitions. On this basis compensatory planting is not deemed to be required and no further assessment was required.

Telecommunications

4.12.2. Due to potential for the Proposed Varied Development to encroach on the Line of Sight of an existing telecommunications link, restrictions to micrositing allowance on three turbines (T8, T9 and T16) have been agreed with the Joint Radio Company.

5. Schedule of Environmental Commitments and Residual Effects

5.1.1. Chapter 16 of the EIAR contains a schedule of environmental commitments which will be used as part of the implementation of the Proposed Varied Development. The schedule remains mostly unchanged from the schedule submitted for the Consented Development. A revised aviation lighting scheme is required to address the requirement for visible lighting and mitigation measures are expected to be agreed with the CAA.

5.1.2. Chapter 17 of the EIAR describes the Summary of Residual Effects of the Proposed Varied Development, which has been carried out in accordance with regulatory requirements and guidance on good practice. The findings of the surveys undertaken, in addition to consultation, have informed the design process and assessment. Design modifications and pre-construction, construction and operational mitigation have been implemented to remove and reduce significant adverse effects.

5.1.3. With the exception of some visual and landscape effects, there is no change to the significance of residual effects on any environmental aspect assessed within the EIAR for the Proposed Varied Development compared to the Consented Development

6. Next Steps

6.1.1. The ECU will consider the Section 36C application and the findings of the EIA. As part of the decision-making process, the ECU will consult a number of consultees including the Highland Council, NatureScot and SEPA, and will consider all representations received from other parties including members of the public.

6.1.2. Any public representations to the application may be submitted via the ECU website at www.energyconsents.scot/Register.aspx; by email to the Scottish Government, Energy Consents Unit mailbox at representations@gov.scot; or by post to the Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU, identifying the proposal and specifying the ground