

# **Bhlaraidh Wind Farm Extension Section 36C Variation**

## **Technical Appendix 3.2: Bhlaraidh Wind Farm Extension S36C Scoping Opinion**

Scottish Government - Energy Consents Unit - Application  
Details



Scottish Government  
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**The Scottish Government  
Energy Consents Unit**

**Scoping Opinion on behalf of Scottish Ministers under the Electricity  
Works (Environmental Impact Assessment) (Scotland) Regulations  
2017**

**Bhlaraidh Wind Farm Extension  
SSE Renewables Ltd**

**16<sup>th</sup> July 2025**

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## 1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to SSE Renewables Ltd a company incorporated under the Companies Acts with company number SC435847 and having its registered office at Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ (“the Company”) in response to a request dated 14<sup>th</sup> May 2025 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Bhlaraidh Wind Farm Extension (“the proposed development”). The request was accompanied by a scoping report.

1.2 The proposed development would be located at the Glenmoriston Estate, north-west of Invermoriston, Highlands.

1.3 The proposed development comprises a total of 15 turbines each with a maximum blade tip height of up to 230m. The proposed generating capacity is between 90MW to 108MW.

1.4 In addition to the turbines there will be ancillary infrastructure including:

- Crane hardstandings for each turbine
- Approximately 7.9km of new access tracks in addition to the existing 13.5km of access tracks
- An onsite substation
- Nine turning heads
- Up to 7 borrow pit search areas
- Two temporary construction compounds
- A single permanent LIDAR station
- A concrete batching plant
- 6 new access track water crossings
- Two routes of cross-country cabling approximately 700m and 1200m in length.

1.5 The Company indicates the proposed development would be decommissioned after 50 years and the site restored in accordance with the decommissioning and restoration plan.

1.6 The proposed varied development is solely within the planning authority of The Highland Council.

1.7 In August 2022, the Bhlaraidh Wind Farm Extension was granted consent by the Scottish Ministers. The Consented Development comprised of a total of 15 turbines with a blade tip height of up to 180m and had an expected installed capacity of 84 megawatts (MW).

The proposed varied development has a site boundary identical to that of the Consented Development. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the larger turbines.

The proposed varied development is immediately adjacent to the east, of SSE's Operational Bhlairaidh Wind Farm, which comprises 32 turbines with an installed capacity of 108 MW. There are no statutory designated nature conservation sites for ecological features within the Proposed Development boundary.

## 2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between SSE Renewables Ltd (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 29<sup>th</sup> May 2025. The consultation closed on 9<sup>th</sup> July 2025. Extensions to this deadline were granted to The Highland Council, Historic Environment Scotland, NatureScot, Defence Infrastructure Organisation and Joint Radio Company. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 36C of the Electricity Act 1989. All consultation responses received, and the standing advice from MD-SEDD, are attached in **ANNEX A Consultation responses** and **ANNEX B MD-SEDD Standing Advice**.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MD-SEDD, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 The following organisations were consulted but did not provide a response:

Civil Aviation Authority - Airspace

Crown Estate Scotland

District Salmon Fisheries Board - Beaully

District Salmon Fisheries Board – Ness

Fisheries Trust - Ness & Beaully Fisheries Trust

Fort Augustus & Glenmoriston Community Council

Friends of the Earth (Scotland)

Glenurquhart Community Council

Highland and Islands Enterprise

Inverness Chamber of Commerce

John Muir Trust

Mountaineering Scotland

NATS Safeguarding

RSPB Scotland

Scottish Canoe Association

Scottish Forestry

Scottish & Southern Electricity Networks (SSE)

ScotWays

Scottish Wildlife Trust

Scottish Wild Land Group

Strathglass Community Council

Visit Scotland

WWF (Scotland)

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 36C consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

### 3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with The Highland Council, within whose area the proposed development would be situated, NatureScot, Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 14<sup>th</sup> May 2025 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to The Highland Council for publication on their website. It has also been published on the Scottish Government energy consents website at [www.energyconsents.scot](http://www.energyconsents.scot).

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A and Annex B**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via [EIA@scottishwater.co.uk](mailto:EIA@scottishwater.co.uk)) and makes further enquires to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.8 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.



3.9 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for onshore wind farm and overhead line development <https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.10 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.11 MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.12 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. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.13 The scoping report identified viewpoints at Table 8.2 to be assessed within the landscape and visual impact assessment. The Highland Council (THC) requests that the EIAR's (Environmental Impact Assessment Report) photomontages follow the Council's Visualisation Standards.

THC's Historic Environment Team (Archaeology) are satisfied with the methodology provided in the Scoping Report, including the proposed figures and viewpoint locations. However, Scottish Minister's advice that finalised Viewpoints (VP) and wireframes for the EIAR must be agreed in advance of preparation of any visuals with THC and NatureScot (NS).

Historic Environment Scotland (HES) requests three scheduled monuments are included in the Zone of Theoretical Visibility (ZTV) of the EIAR due to the increase in turbine height. The three assets include Urquhart Castle, Levishie Cottage and Achratagan.

3.14 The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 11 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA “A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise”.

3.15 As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 8 of the scoping report 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.

NatureScot recommends that the night-time assessment is in line with their Guidance on Aviation Lighting Impact Assessment.

The Ministry of Defence (MOD) requests the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

3.16 It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot.

THC’s Ecology Officer has advised that the protected species surveys conducted in 2021 and 2022, are only valid for two years. Scottish Minister’s recognise the developer’s use of 2021 EIA data for the collision risk model (CRM) but caution that this information is only valid for five years. Due to the height increase of the turbines, NatureScot requests that revised collision risk calculations are used in the EIAR.

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.

3.17 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’**.

Scottish Ministers advise that a peat assessment is carried out for peatland and Carbon Rich Soils, Deep Peat, Priority Peatland Habitat (CPP) and include a Peat Landslide Hazard Risk Assessment (PHLRA) if appropriate.

3.18 Other issues for consideration would be the inclusion of a forestry chapter in the EIAR. Despite previous being scoped out of the Consented Development EIA, THC considers this as a necessary inclusion due to the potential impact the layout of the access road, turbines or associated infrastructure will have on forestry.

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).

The Joint Radio Company (JRC) will likely object to the proposed development based on its impacts to the exclusion zone of a Base Station site. The Scottish Ministers recommend that the applicant discuss and agree mitigation with the JRC prior to submission of any forthcoming application.

The Ministry of Defence will likely object to the proposed development based on the turbines potentially creating a physical obstruction to air traffic movements. The Scottish Ministers recommend that the applicant discuss and agree mitigation with the MOD prior to submission of any forthcoming application.

3.19 The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:-

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;
- underground cables;
- water pipes;
- telecommunications links.

3.20 Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.

3.21 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

#### 4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

#### 5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36C consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.7 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

**Niall MacQuarrie**  
**Energy Consents Unit**  
**16th July 2025**

## ANNEX A

### Consultation

#### List of consultees who provided a response.

• The Highland Council	A1-A30
• Historic Environment Scotland	A31-A36
• NatureScot	A37-A39
• Scottish Environmental Protection Agency	A40-A43
• British Horse Society	A44-A46
• British Telecommunications plc	A47
• Cairngorms National Park Association	A48
• The Coal Authority	A49
• Defence Infrastructure Organisation	A50-A52
• Fisheries Management Scotland	A53-A55
• Health and Safety Executive	A56
• Highlands and Islands Airports Limited	A57-A62
• Joint Radio Company Limited	A63-A70
• The MET Office	A71
• OFCOM	A72
• Office for Nuclear Regulation	A73-A75
• Scottish Gas Networks	A76-A77
• Scottish Water	A78-A81
• Transport Scotland	A82-A83

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland and Marine Directorate (in the form of standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) or bespoke advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD))

See Section 2.4 above for a list of organisations that were consulted but did not provide a response.

Energy Consents Unit  
Niall MacQuarrie  
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G2 8LU

Please ask for: Niamh Coyne  
Direct Dial:  
e-mail: [Niamh.Coyne1@Highland.gov.uk](mailto:Niamh.Coyne1@Highland.gov.uk)  
Our Ref: 25/00826/FUL  
Your Ref. ECU00006176  
Date: 02 July 2025

By email only to: [Niall.MacQuarrie@gov.scot](mailto:Niall.MacQuarrie@gov.scot);  
[Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Dear Niall,

**PLANNING REFERENCE: 25/02050/SCOP**  
**ECU REFERENCE: ECU00006176**

**ELECTRICITY ACT 1989**

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BHLARAI DH WIND FARM EXTENSION REDESIGN**

**LOCATION: GLENMORISTON ESTATE NORTH OF LEVISHIE, INVERMORISTON**

Thank you for requesting this Environmental Impact Assessment (EIA) Scoping Request for the above project. We received the consultation on 29<sup>th</sup> May 2025 by email, and we are grateful for the extension of time to make comments.

Unfortunately, Highland Council's Transport Planning Team have not responded due to current staffing resources and wider workload pressure. Their response will be forwarded separately once received so as not to delay Highland Council's response further.

Our view on the scope of the assessment may be subject to change on a number of topics within the EIAR if the scale of development, in terms of the number and height of turbines, changes.

Whilst unlikely, this application may reduce in scale to a level which would be considered as an application under the Town and Country Planning (Scotland) Act 1997 (As Amended). If this is the case, we would require a revised scoping response under the relevant regulations.

We trust that this consultation response helps inform the ECU Scoping Response and is helpful to the applicant when formalising any forthcoming application.

Yours sincerely

Niamh Coyne  
Planner  
The Highland Council

**SCOPING RESPONSE TO ENERGY CONSENTS UNIT**

<b>Applicant:</b>	<b>SSE Renewables Ltd</b>
<b>Project:</b>	<b>Bhlaraidh Wind Farm Extension Redesign - Erection and operation of a wind farm, comprising of up to 15 wind turbines with a maximum blade tip height of 230m, access tracks, borrow pits, substation, control building, and ancillary infrastructure.</b>
<b>Project Address:</b>	<b>Glenmoriston Estate, North of Levishe, Invermoriston</b>
<b>Our/ECU Reference</b>	<b>25/02050/SCOP / ECU00006176</b>

This response is given without prejudice to the Planning Authority's right to request information in connection with any statement, whether Environmental Impact Assessment Report (EIAR) or not, submitted in support of any future application. These views are also given without prejudice to the future consideration of and decision on any planning application received by The Highland Council (THC).

THC request that any EIAR submitted in support of an application for the above development take the comments highlighted below into account; many of which are already acknowledged within the Scoping Report. In particular, the elements of this report as highlighted in parts 3, 4 and 5 should be presented as three distinct elements.

Responses to the internal consultation undertaken are attached. Should any further responses be received from internal consultees, these will be forwarded in due course.

## **1.0 Description of the Development**

- 1.1 The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR must include:
- a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e., connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied;
  - a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;
  - the risk of accidents, having regard in particular to substances or technologies used;



- an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and
- the estimated cumulative impact of the project with other consented or operation development.

## 2.0 **Alternatives**

2.1 A statement is required which outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following:

- the design chapter should clearly set out the design evolution of the scheme including constraints to the delivery of that scheme;
- the range of technologies that may have been considered;
- locational criteria and economic parameters used in the initial site selection;
- options for access;
- design and locational options for all elements of the proposed development (including grid connection); and
- the environmental effects of the different options examined.

The assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.

## 3.0 **Environmental Elements Affected**

3.1 The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area and you are encouraged to use your understanding of these in assessing your development and the potential for cumulative effects to arise. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.

### **Land Use and Policy**

3.2 The current Development Plan comprises the:

- Fourth National Planning Framework (NPF4) adopted in 2023.
- Highland-wide Local Development Plan (HwLDP) adopted 2012.
- Inner Moray Firth Local Development Plan 2 (IMFLDP2) adopted 2024.
- Associated Supplementary Guidance (SG), with particular regard to the Onshore Wind Energy Supplementary Guidance (OWESG) (2016) and Part 2b (2017).

A large number of policies will apply to this proposal from the above development plan documents. This response does not attempt to detail all which may be relevant, as such, it is recommended that the applicant/agent reviews all these plans and documents prior to submission to establish the planning policy context for the EIA. The scope of the EIA should, however, address all the relevant issues covered within NPF4, HwLDP, IMFLDP2, and Highland Council Supplementary Guidance. The IMFLDP2 will have limited relevance to this proposal as its focus is mainly on regional and settlement strategies as well as identifying specific site allocations. However, certain aspects of the strategies for the local area and settlements may help to inform plans for community engagement. IMFLDP2 does, however, establish boundaries (including any refinements) of the Special Landscape Areas (SLAs) across the plan area. The SLA citations webpage summarise key characteristics, qualities, sensitivities, and measures for enhancement and must be used to assess the potential impacts of the proposed development.

