

Bhlaraidh Wind Farm Extension Section 36C Variation

Technical Appendix 3.4: Gatecheck 1 Report

Scottish Government - Energy Consents Unit - Application
Details



Bhlaraidh Extension Section S36C Variation

**Scottish Government Energy Consents Unit
Stage 1 Gatecheck Report**

Document Classification | **Public**



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Document Review

Version	Author	Reviewer	Approver	Date
REV 01	Tina Cordner	Jane Macdonald	Ian Stewart	9/9/2025

1. Introduction

1.1. Application Summary

- 1.1.1. This Gate Check 1 Report has been prepared by SSE Generation Ltd ('the Applicant') for the Energy Consents Unit (ECU) department of the Scottish Government. The report is submitted in advance of an application to be made under Section 36C of the Electricity Act (1989) for consent to construct and operate the Bhlaraidh Wind Farm Extension ('the Proposed Varied Development'). The Applicant intends to submit the application to the ECU in November 2025.
- 1.1.2. This Section 36C Gate Check 1 Report provides the ECU with an update on the status of the Proposed Varied Development and progress with the EIA Report. It summarises the design iteration process which the Applicant has undertaken to date and how the Applicant has engaged with consultees. It summarises the responses received within the EIA Scoping Opinion and details how the Applicant intends to respond to these.
- 1.1.3. The Applicant submitted an EIA Scoping Report for the Proposed Varied Development in May 2025. The Applicant received an EIA Scoping Opinion in July 2025 (See Appendix A).

1.2. Proposed Varied Development

- 1.2.1. The Proposed Varied Development is situated on the Glenmoriston Estate, north-west of Invermoriston in the Great Glen within the Highland Council Local Planning Authority Area (refer to **Figure 1.1 Site Location Plan**). The application will be supported by an Environmental Impact Assessment (EIA) Report as required by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 as amended (the EIA Regulations).
- 1.2.2. The Proposed Varied Development lies immediately to the east of SSER's Operational Bhlaraidh Wind Farm, which was consented in 2014, constructed in 2017, and comprises 32 No. turbines with an installed capacity of 108 MW (Planning Ref: 12/02556/S36).
- 1.2.3. The Applicant previously obtained Section 36 Consent in August 2022 for the Bhlaraidh Extension Wind Farm, the "*Consented Development*", which comprises a total of 15 turbines with an expected installed capacity of 83 megawatts (MW) (Planning Ref: 21/04080/S36 and ECU Section 36 Case Ref: ECU00001900).
- 1.2.4. The Applicant is now proposing to apply to vary the Section 36 consent under Section 36C of the Electricity Act 1989, and The Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013, together with a direction under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997. The application

and proposals will also follow the Energy Consents “*Applications for Variation of Section 36 Consents Guidance*”¹.

1.2.5. The proposed varied scheme, and the application under Section 36C and Section 57(2), are hereinafter referred to as the “*Varied Development*” and the “*Variation Application*” respectively. The proposed variations to the Consented Development are illustrated on **Figure 1.2 Site Layout Plan**.

1.2.6. The Proposed Varied Development layout as illustrated on **Figure 1.2** would comprise of 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 13.5km upgraded existing access track and 7.9km of new access track. (Approx 1.5km built during Enabling Works);
- An on-site substation, welfare building and store;
- A network of underground cabling to connect each wind turbine to the on-site substation;
- 6 No. Watercourse and culvert crossings (one of which already constructed as part of site enabling works);
- 7 No. Borrow Pits (2 utilised during Enabling Works, 5 potentially utilised during Main Works)
- A LiDAR unit to collect meteorological and wind speed data;
- Batching plant facilities for temporary on site concrete batching;
- Up to 3 No. site compound areas, including welfare facilities, site cabins, storage and parking; and
- Any other associated ancillary works required.

¹ [Energy consents: applications for variation of section 36 consents guidance - gov.scot](https://www.gov.scot/publications/energy-consents-guidance/pages/section-36-consents-guidance.aspx)

