

Appendix 3.4 Gatecheck 2020 Responses

Contents

Historic Environment Scotland (HES)

Highland and Islands Airports Limited (HIAL)

NatureScot

ScotWays

Scottish Environment Protection Agency (SEPA)

The Highland Council (THC)

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HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: [REDACTED]

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

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

[REDACTED]
[REDACTED]

Our case ID: 300037514

24 November 2020

Dear Energy Consents Unit

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)
[Bhlaraiddh Wind Farm Extension, Invermoriston](#)
[EIA Gatecheck Report \(November 2020\)](#)

Thank you for your consultation regarding the EIA Gatecheck Report (November 2020) for the Bhlaraiddh Wind Farm Extension in the Scottish Highlands. We have reviewed the Report for our historic environment interests. That is, scheduled monuments and their setting, category A listed buildings and their setting, and gardens and designed landscapes and battlefields appearing in their respective Inventories.

The Highland Council's Historic Environment Team (HET) will also be able to offer advice on the EIA Gatecheck Report (November 2020).

EIA Gatecheck Report (November 2020)

We have reviewed the EIA Gatecheck Report (November 2020) for our historic environment interests and can confirm that we are broadly content with the summary of our engagement on this project so far. It should be noted, however, that we have recently undertaken further engagement (e-mail 21 September 2020) with the applicant on the identification of viewpoints for assessment visualisations. In addition to the provision of a wireframe view from Levishe Cottage (SM4567), we have highlighted a requirement for visualisations demonstrating impacts on the setting of Urquhart Castle (SM90309). In line with this, we have suggested a viewpoint from the northern shore of Loch Ness looking south-west towards the castle and a viewpoint from the far side of Loch Ness looking across to the castle. We also highlighted a requirement for a visualisation viewpoint taken from the cruise boats that operate along Loch Ness.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is [REDACTED] and they can be contacted by phone on [REDACTED] or by email on [REDACTED]

Yours faithfully,

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH
Scottish Charity No. **SC045925**
VAT No. **GB 221 8680 15**

[REDACTED]

From: [REDACTED]
Sent: 17 November 2020 14:52
To: [REDACTED]
Subject: [EXTERNAL] Bhlaraidh Wind Farm proposal - Gatechecking

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Good afternoon [REDACTED]

Bhlaraidh Wind Farm proposal - Gatechecking

Below is the 'gatechecking response' from HIAL. We can discuss this further when we have a 'sweeping up chat' after the deadline for responses has passed.

If you have any queries in the meantime please do not hesitate to contact me.

Regards

[REDACTED]

[REDACTED]

Consents Manager | Energy Consents Unit
The Scottish Government | [REDACTED]

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From: [REDACTED] >
Sent: 12 November 2020 10:43
To: [REDACTED] >
Subject: RE: Bhlaraidh Wind Farm proposal

Dear [REDACTED]

Thank you for your e-mail.

HIAL note that the Gatecheck Report states '*Impact on aviation radar has been taken into consideration during the detailed design process. The Proposed Development will not be visible to HIAL radar infrastructure*'.

HIAL have not had any engagement with the developer since submission of our scoping response. Should the development parameters remain the same, HIAL would require evidence to be provided to demonstrate that the development will not impact our radar infrastructure.

Best regards,

Safeguarding Team
Highlands and Islands Airports Limited
Head Office, Inverness Airport, Inverness IV2 7JB
✉ safeguarding@hial.co.uk 🌐 www.hial.co.uk

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[REDACTED]

From: [REDACTED]
Sent: 26 November 2020 09:04
To: [REDACTED]
Subject: FW: Bhlaraidh Wind Farm Extension proposal - Gatecheck 1

From: [REDACTED] >
Sent: 26 November 2020 08:52
To: [REDACTED] >
Cc: [REDACTED] >
Subject: [EXTERNAL] Bhlaraidh Wind Farm Extension proposal - Gatecheck 1

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Good morning [REDACTED]

Below is NatureScot's response to the Gatecheck Report sent to them on 11 November 2020.

If you have any queries please do not hesitate to contact me.

Regards

[REDACTED]

[REDACTED]
Consents Manager | Energy Consents Unit
The Scottish Government | [REDACTED]

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From: [REDACTED]
Sent: 25 November 2020 18:39
To: [REDACTED]
Subject: RE: Bhlaraidh Wind Farm proposal

Dear [REDACTED]

Thank you for consulting us on the above Gatecheck Report.

At scoping we raised three key areas which we considered might each be of national interest and lead to NatureScot raising an objection. These key issues were the potential impacts on birds, landscape and visual interests and carbon rich soils, deep peat and priority peatland habitat.

We note that the consultation process is far from complete and this is acknowledged in the Gatecheck Report.