- 3.3 The Council has recently commenced the preparation of a new-style Highland Local Development Plan (HLDP), with the intention to undertake the evidence-gathering stage of the new LDP throughout 2023, with the tentative programme including an Evidence Report in 2024 and subsequent Gate Check, with Proposed Plan stage in 2025. Once adopted this new style HLDP will supersede and replace HwLDP and the Council 'area' LDP. The programme of work includes the review of the coverage and content of its current suite of Supplementary Guidance, to establish which aspects should be covered within the new Local Development Plan itself, which aspects should be covered within non-statutory planning guidance and any aspects no longer required. Applicants are advised to monitor the Council's annual Development Plans Newsletter, as this provides the most up to date timetable for this work and is available on the Council Development Plans webpage.
- 3.4 The Onshore Wind Energy Supplementary Guidance, on pages 19 and 20, lists ten landscape and visual criteria that the Council use as a framework for assessing proposals. In considering landscape and visual impacts, the assessment should pay particular attention to these 10 criteria, as these will be used in the future appraisal of an application and should therefore also form part of the applicant's own assessment.
- 3.5 The Council also recognises the importance of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, as the legislative tool for addressing Scotland's Climate & Ecological Emergency, which the Council committed to under its own Climate and Ecological Emergency declaration in May 2019. In addition, the Scottish Government published its Onshore Wind: Policy Statement 2022 on 21st December 2022. This statement sets out the Government ambition to deploy a minimum of 20GW of onshore wind by 2030, up from the 9.4GW of existing generation capacity in June 2023.
- 3.6 Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in Scottish Government Policy documents, with the aforementioned Policy Statement reinforcing the notion that the right development should be permitted in the right place.

- 3.7 Developer Contributions, Community Benefit & Community Wealth Building will all need to be considered as the scheme develops. With Developer Contribution sought towards Transport (including Active Travel), Green Infrastructure, Water & Waste and Public Art/Realm in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018).
- 3.8 Your attention is also drawn to the fact that the council has a separate remit to promote community benefit which is distinct and separate from planning. The policy contains contacts for further discussion on this matter and we would encourage the developer to engage early in the process. The Council's position with regard community benefits has recently been updated with the approval of a new 'Social Values Charter for Renewables Investment' at its meeting on 27 June 2024, with the report available at the following link:  
[https://www.highland.gov.uk/meetings/meeting/5003/highland\\_council](https://www.highland.gov.uk/meetings/meeting/5003/highland_council)
- 3.9 The approved charter sets out The Highland Council's expectations from developers wishing to invest in renewables in the Highland area and what the Highland partnership – public, private, and community – will do to support and enable this contribution, namely:
- embed an approach to community wealth building into Highland;
  - maximise economic benefits from our natural environment and resources;
  - engage and involve relevant stakeholders to understand how we can continually improve our impact; and,
  - unlock economic opportunities for the area.
- 3.10 Community Wealth Building is intended to encourage, promote, and facilitate a new strategic approach to economic development as set out in NPF4 Policy 25. This Policy indicates examples of what contributions by development proposals to community wealth building could include: improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets. However, that is not an exhaustive list.
- 3.11 Notwithstanding that wind energy developments contribute to the production and supply of renewable energy, the Council maintains that this commitment must be taken in balance along with all other considerations, and that such developments should be located, sited, and designed appropriately and thus assessed against the wider development plan policies.

### **Sustainability**

- 3.12 The Council's Sustainable Design Guide SG provides advice and guidance on a range of sustainability topics, including design, building materials, and minimising environmental impacts of development. A Sustainable Design Statement is required. Wind farms produce

a sustainable form of energy; however, the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development in its entirety is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of sustainable development are fully assessed in the information which supports the application. The wind farm needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer needs to consider the impact of the installation and the prospective long-term use of the energy to accommodate the requirements of a decarbonised energy provision for Scotland and the Highlands. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies.

- 3.13 It would be highly beneficial to have information to explain electricity network benefits and capacity proposed, with the end result ideally being all wind turbines being operational on a consistent basis when there is sufficient windspeeds, rather than either certain or no turbines being in operational depending upon short term grid constraints or levels of demand.
- 3.14 To that end, concepts of developing energy storage and/or Major Energy Users (such as Hydrogen production) in association with Energy Generation are of interest to the Council, with considerable potential benefits for energy generation (avoiding or reducing curtailment), diversity, decarbonisation, efficiency and supply and for the economy. It may be noted that the Council supports in broad principle the inclusion of energy storage within such developments and that in respect of hydrogen the Council has (March 2021) agreed to prepare a Hydrogen Strategy for Highland. A strategy for the provision of charging points within the development should also be submitted with the application.

### **Landscape and Visual**

- 3.15 The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape; i.e., a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards and are subject an independent verification check upon receipt:

[https://www.highland.gov.uk/downloads/file/12880/visualisation\\_standards\\_for\\_wind\\_energy\\_developments](https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments)

- 3.16 Separate volumes of visualisations should be prepared to both Highland Council Standards and NatureScot guidance. These should be provided in hard copy. It would be beneficial for THC's volume to be provided in a **A3 leaver arch folder** for ease of use. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in the view. We are happy to provide advice on this matter going forward. All existing turbines should be re-rendered even if they appear to be facing the viewer in the photograph to ensure consistency.
- 3.17 All elements of a development are important to consider within any EIAR and the assessment must include the expected landscape and visual impact of any on-site BESS, borrow pits, access roads, compounds including substations, this is despite the fact that the principal structures will be a primary concern. All elements of the proposal are to be rendered into photomontages.
- 3.18 There are a number of similar applications in this area that are yet to be determined / concluded in the vicinity of this application, many of these have been identified in the scoping report, which may or may not help clarify the weight towards particular policy elements in the final planning balance. Our interactive Wind Turbine map is up to date as of 01 January 2024 and can be accessed on the following link: <http://highland.gov.uk/windmap> . The Energy Consents Unit may also be able to provide details of any other known nearby proposal that may be at Scoping Stage as these may have advanced at the same pace as your proposal.
- 3.19 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.
- 3.20 We acknowledge that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. We have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography.
- 3.21 As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy schemes within the area. The detailed location of viewpoints will be informed by site survey, mapping and predicted ZTVs. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community, and associated reporting on consultation undertaken, take this into account.
- 3.22 The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or

sequential assessment, or to show a representative view, or for assessment of impact on designated sites, communities, or individual properties. However, it is important for assessors to remember that Visual Effects are defined by GLVIA3 not just as effects on views, but as 'Effects on specific views and on the general amenity experienced by people'.

- 3.23 The Study Area will be 45km, given the scale of the turbines. Given the size of the turbines and the landscape sensitivities of this site and the surrounding area, we would expect a detailed assessment of effects should be undertaken for the whole Study Area, including for Cumulative Impact Assessment, which should also include an assessment of sequential effects as the receptor moves through the landscape.
- 3.24 Furthermore, the LVIA Chapter of the EIAR should clearly set out the methodology including:
- Definitions of each point on the scale of magnitude of change which is used by the applicant in reaching a conclusion on the magnitude of change;
  - Definitions of each point on the scale of sensitivity of receptor which is used by the applicant in reaching a conclusion on the sensitivity of receptor;
  - The threshold to which the applicant considers a significant effect is reached. For the avoidance of doubt the Council consider that Moderate impacts can be significant, and it is recommended that the EIAR takes this approach as well;
  - A clear matrix approach supported by descriptive text setting out how you have reached your conclusion of effect on landscape character, designated landscapes, visual receptors, and residential amenity. The LVIA should contain be an assessment of significance of singular and cumulative effects for each of the viewpoints following this methodology in addition to receptor groups. This approach is important because the logic of the applicant's assessment must be clearly and readily understood.
- 3.25 Given the potential cumulative impact of renewable energy in this area it is expected that the applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there may be an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined schemes in the Council's Panoramic Viewer please see the link below:
- <http://www.highland.gov.uk/panoramicviewer>
- 3.26 We expect the Landscape Impact Assessment to refer to the Council's Onshore Wind Energy Supplementary Guidance and expect an assessment of the proposal against the criterion set out in the Council's OWESG at pages 19 and 20 to be included within the LVIA chapter of the EIAR. The Proposed Development is situated within Landscape Character Type 222 (LCT222): Rocky Moorland Plateau – Inverness, as shown in Figure 8.3 of the Scoping Report. Rocky Moorland Plateau is described in the NatureScot 2019 national LCT map to consist of two areas of high rocky plateau which covers much of the central part of



the district, gradually merging to the Rugged Massif – Inverness in the west and bordering the Great Glen to the east. The plateau forms a simple moorland backdrop to the adjacent lower straths and glens.

- 3.27 The finalised LVIA should include consideration of the impact of the proposals on the visual amenity of key transport routes in the area. When assessing the impact on recreational routes please ensure that all core paths and long-distance trails, are assessed. The assessments of these routes should include a sequential assessment of how the development will be experienced in relation to existing and consented wind farms. We expect an assessment of the development's visual impacts on surrounding settlements.
- 3.28 We advise that wind energy developments are generally sited within a complex combination of Landscape Character Types. As such, the Landscape Impact Assessment's analysis should not only focus on potential impacts on individual Landscape Character Types and individual Units, but also on the local landscape character composition within which these elements come together to define a particular sense of place.
- 3.29 An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. While NatureScot will respond separately to the ECU on landscape and other matters, their draft guidance on assessing the impacts on Special Landscape Qualities of National Scenic Areas should be followed with NatureScot determining which qualities should be scoped in for detailed assessment once the full list of VPs is finalised.
- 3.30 In addition, any assessments of Special Landscape Areas (SLA) must be undertaken using the SLA citations available from the Council's website.
- 3.31 As the heights of the proposed turbines are above 150m, aviation lighting is required. Further advice on aviation lighting is available from NatureScot however generally the impact of aviation lighting on WLAs and SLAs and areas where there would be an expectation of dark skies should be included. THC generally prefers the term 'Hours of Darkness' over 'Night-Time' in recognition of how extensive hours of darkness can be in the Highlands. It is pertinent to the assessment to understand that Hours of Darkness Effects will be visible during people's working day and commuting hours for a significant part of the year and that sensitivities of receptors to these effects must account for this. Therefore, Hours of Darkness VPs should be representative of commutes and communities, as well as Wild Land.
- 3.32 The residential visual amenity impact should be assessed for all properties, settlements, housing groups within 2km of the turbines within the LVIA.

### **Cultural Heritage**

- 3.33 The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify:

- the architectural heritage (Conservation Areas, Listed Buildings);
- the archaeological heritage (Scheduled Monuments);
- the landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development; and
- the inter-relationship between the above factors.

3.34 We would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. Where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings should be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.

3.35 Historic Environment Scotland (HES) are anticipated to provide comment on the assessment methodology for heritage assets within their remit including the scope of the assessment and their requirements for supporting information (including visualisations) and the potential impacts on heritage assets in their consultation response.

3.36 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.

### **Geology, Hydrology and Hydrogeology (Water Environment)**

3.37 The EIAR should include a full assessment on the impact of the development on peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micro-siting limits.

3.38 SEPA can provide detailed advice on methodology for peat probing and the peat assessment.

3.39 Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.

3.40 The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are



proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.

- 3.41 The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult SEPA as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.
- 3.42 If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.
- 3.43 The Council's Flood Risk Management Team has reviewed the scoping information and has no comment to make on the proposals at the scoping stage. However, there are a number of watercourses and waterbodies on the site therefore the following applies:
- A minimum of a 50m buffer of all watercourses / bodies and turbines/crane hard-standings, which should be shown on a suitably scaled drawing;
  - All tracks should be kept a minimum 10m away from any waterbody except water crossings;
  - Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible;
  - Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses;

- Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change;
- Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and,
- The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment SG.

3.44 The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.

3.45 The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. The report should include details of any monitoring prior to, during and following construction. If appropriate, it should also include proposals for contingency measures in the event of an incident. Highland Council has some information on known supplies, but it is not definitive. An on-site survey will be required.

3.46 It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.

## Ecology

3.47 The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc.) interest on site. It needs to be categorically established what species are present on the site, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programmes (such as native- tree planting, stock exclusion, etc.) for the proposed site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.