2.Design Iterations

- 2.1.1. An indicative Site Layout for the Proposed Varied Development was presented in the Scoping Report submitted in May 2025. Since the submission of the Scoping Report and the receipt of the EIA Scoping Opinion, the Applicant has not made any further design iterations. However, there have been a number of design iterations in the history of the Bhlaraídh Extension Wind Farm project.
- 2.1.2. The criteria used in the initial assessment to determine the suitability of the Site for the Bhlaraídh Extension Wind Farm and the subsequent design process to determine the layout of the Consented Development, including alternatives considered and layout evolution, are described in the following documents submitted as part of the Section 36 application and Environmental Impact Assessment Report (EIAR) and Additional Information Report (AIR):
- Design & Access Statement, August 2021;
 - Chapter 2: Design Iteration and Proposed Development, EIAR 2021; and
 - Chapter 2: Design Iteration and Proposed Development, AIR 2022.
- 2.1.3. The granting of the Section 36 consent for the 15 turbine development in 2022 (the Consented Development), has confirmed the suitability of the Site for a large-scale wind farm. As the Proposed Varied Development only involves variations within the Consented Development Site, no further information on site selection is required.
- 2.1.4. The Applicant was fully committed to commencing construction of the Consented Development in early 2025 and undertook a large amount of detailed design work to prepare for construction. This included two stages of detailed ground investigations to inform the detailed design, and the Site Enabling Works civil works package was completed in 2024 which included construction of the substation platform and associated section of access track. All information gathered as part of this pre-commencement detailed design stage has been utilised in the iterative design review process for the Proposed Varied Development.
- 2.1.5. The primary aim of the design review process was to avoid or minimise changes to the Consented Development layout wherever possible. The secondary aim was to ensure any necessary relocation and/or re-orientation of turbines and crane hardstands and minor track alignments resulted in a reduction in earthworks and a positive or neutral environmental effect wherever possible.
- 2.1.6. The layout of the Consented Development turbine locations was initially reviewed in detail to determine the viability of the consented location with an increased tip height from 180m (the consented tip height) to up to 230m. As safe topple distances increase with turbine height, turbines closest to the constructed substation platform were considered first. Other turbines were then reviewed to ensure the locations maintained required topple distances, wind energy yield, wake and turbulence effects. Where movements were required, all key engineering and environmental constraints and opportunities were considered to select an optimum location and/or revised alignment

which minimises earthworks and environmental effects. Information considered included available data relating to:

- Turbine specification requirements for foundations, hardstands and track approach angles and gradients at each turbine location;
- Topography;
- Geology;
- Landscape and visual;
- Cultural heritage setting;
- Radio links;
- Aviation safety;
- Watercourse buffers and watercourse crossings;
- Habitat and species; and
- Peat depth and peatland condition.

2.1.7. The design chill layout presented in the Scoping Report was further reviewed following receipt of the Scoping Opinion (including all consultation responses as summarised in Section 3 below) and feedback from the first public exhibition. This review did not identify any required design refinements.

2.1.8. A further peat probing site survey was undertaken in August 2025 to provide the required density of peat survey data at all locations where turbines or infrastructure have been repositioned. This additional peat survey data did not indicate any further layout revisions were required as all changes presented in the Scoping layout were on shallower or similar depth of peat.

3. Scoping

3.1. Introduction

3.1.1. In accordance with Regulation 12 of the EIA Regulations, the Applicant sought a scoping opinion, accompanied by a Scoping Report, from the Scottish Ministers on the environmental information to be provided in the EIAR. The Scoping Report describes the Proposed Varied Development and identifies the issues proposed to be included in the EIAR and proposed an approach to the assessment of effects in each case.

3.2. Scoping Consultation

3.2.1. Scottish Ministers issued the Scoping Report to a pre-agreed list of statutory and non-statutory consultees. A Scoping Opinion was received from the Scottish Ministers on 16th July 2025. The organisations listed in **Table 3.1** were contacted as part of the Scoping process and invited to provide feedback. The Scottish Minister's Scoping Opinion, all Scoping consultation responses, and copies of all other key pre- or post-scoping consultation correspondence is included as **Appendix A**.

Table 3.1 Scoping Consultee List

Consultee	Scoping Response Received?	Additional Scoping Consultation (refer Table 3.2)?
Statutory Consultees		
SEPA	Yes	No
The Highland Council	Yes	Yes
NatureScot	Yes	Yes
Historic Environment Scotland	Yes	No
Internal Scottish Government Advisors		
N/A	N/A	N/A
Non-Statutory Consultees		
British Horse Society Scotland	Yes	No
BT	Yes	No
Cairngorms National Park Association	Yes	No
Defence Infrastructure Organisation (MOD)	Yes	Yes
Fisheries Management Scotland	Yes	No
Health and Safety Executive	Yes	No
Highland and Islands Airports Limited (HIAL)	Yes	No
Joint Radio Company (JRC)	Yes	Yes
OFCOM	Yes	No
Office for Nuclear Regulation	Yes	No
Scottish Gas Networks (SGN)	Yes	No
Scottish Water	Yes	No
The Coal Authority	Yes	No
The Met Office	Yes	No
Transport Scotland	Yes	No