For example, against NatureScot entries in the ornithology section the response states: "Further consultation regarding the scope of connectivity with respect to breeding SPA Slavonian grebe to be undertaken following the conclusion of the 2020 scarce breeding bird surveys."

And under the landscape and visual section:

- “Consultation is ongoing with NatureScot to confirm viewpoints to be assessed (refer to Appendix B).”
- “Further consultation to be undertaken with respect to cumulative, lighting and Wild Land Assessment.”
- “The scope of the lighting assessment will be discussed in future consultation, including viewpoints for low lighting visualisations.”

And under Geology and Soils (Carbon rich soils, deep peat and priority peatland habitat):

- “Further consultation required with NatureScot”

We question the value of undertaking a Gatecheck exercise when so much further consultation is required. We would advise that a second gatecheck is undertaken once consultation is complete as only at that point can consultees make meaningful comments on the agreed scope of the EIA.

Kind regards,

██████████ | **Renewable Energy Casework Adviser**

NatureScot | Silvan House, 231 Corstorphine Road, Edinburgh EH12 7AT ██████████

NatureScot, Taigh Silvan, 231 Rathad Chros Thoirphin, Dùn Èideann EH12 7AT | ██████████

nature.scot | @nature_scot | *Scotland's Nature Agency | Buidheann Nàdair na h-Alba*

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The Registered Office of SSE Renewables Holdings Limited and SSE Airtricity Limited is Red Oak South South County Business Park Leopardstown Dublin 18 Ireland

Registered in Ireland No. 314061 and 317386

www.sseairtricity.com

Directors: Mark Ennis (British), Jim Smith (British), Stephen Wheeler, Barry O'Regan, Yvonne Burke

[REDACTED]

From: [REDACTED]t
Sent: 25 November 2020 13:18
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Bhlaraidh Wind Farm proposal - Gatecheck 1

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Good afternoon [REDACTED]

Below is ScotWays' response to the Gatecheck Report sent to them on 11 November 2020.

If you have any queries please do not hesitate to contact me.

Regards

[REDACTED]

[REDACTED]
[REDACTED] | Energy Consents Unit

The Scottish Government [REDACTED]

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From: [REDACTED]
Sent: 25 November 2020 12:11
To: [REDACTED]
Subject: Re: Bhlaraidh Wind Farm proposal

Good afternoon [REDACTED],

Thank you for your email regarding the Gatecheck for the Bhlaraidh Wind Farm proposal. ScotWays have no further comment to make at this moment.

Kind regards

[REDACTED]
[REDACTED]
[REDACTED]
Scottish Rights of Way and Access Society (ScotWays)
24 Annandale Street, Edinburgh EH7 4AN
tel/fax: [REDACTED]
web: www.scotways.com
follow us on Twitter: @ScotWays
find us on Facebook: www.facebook.com/scotways

It's our 175th Anniversary! follow #ScotWays175 for details

Safeguarding Public Access in Scotland since 1845

A company limited by guarantee, registered in Scotland

Company number 24243
Registered office as above
Scottish Charity number SC015460

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[REDACTED]

From: [REDACTED]
Sent: 12 November 2020 15:50
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] RE: Bhlaraidh Wind Farm proposal - Gatecheck report

Follow Up Flag: Follow up
Flag Status: Flagged

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SEPA email response PCS/173870

Dear [REDACTED]

Thank you for your email below. The content of the EIA Gate-check report is noted and the responses the developer provides generally seem reasonable.

However as you know we now encourage developers to fully engage with us at the pre-application stage to try and ensure that our issues are taken on board early on in the process when they are easiest to address and to try, where possible, to avoid formal objections from us at a later stage. The developer did share the phase 1 peat probing and National Vegetation Classification survey results with us back in June and we had a useful meeting then as well. However a number of the issues we highlighted in our response then have not been addressed and we have not had an opportunity to provide pre-application advice to the current layout and the potential impacts it will have on the aspects of the environment in which we have an interest.

Prior to the formal submission of the application I would therefore strongly encourage the developer to consult us further on the project with, as a minimum, the following three layout plans (or sets of layout plans – they must be at a scale where the information is easy to understand) showing all permanent and temporary works: (1) 50 m buffers to watercourses, (2) NVC survey results, and (3) all peat probing results (showing the location of individual peat probes, colour coded for depth).

We would also be very happy to provide advice on any updated GWDTE assessment or other work on peat such as the Peat Management Plan if this would be helpful.