## Ecology General Guidance

3.48 The developer should undertake a specific peat assessment to inform the siting, design, or other mitigation in order to overcome significant effects on peatland and Carbon Rich Soils, Deep Peat, and Priority Peatland Habitat (CPP). Attention is drawn to paragraph 4.34 on page 24 of the OWESG, which discusses peat and CPP. We also expect an up-to-date

National vegetation Classification (NVC) survey and a commitment to undertake peatland restoration on an area of increased size to that of the application site. The Environmental Impact Assessment Report (EIAR) should provide details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site.

- 3.49 The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. NatureScot can also provide specific advice in respect of the designated site boundaries for SACs and SPAs and on protected species and habitats within those sites. The potential impact of the development proposals on other designated areas such as SSSI's should be carefully and thoroughly considered and, where possible, appropriate mitigation measures outlined in the EIAR. NatureScot provide advice on the impact on designated sites.
- 3.50 If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests.
- 3.51 The EIAR needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.
- 3.52 Further advice can be found in NatureScot's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken. NatureScot will comment on good quality priority peatland and protected areas, including the Flow Country World Heritage Site. SEPA will lead on deep peat and GWDTEs.
- 3.53 The EIAR should include a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers, these habitats are easily damaged by insensitive drainage.
- 3.54 NPF4's commitment to deliver positive effects for biodiversity through development. Policy 3 states that, 'Development proposals for national, major and of EIA development should only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management.' A draft or outline Habitat Management Plan (HMP) and Species Protection Plan (SPP) should be produced as part of the EIA, including any proposals for mitigation and enhancement in relation to important habitats and species. Any compensatory planting plans should be carefully considered and included in the HMP. The HMP should include a comprehensive monitoring programme for all habitat improvements, and breeding birds on the site. Remote sensing using radar or infra-red cameras should be considered, to help

inform future development and decision making within the industry with regards to eagles. Lastly, the HMP (or other document) should also include a protocol for reporting collisions to NatureScot.

3.55 The Council's Ecology Officer welcome the inclusion of a detailed scoping report with considerations regarding ecology and provided the following responses to the questions within the submitted Scoping Report.

3.56 1. Are Consultees content with the proposed baseline?

The protected species surveys were conducted to inform the EIAs in 2021 and 2022, in addition to preconstruction checks in 2023. Per NatureScot's Planning and development: standing advice and guidance documents, such surveys remain valid for two years. Should baseline data exceed this period, protected species surveys (including bats) must be repeated.

3.57 While the habitat assessment proposes using 2019 phase 1 and NVC data, 2023 habitat surveys are also available. Updated habitat data must inform impact assessments, as habitat conditions change over time. This is also critical for biodiversity enhancement and peatland restoration baselines.

3.58 2. Are Consultees content with the effects that are proposed to be scoped out of the assessment?

Protected species are proposed for scoping out, on the basis that no significant change on impacts. Should updated protected species establish a new baseline, scoping decisions must be reassessed. If existing data remains valid in accordance with NatureScot's professional guidance, scoping out is acceptable. The Ecology Officer agrees with scoping in habitat impacts, as land-take alterations necessitate a reassessment.

3.59 3. Are Consultees content with the proposed approach to the evaluation and impact assessment methods?

If there is a new baseline for protected species, then impacts must be reassessed, and the EIA should proposed revised mitigation and Species Protection Plans (SPPs). Absent of new data, the Ecology Officer concurs with the proposed approach and with the existing SPPs.

3.60 For habitat, assessments must address all habitats (not solely peatlands). The applicant should follow NatureScot's guidance "Advising on peatland, carbon-rich soils and priority peatland habitats in development management". The peatland assessment should include direct/indirect impacts and permanent/temporary impacts, using a 30m buffer from infrastructure for drainage effects. The EIA should include a habitat-specific area loss breakdown. The impacts to peatland offset using the 1:10 loss/restored peatland restoration areas should be clearly identified and mapped.

- 3.61 4. Can Consultees provide details of any recent records or projects within or in the vicinity of the site, which may not yet be in the public domain, and which may be pertinent to the assessment of impacts relating to the proposed varied development?

The Ecology Officer advised that they have no additional records to provide.

#### Biodiversity Enhancement

- 3.62 The Council's Ecology Officer advises that as this is a major development, NPF4 Policy 3b is applicable and requires biodiversity enhancement of the site post-construction in addition to mitigation in addition to mitigation and compensation measures.
- 3.63 In order to satisfy Policy 3b, the Highland Council's Biodiversity Enhancement Planning Guidance must be followed. It is recommended that the inclusion of a detailed metric assessment, such as the Defra's Statutory Metric (provided as a separated and readable document) to support this. All sites marked for enhancement should also be clearly identified and mapped in the EIA.
- 3.64 The scoping report refers that a Habitat Management Plan (HMP) 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.
- 3.65 NatureScot's Developing with Nature guidance has been prepared, in discussion with Scottish Government, to support major development applications. It sets out a number of common measures to enhance biodiversity. For national, major and EIA developments, more detailed assessment and more ambitious measures are likely to be required. The applicant should explore and identify opportunities for biodiversity enhancement as early as possible, including through discussion with key stakeholders. Within the EIA report, information on predicted losses, proposed compensation and delivery of additional positive effects should be clearly summarised. The information must be sufficient to allow the consenting authority and relevant stakeholders to see clearly how effects will be addressed, and compensation and enhancement delivered. Developers may wish to consider the simple template at Annex C of the Developing with Nature guidance.

<https://www.nature.scot/doc/developing-nature-guidance#annex-c>

#### **Ornithology**

- 3.66 The presence of Schedule 1 Birds and qualifying interests of Special Protection Areas and other areas designated for aviary interests must be included and considered as part of the planning application process; not as an issue that can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to any comments from NatureScot and RSPB in this respect.
- 3.67 An assessment of the impacts to birds through collision, disturbance, and displacement from foraging / breeding / roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.
- 3.68 The Council's Ecology Officer welcome the inclusion of a detailed scoping report with considerations regarding ornithology and provided the following responses to the questions within the submitted Scoping Report.
- 3.69 1. Are Consultees content with the proposed baseline?
- The applicant proposed using flight activity gathered between October 2018 and August 2020 as baseline data to inform the collision risk modelling (CRM). Per NatureScot's guidance – Recommended bird survey methods to inform impact assessment of onshore windfarms, data exceeding five years is invalid. Updated vantage point surveys are required to confirm current flight activity (two full years, unless shorter periods are justified).
- 3.70 It is not clear in the scoping report when the other ornithological surveys (moorland breeding birds, breeding raptors, divers, and back grouse lek surveys) have been conducted. Therefore, we are unable to comment on the proposed baseline. Data more than five years old must be repeated as per NatureScot's guidance.
- 3.71 2. Are Consultees content with the effects that are proposed to be scoped out of the assessment?
- Disturbance, displacement and habitat loss effects are proposed for scoping out, citing previously approved mitigation (Breeding Bird Protection Plan). We agree with this if the baseline data remains valid (less than 5 years old). With a new baseline, the scoping must be reconsidered.
- 3.72 3. Are Consultees content with the proposed approach to the evaluation and impact assessment methods?
- We agree to updated collision risk model using the Band model (per 2021 EIA), subject to a review of any potential updates to collision avoidance rates.
- 3.73 The impacts from disturbance, displacement and habitat loss effects must be considered in the EIA, should new baseline data scope in receptors.
- 3.74 4. Can Consultees provide details of any recent records or projects within or in the vicinity of the site, which may not yet be in the public domain, and which may be



pertinent to the assessment of impacts relating to the proposed varied development?

The updated collision risk modelling must review cumulative impacts from new/approved proposals within the same Natural Heritage Zone.

## **Noise**

- 3.75 THC's Environmental Health team has not responded on the consultation request but may provide comments at a later stage. The following standing advice should therefore be adhered to.

### Operational Noise

- 3.76 The applicant must submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics.
- 3.77 The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development.

### Cumulative Noise

- 3.78 The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted and consented levels from such developments. The good practice guide offers guidance on how to deal with cumulative issues. Where existing development has consented limits higher than suggested above, the applicant should agree appropriate limits with the Council's Environmental Health Officer.
- 3.79 The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed. The assessment should also include a table of figures which includes the following:
- The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s.

- The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear.
- The predicted levels from each existing or consented wind farm development at each NSL.
- The cumulative levels based on consented and predicted levels at each NSL.

The assessment should also include a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

#### Noise Exposure

- 3.80 When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite.

#### Background Noise Measurements

- 3.81 If background noise surveys are required, these should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer. Where a monitoring locations is to be used as a proxy location for another property, particular care must be taken to ensure it is not affected by other noise sources such as boiler flues, wind chimes, etc. which are not present at that other property.
- 3.82 Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys.
- 3.83 It is recommended that the developer's noise consultant liaises with Environmental Health at an early stage to discuss any issues regarding the proposed methodology.

#### Amplitude Modulation

- 3.84 Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

#### Construction Noise



- 3.85 Given the location, construction noise at the turbines sites is unlikely to be an issue at any noise sensitive properties, however, consideration will need to be given to construction traffic.
- 3.86 Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. Generally, people are tolerant of construction noise during typical working hours which are taken to be 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be carried out out-with these times.
- 3.87 If the applicant intends to undertake noisy work out-with the aforementioned times, they will be required to submit a detailed construction noise assessment for the written approval of the Planning Authority. The assessment should include:
1. A description of construction activities with reference to noise generating plant and equipment.
  2. A detailed plan showing the location of noise sources, noise sensitive premises and any survey measurement locations.
  3. A description of any noise mitigation methods that will be employed and the predicted effect of said methods on noise levels.
  4. A prediction of noise levels resultant at the curtilage of noise sensitive receptors.
  5. An assessment of the predicted noise levels in comparison with relevant standards.
- 3.88 Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented. Particular attention should be given to the use of tonal reversing alarms and ground compaction plant which are often the most intrusive noise generating elements of a large construction project.

### **Substations and Battery Energy Storage Systems**

- 3.89 If the application includes a proposal for a sub-station or battery storage site, a separate noise assessment may be required to demonstrate that noise will meet the following standards:
- Noise arising from within the operational land of the sub-station, when measured and/or calculated as an LZeq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at noise sensitive premises
  - The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated within the operational land of the sub-station, must not exceed the current background noise levels at noise sensitive premises. The Rating Level should be calculated in accordance with BS 4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound.

## Traffic and Transport

- 3.90 THC's Transport Planning has not responded on the consultation request but may provide comments at a later stage.
- 3.91 A Transport Assessment (TA), Construction Traffic Management Plan (CTMP) and an Abnormal Load Assessment will be required within the EIAR. The Transport Assessment Methodology below sets out what the Council requires and further information is provided in our published Roads and Transport Guidelines for New Developments. When establishing a scope for the assessment consideration should be given to the use of the public roads in this area can be influenced significantly by tourist traffic.

### Transport Assessment Methodology

- 3.92 Transport Planning would expect a Transport Assessment to be submitted with any future planning application and a High National Traffic Forecast be applied. The information below is not exhaustive and should be used as a guide to submitting all relevant information in relation to roads, traffic and transportation matters arising from the development proposals:
1. Identify all public roads affected by the development. In addition to transportation of all abnormal loads and vehicles (delivery of components) this should also include routes to be used by local suppliers and staff. It is expected that the developer submits a preferred access route for the development. All other access route options should be provided, having been investigated in order to establish their feasibility. This should clearly identify the pros and cons of all the route options and therefore provide a logical selection process to arrive at a preferred route.
  2. Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:
    - Assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts, including non-destructive testing and sampling as required;
    - Road surface condition and profile;
    - Assessment of structures and any weight restrictions;
    - Road widths, vertical and horizontal alignment and provision of passing places; and
    - Details of adjacent communities.
  3. Determine the traffic generation and distribution of the proposals throughout the construction and operation periods to provide accurate data resulting from the proposed development including:
    - nos. of light and heavy vehicles including staff travel;

- abnormal loads; and
  - duration of works.
4. Current traffic flows including use by public transport services, school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.
  5. Impacts of proposed traffic including:
    - impacts on carriageway, structures, verges etc.;
    - impacts on other road users;
    - impacts on adjacent communities;
    - swept path and gradient analysis where it is envisaged that transportation of traffic could be problematic; and
    - provision of Trial Runs to be carried out in order to prove the route is achievable and/or to establish the extent of works required to facilitate transportation.
  6. Cumulative impacts with other developments in progress and committed developments including other Renewable Energy projects.
  7. Proposed mitigation measures to address impacts identified in 5 above, including:
    - carriageway strengthening;
    - strengthening of bridges and culverts;
    - carriageway widening and/or edge strengthening;
    - provision of passing places;
    - road safety measures; and
    - traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.
  8. Details of residual effects.