Consultee	Scoping Response Received?	Additional Scoping Consultation (refer Table 3.2)?
Civil Aviation Authority - Airspace (use this for WIND FARMS)	No	Yes
Crown Estate Scotland	No	No
Friends of the Earth (Scotland)	No	No
Highland and Islands Enterprise	No	No
Internal Scottish Government Advisors	No	No
Inverness Chamber of Commerce	No	No
John Muir Trust	No	No
Mountaineering Scotland	No	No
NATS Safeguarding	No	No
RSPB Scotland	No	No
Scottish & Southern Electricity Networks (SSE)	No	No
Scottish Canoe Association	No	No
Scottish Forestry	No	No
Scottish Rights of Way and Access Society (ScotWays)	No	No
Scottish Wild Land Group (SWLG)	No	No
Scottish Wildlife Trust	No	No
Visit Scotland	No	No
WWF (Scotland)	No	No
District Salmon Fisheries Board - Beaulay	No	No
District Salmon Fisheries Board – Ness	No	No
Fisheries Trust - Ness & Beaulay Fisheries Trust	No	No
Community Councils		
Fort Augustus & Glenmoriston Community Council	No	No
Glenurquhart Community Council	No	No

Consultee	Scoping Response Received?	Additional Scoping Consultation (refer Table 3.2)?
Strathglass Community Council	No	No

3.3. Scoping Responses

- 3.3.1. Table 3.2 provides a summary of the proposed EIA scope, scoping consultation responses for each of the key environmental issues identified during scoping and a summary of further consultation clarifications sought and proposed EIAR approach in response.

Table 3.2: EIA Scoping Opinion Responses Summary

Planning Policy			
Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIA Scope
<p>Scoped In</p> <p>The EIAR will include a chapter which will identify the relevant energy and planning legislation and policy considerations relating to the Proposed Varied Development.</p> <p>The EIAR will be accompanied by a standalone Planning Statement</p>	The Highland Council	The scope of the EIA should address all the relevant issues covered within NPF4, HwLDP, IMFLDP2, and Highland Council Supplementary Guidance.	No response required. As per Proposed EIAR Scope
Ecology			
Proposed EIA Scope	Consultee	Consultee Comment	SSER Response to Consultee/ EIA Scope
<p>Scoped In</p> <p>Habitats comparison review and comparative Habitat Loss Calculations.</p>	The Highland Council	Additional protected species surveys should be undertaken if surveys more than two years old. However the Council agrees with SSER approach in general.	<p>NatureScot guidance on proposals on variation of a Section 36 consent states that <i>"In most situations the existing ecological survey information can be relied upon for section 36C applications. We will usually only recommend new survey in relation to the variation when there could have been a substantive change to environmental circumstances which could contribute to new or intensified significant effects."</i>With the exception of habitats and potentially bats, SSER assert that the proposed variation is not likely to change conditions to an extent that new or intensified effects will be experienced by important ecological features. Based on this SSER do not feel that updated baseline surveys are necessary and that the surveys completed to date, as outlined in the Scoping Report, are sufficient.</p> <p>RPS on behalf of SSER have issued a letter dated 13th August seeking clarification on NatureScot's position regarding the use of existing field survey information. This requested confirmation that the use of existing protected species data is suitable for a decision to scope impacts on protected species, with the exception of bats out of the impact assessment.</p>
<p>Scoped Out</p> <p>Protected species - scoped out as no change or impact on new habitat that might affect species (terrestrial or aquatic). All previously agreed mitigation set out in the 2021 EIAR and 2022 AIR, along with Species Protection Plans submitted and approved to satisfy pre-commencement planning conditions will remain unchanged.</p>		<p>The scoping report refers that a Habitat Management Plan (HMP) which was approved in 2024 to satisfy planning condition 18. The HMP must be revised and comply with the Highland Council's Biodiversity Enhancement Planning Guidance. The Ecology Officer supports the proposed measures to enhance habitat for black grouse and golden eagle, creation of montane scrub, planting of Caledonian woodland, installation of artificial rafts for divers, and an enhancement with the Regional Eagle Conservation Management Plan. As the area is important for black grouse, fence removal/markings to reduce collision risks to this species, as well as regular checks and collision reporting to be implemented is recommended.</p> <p>Protected species are proposed for scoping out, on the basis that no significant change on impacts. Should updated protections species establish a new baseline the scoping decision should be reassessed. Scoping out acceptable if data remains the same.</p>	

Scottish Ministers	Scottish Ministers recommend that the EIAR should provide a new baseline where appropriate for the survey of birds and animal (mammals, reptiles, amphibians, etc.) interests on site. As THC advises, it will need to be categorically established what species are present on the site, and where, before a future application is submitted.	The impacts on bats will be assessed as part of the EIAR in light of changes to buffers and turbine parameters. ¹ https://www.nature.scot/doc/guidance-dealing-proposals-variation-section-36-wind-farm-consents
Naturescot	<p>Bats: - Increased blade height (by 50m) may impact bats. Buffer zones need reassessment.</p> <p>Peatland Habitat:- Assessment of land take effects on sensitive peatland habitats is welcomed. Updated habitat calculations comparing proposed vs consented development are required.</p> <p>Protected Areas:- River Moriston SAC and Levishie Wood SSSI impacts can be scoped out if mitigation remains valid.</p>	