Kind regards

[REDACTED]

[REDACTED]

Planning Service, SEPA, Graesser House, Dingwall Business Park, Dingwall IV15 9XB

Mobile: [REDACTED]

[REDACTED]

Our planning guidance: www.sepa.org.uk/environment/land/planning/

From: [REDACTED]
Sent: 11 November 2020 13:34
To: [REDACTED]

Cc: [REDACTED]

Subject: Bhlaraidh Wind Farm proposal

Dear Consultee

Bhlaraidh Wind Farm Extension proposal

In July 2019 your organisation was asked to comment on a Scoping Report regarding the above proposal. A Scoping Opinion was subsequently produced containing advice and guidance and a copy of all the consultation responses received to the consultation undertaken at that time. ITP Energised, on behalf of SSE Renewables Wind Farms (UK) Limited, have now produced a Gatecheck Report which covers the various issues raised in the Scoping Opinion. A copy of the Gatecheck Report is attached.

Can you please consider the contents of the Gatecheck Report specific to your organisation and provide any further comment you may have on the contents.

What we are looking for is whether, in relation to your organisation, you believe the contents of the Gatecheck Report accurately reflect the position as you see it, whether you believe that the Developer is proposing the best plan of action and whether you believe that the Developer has engaged appropriately with you.

Please send your response to [REDACTED] within 14 days of the date of this email.

If you have any queries in the meantime or you require a copy of the Scoping Opinion please do not hesitate to contact me.

Yours faithfully

[REDACTED]
[REDACTED] | Energy Consents Unit

The Scottish Government | [REDACTED]

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[REDACTED]

From:

Sent:

[REDACTED]
12 November 2020 17:05

To:

Cc:

[REDACTED]
[EXTERNAL] RE: Bhlaraidh Wind Farm proposal

WARNING: this email has originated from outside of the SSE Group. Please treat any links or attachments with caution.

Good Afternoon [REDACTED]

Thank you for the opportunity to comment on the Gatecheck Report for Bhlaraidh Extension. Please accept the comments below as the response from The Highland Council.

It is noted that the applicant has committed to a number of further consultations with The Highland Council on matters including, but not limited to cumulative baseline, photomontages for cultural heritage and noise.

The application will require to be accompanied by visualisations and an assessment to consider the impacts on receptors during hours of darkness due to the aviation lighting which will be required as a result of the turbine heights.

We would welcome clarity on whether the impacts on the golden eagles in NHZ10 will be considered as part of the EIA and any mitigation measures to be brought forward to address impacts of the development.

While not specifically highlighted in our scoping response, we would welcome clarity on whether surveys and mitigation will be identified for water voles given their prevalence within the site during the construction of the original wind farm.

Chapter 10 sets out that a PWSRA will be included in the EIA or scoped out. I would request clarity on that due to the modifications to the water supplies as a result of the original wind farm.

While the Noise section of the gatecheck report highlights that a detailed noise assessment will be carried out it is important that this considers cumulative impacts with the original wind farm and other wind farms in the area.

The Transport chapter of the EIAR must consider the impacts of nighttime deliveries of turbines if these are proposed.

Highland Council policy requires the submission of an Outline Access Management Plan with the application. It is requested that this is provided as a technical appendix to chapter 14 of the EIAR and the final version of the AMP can be subject to condition is the Scottish Ministers approve the development.

I would be happy to attend a gatecheck meeting prior to the submission of the application, if required.

Please do not hesitate to contact me if you require further comment.

Kind regards,

[REDACTED]

Development and Infrastructure Service
Council Headquarters

Glenurquhart Road
Inverness
IV3 5NX

Please note I am currently working remotely, therefore please contact me via email in the first instance or via Skype.

This advice is given without prejudice to the future consideration of and decision on any application received by The Highland Council

Thathar a' toirt seachad na comhairle seo gun chlaon-bhreith do bheachdachadh air agus co-dhùnadh a thaobh tagradh sam bith a tha Comhairle na Gàidhealtachd a' faighinn san àm ri teachd

From: [REDACTED]

Sent: 11 November 2020 13:34

To: [REDACTED]

Subject: Bhlaraidh Wind Farm proposal

Dear Consultee

Bhlaraidh Wind Farm Extension proposal

In July 2019 your organisation was asked to comment on a Scoping Report regarding the above proposal. A Scoping Opinion was subsequently produced containing advice and guidance and a copy of all the consultation responses received to the consultation undertaken at that time. ITP Energised, on behalf of SSE Renewables Wind Farms (UK) Limited, have now produced a Gatecheck Report which covers the various issues raised in the Scoping Opinion. A copy of the Gatecheck Report is attached.

Can you please consider the contents of the Gatecheck Report specific to your organisation and provide any further comment you may have on the contents.

What we are looking for is whether, in relation to your organisation, you believe the contents of the Gatecheck Report accurately reflect the position as you see it, whether you believe that the Developer is proposing the best plan of action and whether you believe that the Developer has engaged appropriately with you.

Please send your response to [REDACTED] within 14 days of the date of this email.

If you have any queries in the meantime or you require a copy of the Scoping Opinion please do not hesitate to contact me.

Yours faithfully

[REDACTED]
[REDACTED] | Energy Consents Unit

The Scottish Government | [REDACTED]

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