#### Abnormal Load Assessment

- 3.93 The TA should include an Abnormal Load Assessment of the roads utilised to convey abnormal loads to the site. The assessment will need to confirm the proposed port of entry for AIL components and justify the adequacy of the route for transporting them to the site. Early discussion with the Council's abnormal loads team (the contact is [abnormal.loads@highland.gov.uk](mailto:abnormal.loads@highland.gov.uk)) and the Council's structures team (the contact is [structures@highland.gov.uk](mailto:structures@highland.gov.uk)) is recommended.

#### Construction Traffic Management Plan

- 3.94 THC Transport Planning will require any application for planning permission associated with this proposal to submit a CTMP for the approval of the Planning Authority. A CTMP

will normally detail the following issues, however this is not an exhaustive list and the CTMP should be tailored to reflect the issues pertinent to this development:

- Identification of all Council maintained roads likely to be affected by the various stages of the development,
- Predicted volume, type and duration of construction traffic.
- Location of site compound, staff parking and visitor parking.
- Proposed measures to mitigate the impact of general construction traffic and abnormal loads on the local road network following detailed assessment of relevant roads.
- Details of any traffic management signage required for the duration of the construction period.
- Measures to ensure that all affected public roads are kept free of mud and debris arising from the development.
- The developer may also be requested to enter into a Section 96 agreement with the Highland Council to cover any abnormal wear and tear to the Council roads. This will include a requirement for pre and post construction surveys to be undertaken and agreed with the Council and for the provision of a suitable bond.
- If the development involves any abnormal loads a detailed protocol, route and delivery programme will be required and agreed with any interested parties such as Highland Council, the Police, Transport Scotland, and community representatives. The protocol shall identify any requirement for convoy working and/or escorting of vehicles and include arrangements to provide advance notice of abnormal load movements in the local media.

#### Detailed Junction Design

- 3.95 Details of any new site access should be clearly set out on dimensioned drawings related to OS data and include confirmation of geometry, construction form, drainage details to prevent water running out onto the public road and evidence that appropriate visibility splays can be achieved. Vehicle swept paths should also be provided to evidence that the proposed junction form will be suitable for its intended use. Details of reinstatement of any temporary site access at its junction with the public road, post construction is also required. Appropriate junction arrangements and visibility splay information can be found in THC's published Roads and Transport Guidelines for New Developments.

#### **Socio-Economic, Tourism and Recreation**

- 3.96 We consider 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. 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

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.

### Public Access

- 3.97 When assessing the impact on recreational routes please ensure that all core paths, rights of way, national cycle network, and long distance trails are assessed. Other useful information about patterns of recreational use on site include Strava's Global Heatmap and Ramblers Scotland Paths Map. These should help form a more adequate baseline of information for a comprehensive assessment of the proposal's impact on public access during the construction and operation phases of any development.
- 3.98 The potential impact on and mitigation for public access should be assessed incorporating core paths, public rights of way, long distance routes, other paths and wider access rights across the site. While the Scoping Report and an eventual EIA may include impacts on elements of outdoor access assessed under other headings, THC's Access Officer considers that all the impacts on outdoor access should all be brought together here in a comprehensive assessment of the proposals visual and physical impacts on outdoor access during the preparatory, construction, operational and post-operational phases. Guidance on assessing that impact as part of an EIA in Appendix 6 of this document:  
<https://www.nature.scot/sites/default/files/2018-05/Publication%202018%20-%20Environmental%20Impact%20Assessment%20Handbook%20V5.pdf>
- 3.99 Those impacts, along with the mitigation measures, will inform an Access Management Plan which is required to be submitted as part of the EIAR and an assessment of the development's impact on public access included within this Socio Economic section of the EIAR as per the requirements of HwLDP Policy 77 Outdoor Access.
- 3.100 As a point to note, any retained or planned gates should have a pass gate installed by them to accommodate walkers, cyclists and horse riders with an internal width of at least 1.5m – kissing gates are unacceptable.
- 3.101 THC's Access Officer has responded confirming they are content that recreation has been scoped out if the question the assessment relates to any potential changes to the impact on recreation between this amended proposal and the consented development. However, they note that if this is to be the subject of a new application then they would maintain the need for an assessment on the impacts of this proposal on public access supported by the submission of an outdoor access plan.

### **Aviation, Radar and Telecoms**

- 3.102 The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained within the EIAR to determine whether any suspensive conditions are required in relation to such issues.
- 3.103 There should be continued dialogue with HIAL over the impact on the radar at airports in the area.
- 3.104 If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.

#### **Miscellaneous: Health and Safety and Shadow Flicker**

- 3.105 The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the site.
- 3.106 Depending on the proximity of the working area and access route to any houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements and routing.
- 3.107 A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application.

#### **Forestry**

- 3.108 The Highland Council's Forestry Officer has responded stating the Scoping Report section 3.3. (Varied Development Proposed EIA Scope) Table 2 notes that Forestry was previously scoped out of Consented Development EIA and no change expected as a result of Varied Development. IN addition, section 5.4.1. notes that Habitats that occur in the field study area that are unlikely to be impacted due to their distance from the development area include coniferous woodland plantation, mixed woodland plantation, dry heath, marshy

grassland and bare/disturbed ground. It would appear that no areas of woodland would be affected by the proposals and Forestry could be scoped out.

- 3.109 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. 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).

#### **4.0 Significant Effects on the Environment**

- 4.1 Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:
- the existence of the development;
  - the use of natural resources; and
  - the emission of pollutants, the creation of nuisances and the elimination of waste.
- 4.2 The potential significant effects of development must have regard to:
- the extent of the impact (geographical area and size of the affected population);
  - the trans-frontier nature of the impact;
  - the magnitude and complexity of the impact;
  - the probability of the impact; and
  - the duration, frequency and reversibility of the impact.
- 4.3 The effects of development upon baseline data should be provided in clear summary points.
- 4.4 The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.
- 4.5 The applicant should provide a description of the forecasting methods used to assess the effects on the environment.



## 5.0 **Mitigation**

- 5.1 Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reducing and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.
- 5.2 The mitigation being tabled in respect of a single development proposal can be manifold. Consequently the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). Further guidance can be obtained at:  
[http://www.highland.gov.uk/NR/rdonlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction\\_environmental\\_management\\_22122010.pdf](http://www.highland.gov.uk/NR/rdonlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction_environmental_management_22122010.pdf)  
This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.
- 5.3 The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.

If you would like to discuss this scoping response, please contact the undersigned.

Niamh Coyne  
Planner



## EIA Scoping Opinion Consultation Request Notification

Development Plans Team

Planning Authority Name	<b>THE HIGHLAND COUNCIL</b>
Response Date	<b>30th June 2025</b>
Planning Authority Reference	<b>25/02050/SCOP</b>
Major Application?	
Ward	<b>12</b>
Nature of Proposal (Description)	<b>Bhlaraidh Wind Farm Extension Redesign - Erection and operation of a wind farm, comprising of up to 15 wind turbines with a maximum blade tip height of 230m, access tracks, borrow pits, substation, control building, and ancillary infrastructure. This case will be determined by the Energy Consents Unit. Please visit Energy Consents Unit at <a href="https://www.energyconsents.scot/ApplicationSearch.aspx?T=2">https://www.energyconsents.scot/ApplicationSearch.aspx?T=2</a> using reference number ECU00006176</b>
Site	<b>Glenmoriston Estate North Of Levishie Invermoriston</b>
Site Postcode	<b>N/A</b>
Site Gazetteer UPRN	<b>000130165628</b>
Proposal Location Easting	<b>237639</b>
Proposal Location Northing	<b>820074</b>
Area of application site (m2)	
Clarification of Specific Reasons for Consultation	
Development Hierarchy Level	
Supporting Documentation URL	<b>Copy and paste 25/02050/SCOP into the following <a href="#">LINK</a></b> <b>Please note you will only be able to view Local/Major Pre-applications if you have been given Consultee Access. Please contact <a href="mailto:HQ.PlanningTechnicians@highland.gov.uk">HQ.PlanningTechnicians@highland.gov.uk</a> to be set up for Consultee Access.</b>
List of Available Supporting Documentation	
Offline Documents available?	
Date of Validation by Planning Authority	<b>29th May 2025</b>
Date of Consultation	<b>9th June 2025</b>

Governing Legislation	<b>TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017</b>
Consultation Type	<b>Scoping Applications</b>
Consultation Stage	<b>N/A</b>
Is this a re-consultation of an existing application?	<b>No</b>
EIA Required	<b>No</b>
EIA Regulations	<b>N/A</b>
Use Class (Current)	<b>OTH</b>
Use Class (Proposed)	<b>CU13-Onshore Wind Production</b>
Distance from Trunk Road Centre Line	
New/Amended Vehicle Access to/from Public Road	
Does the application conform with the Structure Plan / Local Plan Land Use	
Additional Comments relating to Structure Plan / Local Plan Use	<b>N/A</b>
Transport Assessment or Travel Plan	<b>N/A</b>
Applicant Name	<b>SSE Renewables Ltd</b>
Applicant Organisation Name	
Applicant Address	<b>Per: Mandy Roddie Inveralmond House 200 Dunkeld Road Perth PH1 3AQ</b>
Agent Name	
Agent Organisation Name	
Agent Address	
Agent Phone Number	<b>N/A</b>
Agent Email Address	<b>N/A</b>
Planning Area Office	
Case Officer	<b>Niamh Coyne</b>
Case Officer Phone number	
Return email address	<b>epc@highland.gov.uk</b>

NOTES:





By email to: [consents\\_admin@gov.scot](mailto:consents_admin@gov.scot)

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

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131 668 8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300037514  
Your ref: ECU00006176  
26 June 2025

Dear Scottish Government Energy Consents

## The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Bhlaraidh Wind Farm Extension, Glenmoriston Estate, North Of Levishe,  
Invermoriston

### Comments on scope of proposed Environmental Impact Assessment

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 29 May 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by our advice giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

### Proposed development

We understand that proposed development comprises 15 turbines each with a maximum blade tip height of up to 230m, plus associated infrastructure at a site to the northwest of Invermoriston on the western side of Loch Ness. We also note that some of the infrastructure works are already in place as they formed part of a consented scheme which is being superseded by this application.

### Scope of assessment

We have identified likely significant effects on our historic environment interests. Our advice on the nature of these impacts and any potential mitigation measures are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

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



## Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series. In this case the advice provided in the [Setting](#) guidance note appears to be the most relevant.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, [hmconsultations@hes.scot](mailto:hmconsultations@hes.scot). If you have questions about this response, please contact Deirdre Cameron at [deirdre.cameron@hes.scot](mailto:deirdre.cameron@hes.scot)

Yours sincerely

**Historic Environment Scotland**



## ANNEX: Our Detailed Comments

### Background

We understand that proposed development comprises 15 turbines with a maximum blade tip height of up to 230m, plus associated infrastructure at a site to the northwest of Invermoriston on the western side of Loch Ness. The proposed development represents a variation to a consented scheme (referred to as the Consented Development in the scoping report). The new application is required because the tip height of the turbines has increased; the conclusions of the previous EIAR are therefore no longer valid. We note that some of the infrastructure works for the Consented Development have already been undertaken.

### Our interest

As noted above, the scoping report provides a ZTV map showing the area around the development where turbines would be visible. We have used this map to assess the proposals for our interests and have identified three assets for our consideration in this consultation.

#### [Urquhart Castle](#) (SM90309)

Urquhart Castle was identified for detailed assessment in the original EIA Report and the information provided in the scoping report indicates it will have intervisibility with the turbine array and that the turbines will be visible in views towards the castle from the opposite bank of Loch Ness and from the loch itself.

This scheduled monument comprises the remains of a complex medieval castle of multiple phases, situated on a promontory on the shore of Loch Ness. The north end of the castle is marked by a 16th-century tower which, although lacking much of its south side still rises to its full height. Other buildings in the castle are not as well preserved as this. They include the great hall and kitchens, a chapel, gatehouse, smithy, dovecot and other buildings of unidentified purpose. The history of the castle spans back to the 13th century, when the earliest stone castle was built, although excavation at the south end of the castle has shown the presence of a defensive structure dating from the first millennium AD. The landward side of the castle is protected by a ditch that was formerly crossed by a drawbridge. At the north end of this ditch is a large kiln. The presence of the kiln next to a large, open, gently sloping area suggests that there was a small settlement beyond the walls and ditch of the castle, and this was confirmed during excavations associated with the construction of the visitor centre in 2000. The castle was garrisoned during the Jacobite rising of 1689 during which time a number of the buildings were severely damaged. There has been little investigation into the extent and location of damage, or whether there were subsequent repairs. The castle came into state care in 1912.