Ornithology			
Proposed EIA Scope	Consultee	Consultee Comment	SSER Response to Consultee / EIAR Scope
<p>Scoped In</p> <p>Updated collision risk model. This will be completed for all previously agreed and assessed Important Ornithological Features (IOFs)* and comparative EIA.</p> <p>Scoped Out</p> <p>Disturbance, displacement and habitat loss effects on ornithological receptors during construction, operation and decommissioning. As with protected species, no significant impacts were previously predicted following implementation of agreed mitigation and approved Breeding Bird Protection Plan.</p>	The Highland Council	<p>Baseline Data Concerns</p> <p>Flight activity data from Oct 2018–Aug 2020 is too old per NatureScot guidance (data >5 years is invalid) and updated vantage point surveys are required (typically 2 years unless justified). Cnfrmed that the timing of other surveys (e.g. raptors, moorland birds, divers, grouse leks) is unclear, so baseline validity cannot be confirmed.</p> <p>Scoping Out Effects</p> <p>Effects like disturbance, displacement, and habitat loss may be scoped out only if baseline data is valid.If new surveys are conducted, these effects must be reconsidered in the EIA.</p>	<p>As detailed in the Scoping Report, we have considered Nature Scot (2024) guidance on proposals for the variation of section 36 wind farm consents², which states that, “<i>For birds, in the majority of cases where the number and location of turbines are not changing, all that will be needed is a re-working of the collision risk model, rather than new survey work.</i>”</p> <p>The collision risk modelling calculations will be updated for the relevant bird species to inform an updated assessment of the impacts of collision mortality on these species, both from the Proposed Varied Development alone and cumulatively with other developments in the same Natural</p>

² NatureScot (2024). Guidance on dealing with proposals for the variation of section 36 wind farm consents.

heritage Zone (NHZ).

Impact Assessment Methods

Use of the Band collision risk model (per 2021 EIA guidance) is supported. Must include review of updated avoidance rates.

Cumulative Impacts & Local Data

Updated CRM must assess cumulative impacts from other proposals in the same Natural Heritage Zone.

Consultees are asked to share recent or unpublished records/projects relevant to the site.

Scottish Ministers

Scottish Ministers recommend that the EIAR should provide a new baseline where appropriate for the survey of birds and animal (mammals, reptiles, amphibians, etc.) interests on site. As THC advises, it will need to be categorically established what species are present on the site, and where, before a future application is submitted.

NatureScot

Collision risk modelling is required for six bird species due to larger turbines and consideration of cumulative effects must be given

Archaeology & Cultural Heritage

Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scoped in Cumulative wind farm context Indirect setting effects on cultural heritage assets	THC	THC confirmed that Historic Environment Scotland (HES) will comment on methodology, scope, and potential impacts in its consultation response. THC's Historic Environment Team (Archaeology) are satisfied with the methodology provided in the Scoping Report, including the proposed figures and viewpoint locations. They are satisfied that the matters Scoped Out, including direct impacts to undesignated assets, remain appropriate for this redesigned application.	No response required. All comments have been reviewed and will be taken into account in the EIAR scope.
Scoped Out			

Direct impacts on archaeology or cultural heritage assets during construction	Scottish Ministers	<p>Historic Environment Scotland (HES) requests that a comparative review of ZTVs for the Consented Development and the Proposed Varied Development is undertaken to identify any heritage assets that may be affected</p> <p>THC's Historic Environment Team (Archaeology) are satisfied with the methodology provided in the Scoping Report and have deferred agreement of the scope of supporting cultural heritage visualisations for setting effects to HES</p>
	HES	<p>Reference is made to Scheduled Monument Achratagan Hut Circle but concludes that no further assessment is required.</p> <p>Wirelines:- used to assess viewpoints for Urquhart Castle and Levishie Cottage fort - should align with original viewpoints in EIA. Comparative wirelines required.</p> <p>Heritage Assets:- Views toward heritage assets (not just from them) should be included in the impact analysis. This may include assets outside the ZTV.</p> <p>ZTV:- should be used to identify assets potentially affected by visual impacts. The updated ZTV reflecting new turbine height is positively acknowledged. A comparative map (original vs. current visibility) is especially helpful.</p>

LVIA

Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
<p>Scoped In</p> <p>Include an update on any changes to the baseline context compared to the 2021 EIAR and 2022 AIR.</p> <p>Consideration of effects within LCT 222 (Rocky Moorland Plateau)</p> <p>Assessment of the direct effect of potential physical change to landscape elements and experiential effects on the character of the Development Site and surrounding areas.</p> <p>Protected Landscapes to be included in assessment include :Glen Affric NSA; WLA 19: Braeroy – Glenshirra – Creag Meagaidh; WLA 24: Central Highlands; Loch Ness and Duntelchaig SLA</p> <p>10 VPs proposed to be scoped in</p> <p>Focus on those receptors where impacts of Minor-Moderate or higher were identified for the Consented Development</p> <p>Further consultation with CAA will be undertaken to establish the requirements for turbine lighting and an assessment of night-time impacts on landscape and visual receptors will be carried out. This will be supported by night-time visualisations from two VPs; Old Bridge, Invermoriston (VP2) and Suidhe Viewpoint, B862 (VP5).</p> <p>Cumulative impacts will be assessed</p> <p>45 km study area is still considered appropriate</p>	<p>THC</p> <p>45km radius agreed. The finalised list of Viewpoints (VP) and wireframes for the assessment of effects of a proposed development must also be agreed in advance of preparation of any visuals with THC and NatureScot. THC states that Community Councils may request additional VPS and that pre-app feedback from them should be taken into account.</p>	<p>Email sent to THC to confirm that VPS agree with NatureScot No Scoping consultation responses were received from Community Councils.</p>	
	<p>Scottish Ministers</p>	<p>Must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.</p>	<p>No response required</p>
	<p>NatureScot</p>	<p>Protected landscapes:- Glen Affric NSA, WLA 19 & 24 are included in the LVIA. Highland Council to advise on Special Landscape Areas.</p> <p>Viewpoints:- VP listed in Table 8.2 of the Scoping Report are accepted.</p> <p>Night-time visual:- impacts from turbine lighting must be assessed per aviation lighting guidance.Further advice from NatureScot following submission of lighting scheme and hub height details.</p>	
<p>Scoped out</p> <p>Assessment of the potential for changes to receptors where a material change is deemed unlikely</p>			

Hydrology & Hydrogeology			
Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scoped In Comparative assessment only to confirm no change.	SEPA	Agree to scoping out of aquifers, surface waters, water supplies and water dependant habitats such as GWDTEs.	No response required
	Scottish Water	It would be useful to know the estimated start date on site	No response required, but all points noted by SSER.
Scoped Out Potential effects on aquifers, surface waters, water dependant habitats, such as GWD supplies.		The fact that this area is located within a drinking water catchment should be noted in documentation Written permission must be obtained before any works are started within the area of our apparatus. For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.	
	THC	EIAR must evaluate impacts on: Watercourses, lochs, groundwater, water supplies Water quality and quantity Aquatic flora and fauna Erosion, sedimentation, and discoloration prevention measures needed. High rainfall events must be factored into runoff and flow calculations. Early consultation with SEPA on Controlled Activities	No response required – generic guidance for EIAR

Regulations (CAR) licensing advised.

THC – Environmental Health	Private Water Supplies	No response required
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The applicant has previously submitted a PWS risk assessment which demonstrated that there is a low to negligible risk of an adverse impact on these supplies which becomes negligible through the implementation of standard mitigation. No further information is required.

Geology & Soils

Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee/ EIA Scope
Scoped In	SEPA	Peat	Further peat depth surveying would be undertaken in areas of the Proposed Varied Development including micrositng. The peat survey data would be used to produce an updated Peat Management Plan would be undertaken to assess the potential impacts to soils and peat in accordance with NPF4 Policy 5 from the Proposed Varied Development. The PMP will include plans and details of the comparative changes between the Consented Development and the Proposed Varied Development and how minimisation of disturbance to soils and peat has been implemented within the design.
Updated Peat Management Plan		Agreed that Peat should be scope into EIA and scoping out of aquifers, surface waters, water supplies and water dependant habitats such as GWDTEs.	
Scoped Out			
Borrow Pit Assessment and Peat Slide Risk Assessment			
	THC	Full peat impact assessment required, including peat probing in all areas of proposed development, not just infrastructure points.	As above
		Micrositing areas should be probed as well.	
		EIAR should detail impacts on local geology, especially regarding: Borrow pits (location, size, depth, reinstatement profile); Earthworks and restoration; Use of	

recycled/secondary materials in construction

Scottish Ministers

PLHRA

Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

Borrow Pits

Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information

should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.

PMP

Scottish Ministers advise that a peat assessment is carried out for peatland and Carbon Rich Soils, Deep Peat, Priority Peatland Habitat (CPP)

PLHRA

The Proposed Varied Development has been designed to avoid areas of peat instability identified during the assessment of the Consented Development, however review of the requirement for any further PLHRA would be undertaken following the peat depth surveys.