The setting of the castle on the shores of Loch Ness is truly majestic. Located on a promontory of the shore of the loch, its position is defensive and visually impressive. It has oversight of all movement along this part of Loch Ness, and as such its successive owners, keepers, and constables have played an important role in the administration of the

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Highlands, and the complex and long-lived occupation tells us much about the development of lordship, building styles, and royal control in the Highlands. It is one of the most photographed 'picturesque' castles in Scotland, and as such it holds a high place in the public consciousness. Views towards Urquhart Castle from the surrounding area are an integral element of its setting and cultural significance.

#### [Levishie Cottage, fort and earthwork 1050m NE of](#) (SM4567)

Like Urquhart Castle, Levishie Cottage, fort and earthwork will retain intervisibility with the amended turbine array.

This scheduled monument is located on south-facing slopes on the northern side of Strath Moriston, about 1.5km south of the development site. It comprises a bivallate fort of Iron Age date defended on its north and west sides by two ditches with a central rampart and on its other sides by steep natural slopes, with an apparent reinforcement of an adjacent linear earthwork where it runs near the fort on its uphill side.

The fort is likely to have been carefully sited in a defensible location within a landscape over which it exerted control, so a key element of its setting are views towards it made when moving through the strath. Whilst topography may mean that turbines would be unlikely to dominate outward views from the fort, it is possible that both the fort and turbines would be present in the same view at various points whilst moving through the strath and there would be the potential for an impact on its setting.

#### [Achratagan, hut circle and cairnfield 790m NNE of](#) (SM11456)

Achratagan hut circle and cairnfield was not within the ZTV for the original scheme but the increase in turbine height means that the array will now be visible from this asset.

The monument comprises a hut circle and associated field system, between 4000 and 1500 years old, situated on the edge of a terrace on a hillside moor. The hut circle is oval in plan, The ground surface of the lower part of the slope has been built up to provide a level interior for the structure. There are numerous contemporary clearance cairns, measuring up to 6m in diameter, covering the rest of the terrace, and on the slope below the hut circle. A relatively recent shooting butt is also located on the terrace amidst the cairns.

The monument sits in a local bowl in an upland landscape on a south-facing slope over a burn, and is likely to have been designed with local views to and from the monument from adjacent hillsides and on approach to the monument up the course of the burn from the south-west.

## Scoping Report

The scoping report provides sufficient information to understand the location and nature of the project. We note and welcome the proposal to scope cultural heritage impacts into the assessment. We can confirm we are content with the proposed EIA Report and Chapter structures.



The information relating to the assessment process is lacking in detail with no clear description of how the significance of impacts and effects will be assessed. Section 7.4 of the scoping report states that the forthcoming assessment will use the same methodology as that previously employed for the consented development. Whilst we were content with that methodology in the EIAR, it has not been set out in the scoping report. Without sight of what is proposed we cannot confirm if it would be appropriate in this case. We recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts.

Cultural heritage is considered in Section 7 of the scoping report. We note that although the information for the previous EIAR for the consented Blaraidh Wind Farm will be used as the initial basis for the assessment, the scoping report specifically acknowledges that the proposed design changes mean that the assessment process will be repeated.

To ensure that all relevant assets can be identified and assessed, we recommend that Zone of Theoretical Visibility (ZTV) mapping is used to identify assets that could experience setting impacts from the amended wind farm design. We welcome the acknowledgement within the scoping report that due to the proposed increase in turbine height for this wind farm, there will be additional assessment of impact based on the updated ZTV mapping. A ZTV map is provided in the scoping report showing both the original and current areas from which turbines would be visible; this is a particularly useful feature which has helped in our consideration of this consultation.

In addition to views from the assets themselves towards the development, the initial assessment should also consider the role that views towards cultural heritage assets can play in their setting and cultural importance; this may be relevant to assets that fall outside the ZTV.

We are content to use wireframe visualisations to understand impacts on the settings of Urquhart Castle (SM90309) and Levishie Cottage, fort and earthwork 1050m NE of (SM4567). These should be produced from the positions assessed in the original EIAR (namely CH VP1 for Levishie Cottage and CH VP2 for Urquhart Castle). We also request that a comparative wireline should be produced for each asset showing the consented scheme and the proposed scheme.

Achratagan hut circle and cairnfield 790m NNE of (SM11456) was not assessed in the original EIAR; the increase in turbine height means that it is now intervisible with the array. We have considered this monument and note that it has a localised setting and is located around 12km from the proposed development. As such, we do not believe that a significant impact upon this monument is likely to occur, and we are content for it to be scoped out of further assessment.





## Our position

The proposed development has the potential to result in significant adverse effects on a scheduled monument. These effects should be assessed in the EIAR and any significant impacts and effects identified should be mitigated or avoided through careful design.

Historic Environment Scotland  
June 2025



Niall MacQuarrie  
Case Officer  
Energy Consents Unit  
Scottish Government  
*By email: [niall.macquarrie@gov.scot](mailto:niall.macquarrie@gov.scot)*

07 July 2025

Our ref: CEA180416/101862  
Your ref: ECU00006176

Dear Niall

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS  
2017  
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION FOR BHLARAI DH  
WIND FARM EXTENSION**

Thank you for your consultation on the above proposal dated 29 May 2025 and for allowing us extra time to respond. The proposed variation is for an increase in the maximum blade tip height from 180m metres to 230m with repositioning of some turbines, tracks and crane hardstandings.

We are broadly content that the information included within the scoping report is sufficient to inform the Environmental Impact Assessment (EIA) Report.

**Background**

The Bhlaraiddh Wind Farm Extension was granted consent by the Scottish Ministers in August 2022. We provided a response for the section 36 application for the Bhlaraiddh Wind Farm Extension, which comprised of 18 turbines up to 180m high blade tip with no visible aviation lighting, on 10 November 2021. We also provided a response in relation to the additional information for the reduced, and consented, 15 turbine layout on 13 May 2022.

## Appraisal

### Ornithology

We agree that due to the increase in turbine dimensions, collision risk modelling is scoped in for red throated diver, Slavonian grebe, black grouse, golden eagle, greenshank and golden plover. Revised collision risk calculations should be presented in the EIA report and, where appropriate, in combination with other wind farm developments.

Please note we have updated our Collision Risk Modelling Guidance:

<https://www.nature.scot/doc/guidance-using-updated-collision-risk-model-assess-bird-collision-risk-onshore-wind-farms>.

### Landscape and visual

We agree that Glen Affric National Scenic Area (NSA), Wild Land Area (WLA) 19: Braeroy – Glenshirra – Creah Meagaidh and WLA 24: Central Highlands are scoped into the landscape and visual impact assessment (LVIA). The Highland Council will lead on provision of advice on the Special Landscape Areas. We agree with the list of proposed viewpoints to be used in the LVIA as listed in Table 8.2 of the Scoping Report.

The potential requirement for turbine lighting may result in significant adverse effects on both landscape character and visual receptors. We recommend the night-time assessment is in line with the jointly drafted Guidance on Aviation Lighting Impact Assessment:

<https://www.nature.scot/doc/guidance-aviation-lighting-impact-assessment>. Once a lighting scheme is agreed and hub height and preliminary visible aviation lighting Zone of Theoretical Visibility are available, we can provide further advice on the proposed night-time viewpoints. We note that potential mitigation measures relating to visible aviation lighting will be explored in consultation with the Civil Aviation Authority.

### Protected species

The increase in blade tip height by 50m may require reassessment of buffer distances to key bat habitats. Please see our guidance on Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation: <https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation>

### Priority peatland habitat

We welcome that an assessment will be undertaken of the effects of potential changes to land take on sensitive peatland habitats and updated habitat calculations for the proposed varied development vs the consented development will be included.

We note that all mitigation measures and subsequent documents to satisfy pre-commencement planning conditions relation habitats will also be reviewed.

### Protected areas

We agree impacts on the River Moriston Special Area of Conservation and Levishie Wood Site of Special Scientific Interest are scoped out of the EIA report if the mitigation proposed and agreed remains.

## **Conclusion**

The scoping report includes questions which we have sought to cover within our response. If the applicant requires any further clarification, they are welcome to contact us directly.

Please note that while we are supportive of the principle of renewable energy, this advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

Please do not hesitate to contact me should you have any queries on our advice above. This advice is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours sincerely,

Sophia Irvine  
Renewable Energy Casework Adviser  
[sophia.irvine@nature.scot](mailto:sophia.irvine@nature.scot)



Niall Macquarrie  
ECU

Our Ref: PCS-20005690  
Your Ref: ECU00006176

By email only to: Econsents\_Admin@gov.scot

SEPA Email Contact:  
planning.north@sepa.org.uk

30 May 2025

Dear Niall Macquarrie

**Electricity Act 1989 - Section 36**

**ECU00006176**

**Bhlaraidh wind farm extension - variation to previously consented development**

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development.

Our position and advice, given below, is based on Scottish Ministers ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under policies 5 (soils) and 22 (flood risk and water management), as defined in National Planning Framework 4 (NPF4). If this is not the case, please advise so we can re-consider our position and advice. We consider that this also covers the requirements in NPF4 Policies 2 Climate mitigation and adaption, 3 Biodiversity and 11 Energy.

**Advice for the determining authority**

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities overlain with proposed permanent and temporary



**Chair**  
Lisa Tennant

**CEO**  
Nicole Paterson

**SEPA**  
Unit 6  
4 Parklands Avenue  
Holytown  
Motherwell  
ML1 4WQ

Tel: 03000 99 66 99  
www.sepa.org.uk

development as requested in paragraphs 1.4 and 1.5 below. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment.

## **1. Scoping advice**

- 1.1 We understand that the current request for a scoping opinion is for a proposed variation to the previously consented Bhlairaidh wind farm development. The development site boundary of the consented development and the varied development are identical, however there are some adjustments to turbine locations and associated realignment of tracks and hardstandings. Our scoping advice is provided on this basis.
- 1.2 With reference to our response to the application for the now consented development (letter to ECU dated 28 September 2021) and subsequent discharge of conditions, we note that section 3.2.4 of the Scoping report identifies that the applicant expects that the mitigation measures included as part of the consented development will remain largely the same. And that section 10.3.1 of the Scoping report states that “The Applicant would request similar conditions to those attached to the S36 to be applied to any new S36C consent.”. It is therefore likely that mitigation measures and plans previously agreed by SEPA would be included as part of the proposed development, should it be consented as requested by the applicant.
- 1.3 Subject to that being the case, we have the following advice for the matters within SEPA’s remit in relation to the questions set out in section 1.3.1 of the Scoping report:
  - We are content with the proposed baseline and approach to evaluation and assessment methods.
  - Highland Council are best placed to advise on any projects within or in the vicinity of the proposed development site that may not yet be in the public domain.

- We agree with scoping **out** of potential effects on aquifers, surface waters, water supplies and water dependant habitats such as GWDTEs.
- We agree with the scoping **in** of effects on peat for the reasons set out in Table 2: Proposed EIA structure and S36C Scoping Justification in the section on Chapter 10 Geology and Soils, and as described in paragraphs 10.3.1 and 10.3.2 of the Scoping report.

- 1.4 We request that figures accompanying the future application are of an adequate scale with which to assess the information. In particular, comparison figures of sufficient scale must be provided to demonstrate how the proposed development compares to the consented development in relation to the location of all infrastructure, peat depth and habitat condition. To show sufficient detail of smaller areas of the site, this could mean that, as well as an overall whole site figure, multiple figures may be required splitting the site into sections using larger scale maps. Such figures should show greater detail of where different elements of the proposed development are located in relation to those interests, to demonstrate how the two layouts compare and how additional adverse effects have been minimised in the new layout.
- 1.5 We request that the above figures detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements.
- 1.6 In relation to the design of watercourse crossings, we highlight that crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. It would be helpful for the Environmental Impact Assessment Report to confirm that this would be the case. (Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.)

- 1.7 The Schedule of Mitigation of the EIA Report should include a commitment that any micro-siting would not encroach into buffers for private water supplies or watercourses, or result in a greater overall effect on peat than the original location.
- 1.8 If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

If you have queries relating to this letter, please contact us at [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk) including our reference number in the email subject.