Borrow Pits

The Proposed Varied Development will involve the removal of a Borrow Pit when compared to the Consented Development and no new Borrow Pit locations are proposed within the Proposed varied Development.

PMP

As per responses on Peat to THC and SEPA.

Noise			
Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scoped Out Scoped out as no nearby receptors, no change to construction or operational impacts and no significant impacts previously assessed.	THC – Environmental Health	<p>Despite the fact that SSER does not seek changes to previously conditioned noise limits, a new noise assessment is still required to confirm compliance.</p> <p>Assessment must follow ETSU-R-97 and the Institute of Acoustics Good Practice Guide.</p> <p>Must demonstrate compliance with limits set in 21/04080/S36.</p> <p>Cumulative Noise can be scoped out</p> <p>Amplitude Modulation, operational vibration, infrasound, and low frequency noise can also be scoped out from further assessment.</p> <p>Construction noise can be scoped out</p>	<p>No response required. However, a further noise assessment will be included with EIAR as per THC guidance.</p>

Traffic and Transport			
Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scope In Updated assessment of delivery route required due to size and no. of turbine component deliveries. Revised CTMP	Transport Scotland	<p>Agrees with SSER that given 50m increase, an updated assessment of the delivery route is required</p> <p>Request a screening assessment to prove that traffic volumes will remain as per the original EIAR.</p> <p>Requested updated base traffic data be utilised, as the original EIAR used 2018</p> <p>Transport Scotland states that an appropriate source of traffic</p>	<p>An updated Route Survey Report will be provided in support of the application along with a revised CTMP.</p> <p>A screening review will be undertaken with Transport Scotland to confirm the ability to scope transport out of the revised assessment.</p>
Scoped Out Further detailed assessment of traffic and transport			

data is Traffic Scotland's National Traffic Data System.

National Road Traffic Forecast (NRTF) Low Traffic Growth assumptions will require to be used to provide a common future year baseline to coincide with the expected construction traffic peak.

THC – Transport Planning

Impact of the application on the Road network

The CTMP will be updated

Heavier turbines may cause increased road damage, but the Roads Authority can rely on agreed mitigation measures, including the C.P.T.M.P., to ensure timely and effective repairs. The construction programme is expected to be extended, though no specific timeline has been provided

Scoping application Request and Summary

Considering the changes being proposed regarding this scoping application and considering the project which already has approval the Roads Authority believes it is acceptable to scope out Transportation & Traffic when reviewing this application as road mitigation measures are already in place to manage the road network within the consented application.

The L.R.A notes the developer will re submit the construction traffic management plan with any the future planning application

Scottish Ministers

States that Transport Scotland (TS) requests that a screening assessment is carried out in relation to the impact of increased traffic on the A887. TS also requests that updated base traffic data is utilised, as the original EIAR used 2018 Annual Average Daily Traffic Flows (AADT).

A screening assessment will be prepared and issued.

Socio-Economic, Tourism and Recreation			
Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIA Scope
<p>Scoped out</p> <p>Changes to the scheme will not result in any new adverse changes to previous impact assessment, therefore, Socio-Economic, Tourism and Recreation will be scoped out.</p> <p>A standalone Socio-Economic Statement will be submitted alongside the EIAR</p>	THC	<p>Impacts should be evaluated even if outside the Environmental Impact Assessment Report (EIAR).</p> <p>Identify individuals, households, local communities, tourists, tourism-related businesses, recreational groups, and economically active populations.</p> <p>Include job estimates and economic activity across all project phases—procurement, construction, operation, and decommissioning.</p> <p>Assess regional and local economic effects, not just national ones.</p> <p>THC's Access Officer agrees that recreation can be excluded from the assessment if it's only comparing the amended proposal to the already approved development. THC's Access Officer agrees that recreation can be excluded from the assessment if it's only comparing the amended proposal to the already approved development. However, if a new application is submitted, this would require a full assessment of public access impacts, including an outdoor access plan.</p>	<p>No response required.</p> <p>SSE Renewables is using the '<i>Maximising Net Socio-Economic Benefit of Renewable Energy</i>' Guidance and Report Framework created by Scottish Renewables and BiGGAR Economics in order to prepare its socio-economic statement. This guidance can be used to assess whether the Proposed Development is designed in such a way which will enable it to maximise net economic impact consistent with the goals set out in Scottish National Planning Framework 4, specifically Policy 11c.</p> <p>This will include a high- level assessment of the local, regional and national economy – which includes tourism – to understand opportunities to best maximise socio-economic benefit, looking at four core areas of impact aligned with the Scottish Onshore Sector Deal (skills development; local supply chain; community empowerment and environmental enhancement).</p> <p>If tourism is relevant within both of these contexts, it will be included and assessed within the overall report.</p>
	Scottish Ministers	<p>Considers that Socio-Economic, Tourism and Recreational impacts should be considered even if this is separate to the EIAR to ensure that these matters are appropriately addressed.</p> <p>The assessment should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio economic groupings such as tourists and tourist related</p>	<p>The relevant economic information in terms of job creation and economic impact will be assessed along the project lifecycle, apart from decommissioning. This is not currently foreseen but could potentially be included if required.</p>

businesses, recreational groups, economically active, etc.