Your sincerely  
Nina Caudrey  
Senior Planning Officer  
Planning Service

Ecopsy to: [Niall.Macquarrie@gov.scot](mailto:Niall.Macquarrie@gov.scot)

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found at [sepa.org.uk/environment/land/planning/](https://sepa.org.uk/environment/land/planning/).



Patron His Majesty The King

The British Horse Society

Email [catriona.davies@bhs.org.uk](mailto:catriona.davies@bhs.org.uk)

Scotland

Website [www.bhs.org.uk](http://www.bhs.org.uk)

Suite A3

Tel 02476 840749

Stirling Agricultural Centre

Mob 07757 258712

Bringing horses and people together

Stirling FK9 4RN

By email to: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)5<sup>th</sup> June 2025

Dear Sir/Madam,

**Re: Request for scoping opinion for proposed Bhlaraidh Wind Farm ECU00006176**

Thank you for the opportunity to respond to this request for scoping opinion. The British Horse Society (The BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles and is the largest and most influential equestrian charity in the UK. The BHS is committed to protecting and promoting the interests of all horses and the people who care for them through our work in education, welfare, safety and access.

**Outdoor Access**

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing wind farm proposals. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.

Although there are no designated Core Paths within the site it is likely the public use the existing wind farm access tracks for recreation. Consideration should therefore be given to how access for all users, including equestrians, will be managed both during the construction phase and when the wind farm is operational.

There is significant untapped potential for wind farm developments of all sizes to improve access provision via their networks of tracks, especially if consideration is given to laying out tracks to provide circular loops. To achieve this outcome, when completed, the tracks should be suitable for all users. Unconsolidated sharp stone is likely to injure horses so tracks should be finished with a layer of consolidated whin dust. Obstructions to access like locked gates or deer grids with no side gate should be avoided. Access to paths and tracks is especially valuable in areas where extensive peat bog makes it difficult or unsafe for access takers, especially those with horses, to make their own way across open ground.

The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.

**The Importance of Off-Road Riding**

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences.

Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and semi-rural areas, like the Highlands. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) but they often have few other places to ride or no other way to access their safe off-road riding.

Vehicles travelling to and from Bhlaraidh are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our *"Guidance to drivers of large vehicles"* document.

**The Horse and the Rural Economy**

Scotland's equestrian industry is worth over £300 million to the Scottish economy annually. This figure excludes the value of the horse racing industry, which is worth a further £300 million. Equestrianism is an important part of the rural economy in rural and semi-rural areas like the Highlands. Recent joint research between SRUC and The BHS showed current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society, leading to growth in the sector.

A national survey of riders who had recently given up their horse found that 27% of them had done so because they had lost access and had nowhere to ride. Failing to accommodate horses on our local path networks may lead to riders being forced to give up their horses, which in turn may damage the local economy.

I trust that the above information is of assistance. If you have any questions or would like to discuss the needs of equestrians further, please do contact me.

Kind regards,

REDACT

Catriona Davies  
Scotland Access Officer  
The British Horse Society

## Guidance for Drivers of Large Vehicles

Horses are naturally nervous of large vehicles, especially if they do not often meet them. If they are very frightened, they can run away in panic. Whilst their rider or carriage driver will do all they can to prevent this, should it happen, it could cause a serious accident for the horse and rider or carriage driver and for other road users.

The main factors which cause fear in horses are:

- Being approached by a large, moving object, which may be unfamiliar or intimidating to them,
- Lack of space between themselves and the vehicle,
- The noise of the vehicle, especially air brakes,
- Picking up on the anxiety of their rider or carriage driver.

Horses have keen eyesight and due to the position of their eyes on the sides of their head, can detect vehicles approaching from behind as well as ahead. They also have very sensitive hearing and will detect an approaching vehicle, and begin to react, before their rider or carriage driver.

### How can you help?

When you meet a horse on the road:

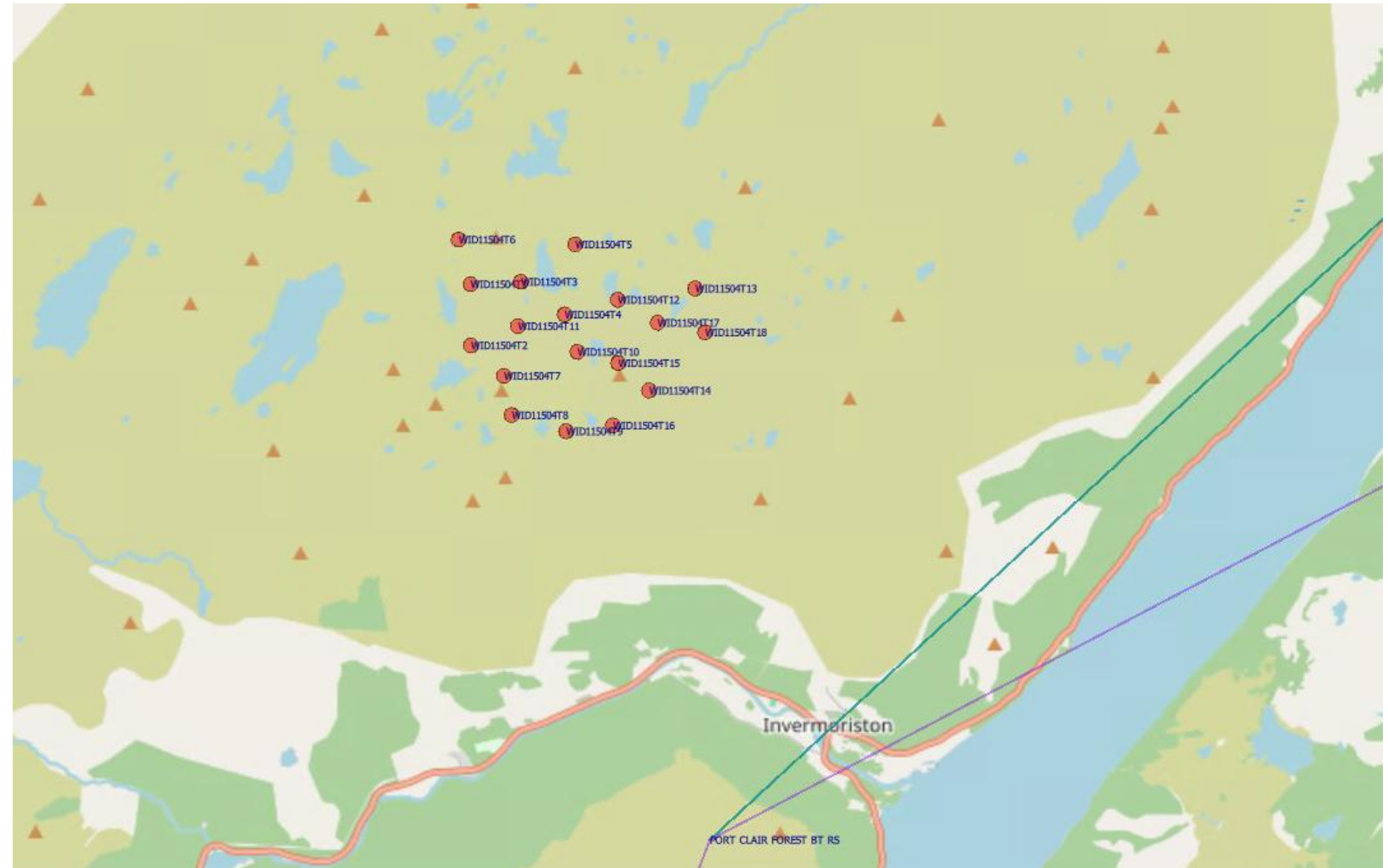
- Slow down to 10mph or less and be prepared to stop if necessary.
- Be aware that the sound of your air brakes may spook a horse.
- If a horse shows signs of nervousness as you approach, stop, turn off your engine and allow them to move away. Don't move off again until they are well clear of your vehicle.
- Pass wide and slow, when it is safe to do so – allow at least 2m between your vehicle and the horse, and drive away slowly.
- If you are approaching a horse on a narrow road and wish to pass or overtake, slow down and give the rider or carriage driver time to find a gateway, layby or other refuge to create sufficient space between the horse and your vehicle.
- Please be patient. Most riders and carriage drivers will do their best to make way as quickly and safely as they can.
- The safest place for a rider or carriage driver's hands is on the reins, so they may only be able to nod their thanks to you, but please be assured, they will be very grateful for your consideration.

**Thank you for helping to keep horses, and the people who care for them, safe.**

OUR REF:- WID13863

A47

We have studied the proposed windfarm development with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.



**From:** [Emma Bryce](#)  
**To:** [Niall Macquarrie](#)  
**Cc:** [Planning](#)  
**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension - ECU00006176 (CNPA ref. PRE/2025/0008)  
**Date:** 09 June 2025 11:05:21  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Good morning Niall,

Thank you for notifying CNPA on the application for Bhlaraidh Windfarm extension. I would confirm that given the distance from the National Park boundary and that this development is unlikely to have any impact on the Special Landscape Qualities and landscape character of the National Park, CNPA have no comments to make on this submission.

Kind regards

**Emma Bryce** (she/her)  
Planning Manager (Development Management)

T: 01479 870 564

E: [emmabryce@cairngorms.co.uk](mailto:emmabryce@cairngorms.co.uk)

Usual working hours: Monday to Thursday



**Cairngorms National Park Authority /  
Ùghdarras Pàirc Nàiseanta a' Mhonaidh Ruaidh**  
14 The Square | Grantown on Spey | PH26 3HG  
+44 (0) 1479 873 535 | [cairngorms.co.uk](http://cairngorms.co.uk)

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Read our plan for the future: [cairngorms.co.uk/PartnershipPlan](http://cairngorms.co.uk/PartnershipPlan)



The Coal  
Authority

**A49**

200 Lichfield Lane  
Mansfield  
Nottinghamshire  
NG18 4RG

**T:** 01623 637 119 (Planning Enquiries)

**E:** [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

**W:** [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

**For the attention of: Niall MacQuarrie**

Energy Development

[By email: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)]

29 May 2025

Dear Niall MacQuarrie

**Re: ECU00006176 Bhlaraidh Wind Farm Extension**

**Request for scoping opinion for proposed section 36c application for Bhlaraidh Wind Farm Extension; Located In The Planning Authority Area Of, The Highland Council**

Thank you for your notification of 29 May 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

The site to which this submission relates is not located within the defined coalfield. On this basis we have no specific comment to make.

Yours

**The Coal Authority Planning Team**



Defence  
Infrastructure  
Organisation

Andy White  
Ministry of Defence  
Safeguarding Department  
DIO Head Office  
St George's House  
DMS Whittington  
Lichfield  
Staffordshire WS14 9PY

Your reference: ECU00006176

E-mail: [DIO-safeguarding-wind@mod.gov.uk](mailto:DIO-safeguarding-wind@mod.gov.uk)

Our reference: DIO10046103

[www.mod.uk/DIO](http://www.mod.uk/DIO)

Niall MacQuarrie  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

12 June 2025

**By email only**

Dear Niall,

**Electricity Act 1989  
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017**

**Request for Scoping Opinion for Proposed Section 36C Application for Bhlaraidh Wind Farm Extension**

**The current request for a Scoping Opinion is for a proposed variation to the Consented Development.**

Thank you for consulting the Ministry of Defence (MOD) in relation to the scoping request through your communication dated 29 May 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that the MOD has concerns with the proposal.

The proposal concerns a development of 15 turbines each with a maximum blade tip height of up to 230 metres above ground level. The development site boundary of the consented development and the varied development are identical. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the larger turbines. The proposed development has been assessed using the location data (Grid



References) below provided in the email from Niall MacQuarrie to DIO in response to a request for proposed turbine locations, dated 4 June 2025 and 'Bhlairaidh Wind Farm Extension, Figure 1: S36C Scoping Report Proposed Varied Development Layout, Document Number LN000127-BHLX-SID-SK-0006-10', dated 2 May 2025.

Turbine no.	Easting	Northing
1	238401	821692
2	238367	820992
3	238945	821833
4	239499	821334
5	239556	821949
6	238277	822170
7	238746	820686
8	238776	820250

Turbine no.	Easting	Northing
9	239315	820040
10	239569	820831
11	238945	821306
12	240026	821464
15	240119	820823
16	239848	820102
17	240450	821190

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.

### **Physical Obstruction**

In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above terrain features to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD would require conditions were 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.

The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any Civil Aviation Authority requirements, the MOD would require the 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.

### **Summary**

The MOD has concerns with this proposal due to the potential impact to low flying aircraft operating in the development area.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above/in the developer's Email from Niall MacQuarrie to DIO in response to a request for proposed turbine locations, dated 4 June 2025, 'Bhlairaidh Extension Varied Development, S36C Scoping Report', dated 13 May 2025 and 'Bhlairaidh Wind Farm Extension, Figure 1: S36C Scoping Report Proposed Varied Development Layout, Document Number LN000127-BHLX-SID-SK-0006-10', dated 2 May 2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.



I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

**MOD:** <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours faithfully,

REDACT

Andy White  
Assistant Safeguarding Manager

**From:** [Brian Davidson](#)  
**To:** [Niall Macquarrie](#)  
**Cc:** [Chris Conroy \(ceo@ndsfb.org\)](mailto:ceo@ndsfb.org)  
**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension  
**Date:** 05 June 2025 14:13:21  
**Attachments:** [image001.png](#)

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Dear Niall,

Thank you for your correspondence concerning Bhlaraidh Wind Farm Extension.

Fisheries Management Scotland (FMS) represents the network of Scottish District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries and the network of fishery trusts who provide a research, educational and monitoring role for all freshwater fish.

FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal. The proposed development falls within the catchment relating to the Ness DSFB. It is important that the proposals are conducted in full consultation with the board and I should be grateful if they could be involved in the project proposals. I have also copied this response to Brian Shaw at the Ness DSFB.

Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.

- [LINK TO ADVICE ON TERRESTRIAL WINDFARMS](#)
- [LINK TO DSFB & TRUST CONTACT DETAILS](#)

Kind regards,

Brian

**Brian Davidson | Director of Operations**

Fisheries Management Scotland  
11 Rutland Square, Edinburgh, EH1 2AS  
Tel: 0131 221 6567 | 075844 84602  
[www.fms.scot](http://www.fms.scot)

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**From:** Niall.Macquarrie@gov.scot <Niall.Macquarrie@gov.scot>  
**Sent:** 29 May 2025 09:58  
**Subject:** Request for Scoping Opinion Bhlaraidh Wind Farm Extension

Dear Consultee,

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION  
FOR Bhlaraidh Wind Farm Extension**

On **14<sup>th</sup> May 2025**, **SSE Renewables Ltd** (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section **36C** application for the **Bhlaraidh Wind Farm Extension**.

In August 2022, the Bhlaraidh Wind Farm Extension was granted consent by the Scottish Ministers. The Consented Development comprised of a total of 15 turbines with a blade tip height of up to 180m. It had an expected installed capacity of 84 megawatts (MW) and was to be situated on Glenmoriston Estate, north-west of Invermoriston in the Great Glen.

The current request for a Scoping Opinion is for a proposed variation to the Consented Development. The Development Site boundary of the Consented Development and the Varied Development are identical. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the larger turbines. The proposed development consists of 15 turbines each with a maximum blade tip height of up to 230m. The proposed generating capacity is between 90MW to 108MW.

The proposed development is located in the planning authority area of **The Highland Council**, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Bhlaraidh Wind Farm Extension** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006176** and then click on **Documents** tab.

The indicative wind turbine OS grid co-ordinates, are found on Figure 1: S36C Scoping Report Proposed Varied Development Layout. The rotor diameter will be between 150m to 163m. The hub height will be between 148.5m to 155m.

**To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further**

**matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.**

I would be grateful for your comments by **19<sup>th</sup> June 2025**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Regards

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



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**From:** [LUP enquiries](#)  
**To:** [Niall Macquarrie](#)  
**Subject:** Fw: Request for Scoping Opinion Bhlaraidh Wind Farm Extension  
**Date:** 05 June 2025 10:26:56  
**Attachments:** [image001.png](#)  
[Outlook-Health and.png](#)

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Dear Mr MacQuarrie,

Thank you for your consultation of 29 May 2025 from the Scottish Ministers (sent to HSE's email address HazSubConsent.CEMHD5@hse.gov.uk), for HSE's view on the proposed Bhlaraidh Wind Farm Extension for consent under section 36 of the Electricity Act 1989.

**Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017**

- HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.
- HSE is not responding in our regulatory role in the health and safety system

1. The proposed development, is not a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.

2. The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.

3. The development is not located within HSE's land-use-planning consultation zones for major accident hazard pipelines and hazardous substances consented sites (licensed explosives sites are covered in the previous paragraph).

**Due to the above 3 points, HSE have no views on the additional information provided.**

4. If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please directly consult the operator of the establishment, as appropriate.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

Kind regards,  
Kathryn Deakin

**Katie Butchart**

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**From:** Safeguarding <Safeguarding@hial.co.uk>  
**Sent:** 07 July 2025 15:53  
**To:** Niall Macquarrie  
**Cc:** Safeguarding  
**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension

OFFICIAL

Hi Niall,

Thank you for the requested information, I appreciate it. Please see below our updated response:

Your Ref: ECU00006176

Our Ref: 2025/132/INV

Dear Sir/Madam,

Proposal: ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION FOR Bhlaraidh Wind Farm Extension

The development has been assessed using the criteria below:

TurbineID	Status	Easting	Northing	Elevation	Tip Height
T01	Proposed	238401	821692	520	230
T02	Proposed	238367	820992	512	230
T03	Proposed	238945	821833	527	230
T04	Proposed	239499	821334	496	230
T05	Proposed	239556	821949	532	230
T06	Proposed	238277	822170	527	230
T07	Proposed	238746	820686	496	230
T08	Proposed	238776	820250	502	230
T09	Proposed	239315	820040	470	230
T10	Proposed	239569	820831	467	230
T11	Proposed	238945	821306	530	230
T12	Proposed	240026	821464	522	230
T15	Proposed	240119	820823	500	230
T16	Proposed	239848	820102	444	230
T17	Proposed	240450	821190	493	230

With reference to the above proposal, our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Inverness Airport.

Therefore, Highlands and Islands Airports Limited has no objections to the proposal.

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) then as a statutory consultee HIAL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

Kind regards,

Nyree

**From:** Niall.Macquarrie@gov.scot <Niall.Macquarrie@gov.scot>

**Sent:** 20 June 2025 08:48

**To:** Safeguarding <Safeguarding@hial.co.uk>

**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Morning Nyree,

The developer provided me with the info on the rotor and the hub height. The dev's engineering team have confirmed that the largest rotor diameter would be the worst case.

The rotor diameter will be 163m and the hub height will be 155m.

Below is a xls extract and includes the ground elevation (mAOD) for each turbine location:

TurbineID		Northing	Easting	Elevation
T01	Consented	821688	238385	518
T01	Proposed	821692	238401	520
T02	Consented	821034	238364	515
T02	Proposed	820992	238367	512
T03	Consented	821693	238925	533
T03	Proposed	821833	238945	527
T04	Consented	821326	239380	498
T04	Proposed	821334	239499	496
T05	Consented	822070	239523	534
T05	Proposed	821949	239556	532
T06	Consented	822170	238277	527
T06	Proposed	822170	238277	527
T07	Concented	820694	238704	499
T07	Proposed	820686	238746	496
T08	Consented	820273	238771	507
T08	Proposed	820250	238776	502
T09	Consented	820077	239348	462
T09	Proposed	820040	239315	470
T10	Consented	820920	239501	475
T10	Proposed	820831	239569	467
T11	Consented	821220	238876	532
T11	Proposed	821306	238945	530
T12	Consented	821460	239955	515
T12	Proposed	821464	240026	522

Scottish Government  
 Energy and Buildings  
 gov.scot

3



Nyree

**Safeguarding**

Highlands and Islands Airports Ltd  
Inverness Airport Dalcross IV2 7JB  
[www.hial.co.uk](http://www.hial.co.uk)

**Our Values**

**From:** [Niall.Macquarrie@gov.scot](mailto:Niall.Macquarrie@gov.scot) <[Niall.Macquarrie@gov.scot](mailto:Niall.Macquarrie@gov.scot)>

**Sent:** 29 May 2025 09:58

**Subject:** Request for Scoping Opinion Bhlaraidh Wind Farm Extension

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Consultee,

**ELECTRICITY ACT 1989****THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017****REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION FOR Bhlaraidh Wind Farm Extension**

On **14<sup>th</sup> May 2025**, **SSE Renewables Ltd** (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section **36C** application for the **Bhlaraidh Wind Farm Extension**.

In August 2022, the Bhlaraidh Wind Farm Extension was granted consent by the Scottish Ministers. The Consented Development comprised of a total of 15 turbines with a blade tip height of up to 180m. It had an expected installed capacity of 84 megawatts (MW) and was to be situated on Glenmoriston Estate, north-west of Invermoriston in the Great Glen.

The current request for a Scoping Opinion is for a proposed variation to the Consented Development. The Development Site boundary of the Consented Development and the Varied Development are identical. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the larger turbines. The proposed development consists of 15 turbines each with a maximum blade tip height of up to 230m. The proposed generating capacity is between 90MW to 108MW.

The proposed development is located in the planning authority area of **The Highland Council**, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Bhlaraidh Wind Farm Extension** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006176** and then click on **Documents** tab.

The indicative wind turbine OS grid co-ordinates, are found on Figure 1: S36C Scoping Report Proposed Varied Development Layout. The rotor diameter will be between 150m to 163m. The hub height will be between 148.5m to 155m.

**To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.**

I would be grateful for your comments by **19<sup>th</sup> June 2025**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Regards

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



\*\*\*\*\*

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\*\*\*\*\*

**From:** [Joint Radio Company](#)  
**To:** [Niall Macquarrie](#)  
**Cc:** [windspen@jrc.co.uk](mailto:windspen@jrc.co.uk)  
**Subject:** Re: Bhlaraidh Wind Farm Extension ECU00006176 - Scoping opinion  
**Date:** 17 June 2025 10:05:31

---

Dear Sir/Madam,

Planning Ref: ECU00006176

Name/Location: **Bhlaraidh Wind Farm Extension**

Site Centre/Turbine at NGR:

**T1 - 238401 821692**

**T2 - 238367 820992**

**T3 - 238945 821833**

**T4 - 239499 821334**

**T5 - 239556 821949**

**T6 - 238277 822170**

**T7 - 238746 820686**

**T8 - 238776 820250**

**T9 - 239315 820040**

**T10 - 239569 820831**

**T11 - 238945 821306**

**T12 - 240046 821464**

**T13 - removed**

**T14 - removed**

**T15 - 240119 820823**

**T16 - 239848 820102**

**T17 - 240450 821190**

**T18 - removed**

Development Radius: 0.1km

Hub Height: 148.5m Rotor Radius: 81.5m

JRC analyses proposals for wind energy developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

The Energy Industry considers that any wind energy development within:

- \* 1000m of a link operating below 1GHz; or
- \* 500m of a link operating above 1GHz, requires detailed coordination.

For turbines with a blade diameter of 32m or less this distance is reduced to:

- \* 500m for links below 1GHz; and
- \* 300m for links above 1GHz before a detailed coordination is required.

There is an EXCLUSION ZONE around most Base Station sites of 500m, i.e. no development is permitted. This will be evaluated on a case by case basis for smaller turbines.

Unfortunately, part (or all) of the proposed development breaches one or more of these limits.

The affected links are:

#### 460MHz Telemetry and Telecontrol:

N/A

#### >1GHz Microwave Point to Point:

Scottish & Southern Energy Distribu 1314458/1

Therefore JRC OBJECTS TO THE PROPOSED DEVELOPMENT.

Unfortunately, since these links form part of our critical national infrastructure, no details apart from the link identifiers can now be supplied, due to previous breaches in confidentiality.

However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email.

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

#### NOTE:

*The protection criteria determined for Energy Industry radio systems can be found at [Wind Farm Coordination](#) | [Joint Radio Company](#) | [JRC](#)*

Regards

Wind Farm Team

Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom

Office: 02476 932 185

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.*

*Registered in England & Wales: 2990041*

*[About The JRC](#) | [Joint Radio Company](#) | [JRC](#)*

*We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact [anita.lad@jrc.co.uk](mailto:anita.lad@jrc.co.uk).*

On Wed, 4 Jun at 10:05 AM , Niall. macquarrie <niall.macquarrie@gov.scot> wrote:

Good Afternoon,

Apologies, I've been informed from the dev just now that there's been a small change to the information below. The rotor diameter of 163m the corresponding hub height will be 148.5m.