The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the

impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.

Cairngorms National Park Association

No comments to make

Aviation & Radar

Proposed EIA Scope	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scoped In <ul style="list-style-type: none"> Revised radar, aviation safety and lighting assessment required due to increase in tip height and requirement for visible lighting scheme. 	Defence Infrastructure Organisation (MOD)	<p>Have concerns with the proposal as it falls within Low Flying Area 14 (LFA14). Turbines are a potential obstruction to low flying aircraft.</p> <p>A condition should be added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.</p> <p>Submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting. As a minimum the MOD would require that the cardinal turbines are fitted with infra-red (IR) lighting.</p>	<p>No Response Required. MoD will be consulted on WFLFAC's aviation lighting assessment report once finalised.</p>
	Scottish Ministers	<p>Scottish Ministers advise the applicant to engage with the MOD early to discuss and agree on mitigation strategies before submitting any formal application.</p>	<p>No Response Required. Response can be provided within the EIA chapter. MoD will be consulted on WFLFAC's aviation lighting assessment report which will cover all</p>

	Confirmation that the MOD requires: Submission of a detailed aviation safety lighting plan; approval of the plan by the MOD; implementation of MOD-accredited aviation safety lighting.	issues raised by Scottish Ministers.
	Night time visual Impact Assessment required to be included with LVIA	
Naturescot	Turbine lighting may cause adverse visual impacts; a night-time assessment must follow aviation lighting guidance.	No Response required
THC	<p>Community Assets Recognition</p> <p>The EIAR must identify and assess impacts on operational assets such as: TV and radio broadcast systems/ Telecommunication links / Aviation infrastructure including radar systems/ MOD safeguarding zones</p> <p>Consultation Requirements The applicant must:</p> <p>Engage with relevant authorities (e.g. Ofcom, NATS, BAA, CAA, MOD, HIAL)</p> <p>Provide written evidence of completed consultations and agreed outcomes.</p> <p>Include survey results in the EIAR to determine if suspensive conditions are needed</p> <p>Radar Impact Dialogue Ongoing consultation with Highlands and Islands Airports Ltd (HIAL) is required to assess potential radar interference at nearby airports.</p> <p>Communication Links Assessment Even if no effects are</p>	<p>This is a standard submission from THC (BAA (British Airports Authority) doesn't actually exist any more). Already planning to engage with CAA, MoD and HIAL. NATS haven't responded to scoping so will engage with them separately. No response to THC required at this time. Details of all engagement with aviation stakeholders will be included in the EIA.</p>

predicted, the EIAR must:

Explicitly explain the rationale behind that conclusion

Detail the methodology and evidence used to reach it

HIAL

Preliminary assessment shows that proposed development would not infringe the safeguarding criteria and operation of Inverness Airport.

No response required but would recommend engaging with HIAL to double-check there won't be an impact on radar.

Met Office

The proposal is outside any of our standard

20 km consultation zones and we would be able to manage any impacts on products and services derived from the weather radar data.

No concerns and don't need to be consulted further

No response required

Other Issues: Forestry, Telecoms, Shadow Flicker

Proposed EIA	Consultee	Scoping Consultee Comment	SSER Response to Consultee / EIAR Scope
Scoped In <ul style="list-style-type: none"> Operators of telecommunication networks will be consulted with final proposed turbine locations to confirm that no impacts on telecommunication pathways or fixed links are anticipated. 	JRC	Telecommunications:- Objection from the JRC on our Bhlairaidh WF extension project due to an SSE Distribution point to point radio link	This is being clarified by SSE who are in comms with JRC. Awaiting a response from JRC
Scoped Out <ul style="list-style-type: none"> Forestry and shadow flicker – previously scoped out of Consented Development EIA and no change expected as a result of Varied Development. 	THC (Forestry)	As it stands, a specific chapter on Forestry is required as the layout of the access road, turbines or associated infrastructure will impact on Forestry. The EIAR should provide a baseline survey of the plants (including fungi, lichens and bryophytes) and trees present on the site to determine the presence of any rare or threatened species.	This is currently being discussed/reviewed with Forestry Officer at THC. SSER have confirmed to THC any alterations to the layout of the access road, turbines or associated infrastructure as part of the Proposed Varied Development will have minimal impact on any areas of Forestry. Awaiting a response.

The EIAR should indicate areas of woodland / forestry plantation which may be felled to accommodate new development (including the access), including any off site works mitigation. Compensatory planting of new woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If trees are removed then compliance with the Scottish Government's Control of Woodland Removal Policy must be demonstrated. For any compensatory planting proposal, this is expected to replicate the functionality of the existing forestry to be removed (i.e. for commercial or habitat value).

4. Community Engagement

4.1. Community Council Engagement

- 4.1.1. **Table 4.1** summarises engagement with the relevant Community Councils to date. The Applicant intends to keep the community councils updated on the progress of the development application and to further discuss the Proposed Varied Development with them.

Table 4.1: Community Council Engagement Summary

Community Council	Engagement Summary		
	Type	Date	Reason
Fort Augustus & Glenmoriston Community Council	Email	30 April 2025	Notification of plans to submit Scoping submission, invite to meet if a discussion on plans would be useful (only Fort Augustus and Glenmoriston responded, agreed to attend c/c meeting on 25 th June)
Strathglass Community Council			
Glenurquart Community Council			
Local Councillors	Email	4 June 2025	Copy of scoping link shared, details of first public exhibition round shared, further offer to meet if useful to discuss further in advance of the public exhibition.
MP / MSP			
Public Exhibition (round 1)		24 June 2025	One C/C rep from Fort Augustus attended.
Fort Augustus and Glenmoriston Community Council	Meeting	25 June 2025	Attended C/C meeting to provide overview of variation proposal and provide opportunity to answer questions / discuss in more detail.

4.2. Public Consultation

- 4.2.1. In order to seek the views of the local community, the Applicant held the first public exhibition at Invermoriston Millennium Hall, Inverness on **Tuesday 24th June, 2pm-7pm**. A second exhibition is proposed following any further design refinement (design freeze) and prior to submission; this event is provisionally expected to take place in September 2025.
- 4.2.2. For the first public exhibitions, notification of the event was announced via:
- mail drop to 96 No. residences and businesses within a 5km radius;
 - emails to community councils, local authority councillors, local MP and MSP as well as some wider stakeholders who may potentially hold an interest (HIE, Highland Council officials) inviting them to publicise notices of the event on any community social media channels, local noticeboards or with any contacts who may be interested in attending;
 - advertisement placed in the local paper, The Inverness Courier for two consecutive weeks on Friday 6th June and Friday 13th June;
 - Update on the dedicated project website, including advanced advert notification of the event time and location and link to the exhibition board information and feedback form for any members of the public who were unable to attend on the day [Bhlairaidh Extension | SSE Renewables](#)

4.3. Pre-application Consultation (PAC) Report

- 4.3.1. Although there is no mandatory requirement under Section 36 of The Electricity Act 1989³ to provide a PAC report, the Applicant is committed to a comprehensive strategy of community engagement, and, in line with best practice, will provide a PAC report as supporting information with the application. The PAC report will provide information on all activities undertaken to engage with the local community prior to submission of the application and demonstrate where local views on the Proposed Varied Development have been considered.

5. Section 36C Application

5.1. Programme

- 5.1.1. The completed aspects of the pre-application process, along with the anticipated programme for the next steps ahead of application submission are presented in **Table 5.1**.

³ pre-application consultation (PAC) reports are only a mandatory requirement for 'Major' or 'National' projects, as set out in the Town & Country Planning (Development Management procedure) (Scotland) Regulations 2017

Table 5.1: Application Programme

Event	Expected Month/Year
Scoping Report Submission	13 th May 2025
1 st Public Exhibition	24 th June 2025
Submission of Gatecheck 1 report	September 2025
Completion of the EIA	October 2025
2 nd Public Exhibition	24 th September 2025
Receipt of Gatecheck 1 feedback and further consultation completed	
Gatecheck 2 process	November 2025
Submission of Application, EIAR and supporting documents to ECU & Advertisement of application	November 2025

5.2. Gatecheck 2

5.2.1. Gatecheck Stage 2 will be undertaken with the ECU **at least** 2 weeks prior to the intended submission date to confirm the administrative requirements of the application submission. This will include agreement on:

- Dealing with Notices / Advertisement wording and agreement on publications and duration of advert run;
 - Confirmation of no. and distribution of hard copies, CD copies or USB or other electronic format;
 - Agreement on location for public inspection of the hard copy of the S36C application and EIAR;
 - Uploading of documents to the ECU Portal, visibility on Local Authority Planning Portal and Project Website; and
- Payment of application fees to the ECU.

Figure 1.1 Site Location Plan

Figure 1.2 Site Layout Plan