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



From: Niall Macquarrie  
**Sent:** 04 June 2025 14:54  
**To:** wftracker@jrc.co.uk  
**Subject:** FW: Bhlaraidh Wind Farm Extension ECU00006176 - Scoping opinion

Good Afternoon,

The developer provided me with the info on the rotor and the hub height. The dev's engineering team have confirmed that the largest rotor diameter would be the worst case.

The rotor diameter will be 163m and the hub height will be 155m.

Below is a column to the table sent previously to include the ground elevation (mAOD) for each turbine location:

TurbineID		Northing	Easting	Elevation
T01	Consented	821688	238385	518
T01	Proposed	821692	238401	520
T02	Consented	821034	238364	515
T02	Proposed	820992	238367	512
T03	Consented	821693	238925	533
T03	Proposed	821833	238945	527
T04	Consented	821326	239380	498
T04	Proposed	821334	239499	496
T05	Consented	822070	239523	534
T05	Proposed	821949	239556	532
T06	Consented	822170	238277	527
T06	Proposed	822170	238277	527
T07	Concented	820694	238704	499
T07	Proposed	820686	238746	496
T08	Consented	820273	238771	507
T08	Proposed	820250	238776	502
T09	Consented	820077	239348	462
T09	Proposed	820040	239315	470
T10	Consented	820920	239501	475
T10	Proposed	820831	239569	467
T11	Consented	821220	238876	532
T11	Proposed	821306	238945	530
T12	Consented	821460	239955	515
T12	Proposed	821464	240026	522
T13	Removed	821549	240789	528
	Removed	-	-	
T14	Removed	820478	240252	451
	Removed	-	-	
T15	Consented	820784	239933	490
T15	Proposed	820823	240119	500
T16	Consented	820120	239852	441
T16	Proposed	820102	239848	444
T17	Consented	821198	240372	492
T17	Proposed	821190	240450	493
T18	Removed	821077	240876	497
	Removed	-	-	

Niall MacQuarrie | Case Officer | Energy Consents Unit  
The Scottish Government | email address  
To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



**From:** Niall Macquarrie  
**Sent:** 04 June 2025 11:08  
**To:** 'Joint Radio Company' <[wfracker@jrc.co.uk](mailto:wfracker@jrc.co.uk)>  
**Subject:** RE: Bhlaraidh Wind Farm Extension ECU00006176 - Scoping opinion

Good Morning,

Apologies for the wait. I got in touch with the dev and they provided me with the xls extract below. I'll update my timescales for a JRC response, as I understand you'll need the three weeks on receipt of this info.

TurbineID		Northing	Easting
T01	Consented	821688	238385
T01	Proposed	821692	238401
T02	Consented	821034	238364
T02	Proposed	820992	238367
T03	Consented	821693	238925
T03	Proposed	821833	238945
T04	Consented	821326	239380
T04	Proposed	821334	239499
T05	Consented	822070	239523
T05	Proposed	821949	239556
T06	Consented	822170	238277
T06	Proposed	822170	238277
T07	Concented	820694	238704
T07	Proposed	820686	238746
T08	Consented	820273	238771
T08	Proposed	820250	238776
T09	Consented	820077	239348
T09	Proposed	820040	239315
T10	Consented	820920	239501
T10	Proposed	820831	239569
T11	Consented	821220	238876
T11	Proposed	821306	238945
T12	Consented	821460	239955
T12	Proposed	821464	240026
T13	Removed	821549	240789
	Removed	-	-
T14	Removed	820478	240252
	Removed	-	-
T15	Consented	820784	239933
T15	Proposed	820823	240119
T16	Consented	820120	239852
T16	Proposed	820102	239848
T17	Consented	821198	240372
T17	Proposed	821190	240450
T18	Removed	821077	240876
	Removed	-	-

Below are the Variation proposed locations, here is the filtered table:

TurbineID		Northing	Easting
-----------	--	----------	---------

T01	Proposed	821692	238401
T02	Proposed	820992	238367
T03	Proposed	821833	238945
T04	Proposed	821334	239499
T05	Proposed	821949	239556
T06	Proposed	822170	238277
T07	Proposed	820686	238746
T08	Proposed	820250	238776
T09	Proposed	820040	239315
T10	Proposed	820831	239569
T11	Proposed	821306	238945
T12	Proposed	821464	240026
T15	Proposed	820823	240119
T16	Proposed	820102	239848
T17	Proposed	821190	240450

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)




---

**From:** Joint Radio Company <[wfracker@jrc.co.uk](mailto:wfracker@jrc.co.uk)>

**Sent:** 02 June 2025 13:08

**To:** Niall Macquarrie <[niall.macquarrie@gov.scot](mailto:niall.macquarrie@gov.scot)>

**Subject:** Re: Bhlaraidh Wind Farm Extension ECU00006176 - Scoping opinion

---

Dear Niall,

Planning Ref:ECU00006176

Location: Bhlaraidh Wind Farm Extension

Proposal: Variation of S36 Consent - Varied Development Layout

**Turbines at NGR : NOT SUPPLIED**

**Hub Height: VARIABLE**

**Blade Radius: VARIABLE**

**Thank you for providing us the opportunity to comment on this development.**

JRC analyses proposals for wind (and other) developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

*"The indicative wind turbine OS grid co-ordinates, are found on Figure 1: S36C Scoping Report Proposed Varied Development Layout. The rotor diameter will be between 150m to 163m. The hub height will be between 148.5m to 155m."*

In order to fully assess this proposal we require each turbine location as an NGR value: easting and northing. A layout plan is not sufficient detail for our required calculations.



Although indicative hub height and rotor diameter ranges have been provided, we will need the hub height and rotor diameter of each numbered turbine, to enable us to perform the appropriate calculations.

As there is a protected link that intrudes into the development area, we cannot clear this site until we have had the opportunity to undertake the required analysis. We will need an appropriate amount of time to undertake this analysis once the required turbine details have been supplied.

Therefore JRC OBJECTS to the proposed development \*\*\* *due to insufficient information* \*\*\*.

However, JRC are still willing to work with developers in order to clear as many developments as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email.

**NOTE:**

*The protection criteria determined for Energy Industry radio systems can be found at [Wind Farm Coordination](#) | [Joint Radio Company](#) | [JRC](#)*

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

Please provide the required information in order for us to undertake the necessary analysis.

Regards

Wind Farm Team

Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom

Office: 02476 932 185

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.  
Registered in England & Wales: 2990041  
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On Thu, 29 May at 5:17 AM , Niall. macquarrie <[niall.macquarrie@gov.scot](mailto:niall.macquarrie@gov.scot)> wrote:  
Dear Consultee,

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C  
APPLICATION FOR Bhlaraidh Wind Farm Extension**

On 14<sup>th</sup> May 2025, SSE Renewables Ltd (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36C application for the Bhlaraidh Wind Farm Extension.

In August 2022, the Bhlaraidh Wind Farm Extension was granted consent by the Scottish Ministers. The Consented Development comprised of a total of 15 turbines with a blade tip height of up to 180m. It had an expected installed capacity of 84 megawatts (MW) and was to be situated on Glenmoriston Estate, north-west of Invermoriston in the Great Glen.

The current request for a Scoping Opinion is for a proposed variation to the Consented Development. The Development Site boundary of the Consented Development and the Varied Development are identical. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the larger turbines. The proposed development consists of 15 turbines each with a maximum blade tip height of up to 230m. The proposed generating capacity is between 90MW to 108MW.

The proposed development is located in the planning authority area of **The Highland Council**, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Bhlaraidh Wind Farm Extension** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006176** and then click on **Documents** tab.

The indicative wind turbine OS grid co-ordinates, are found on Figure 1: S36C Scoping Report Proposed Varied Development Layout. The rotor diameter will be between 150m to 163m. The hub height will be between 148.5m to 155m.

**To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.**

I would be grateful for your comments by **19<sup>th</sup> June 2025**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Regards

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



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**From:** [Tim Allott](#) on behalf of [metofficesafeguarding](#)  
**To:** [Niall Macquarrie](#); [Econsents Admin](#)  
**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension  
**Date:** 02 June 2025 16:58:27  
**Attachments:** [image001.png](#)

---

OFFICIAL

Dear Niall,

Thanks for consulting the 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.

Therefore we have no concerns and don't need to be consulted further.

Kind regards,

Tim Allott

Upper Air Observations

**Met Office**, FitzRoy Road, Exeter, Devon, EX1 3PB, United Kingdom

E-mail: [metofficesafeguarding@metoffice.gov.uk](mailto:metofficesafeguarding@metoffice.gov.uk)

Web: <https://www.metoffice.gov.uk/services/business-industry/energy/safeguarding>

**From:** [Spectrum Licensing](#)  
**To:** [Niall Macquarrie](#)  
**Subject:** RE: Request for Scoping Opinion Bhlaraidh Wind Farm Extension  
**Date:** 05 June 2025 10:11:12

---

Dear Sir / Madam,

Thank you for contacting us.

Please note that Ofcom no longer provides a dedicated windfarm co-ordination facility.

Instead, stakeholders can now access Ofcom licence information via the Ofcom Spectrum Information System (SIS).

The SIS includes licence data for UK fixed links that are assigned and co-ordinated by Ofcom.

When using the SIS it should be noted that, there are a number of frequency bands that are now authorised on a block basis i.e. these bands are managed and assigned by the licensees themselves and the individual link information for these bands (where a band is being used for fixed links) is not held in Ofcom's licensing and assignment database nor published on the SIS. Our website has further information on these bands and the licensees details.

In addition Scanning Telemetry links, used by the utilities and other services (operating in the bands 457.5 – 458.5 MHz & 463 – 464 MHz), are managed externally by Atkins Limited and the Joint Radio Company (JRC), who can be contacted as follows:

Atkins Limited  
200 Broomielaw  
Glasgow  
G1 4RU  
Email: [windfarms@atkinsglobal.com](mailto:windfarms@atkinsglobal.com)

JRC (Joint Radio Company)  
Friars House  
Manor House Drive  
Coventry  
CV1 2TE  
Email : [windfarms@jrc.co.uk](mailto:windfarms@jrc.co.uk)  
Website: [www.jrc.co.uk/what-we-do/wind-farms](http://www.jrc.co.uk/what-we-do/wind-farms)

Please contact us if you need any further assistance.

Yours sincerely,

Ofcom Spectrum Licensing  
[Spectrum.licensing@ofcom.org.uk](mailto:Spectrum.licensing@ofcom.org.uk)  
ref:!00D580H42o.!500WT0EIIay:ref

**From:** [ONR Land Use Planning](#)  
**To:** [Econsents Admin](#)  
**Subject:** ONR Land Use Planning - Application ECU00006176 - Bhlaraidh Wind Farm Extension  
**Date:** 02 June 2025 10:27:59  
**Attachments:** [image001.png](#)  
[image001.png](#)

---

Dear Sir/Madam,

With regard to planning application ECU00006176 - Bhlaraidh Wind Farm Extension, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here: (<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Land Use Planning  
Office for Nuclear Regulation  
[ONR-Land.Use-planning@onr.gov.uk](mailto:ONR-Land.Use-planning@onr.gov.uk)

-----Original Message-----

**From:** Niall.Macquarrie@gov.scot <niall.macquarrie@gov.scot >  
**To:**  
**Cc:**  
**Sent:** 29/05/2025 09:58  
**Subject:** Request for Scoping Opinion Bhlaraidh Wind Farm Extension

You don't often get email from niall.macquarrie@gov.scot. [Learn why this is important](#)

Dear Consultee,

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)  
REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION  
FOR Bhlaraidh Wind Farm Extension**

On **14<sup>th</sup> May 2025**, **SSE Renewables Ltd** (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section **36C** application for the **Bhlaraidh Wind Farm Extension**.

In August 2022, the Bhlaraidh Wind Farm Extension was granted consent by the Scottish Ministers. The Consented Development comprised of a total of 15 turbines with a blade tip height of up to 180m. It had an expected installed capacity of 84 megawatts (MW) and was to be situated on Glenmoriston Estate, north-west of Invermoriston in the Great Glen.

The current request for a Scoping Opinion is for a proposed variation to the Consented Development. The Development Site boundary of the Consented Development and the Varied Development are identical. There are some movements to turbine locations and associated realignment of tracks and hardstands to accommodate these movements and the

larger turbines. The proposed development consists of 15 turbines each with a maximum blade tip height of up to 230m. The proposed generating capacity is between 90MW to 108MW.

The proposed development is located in the planning authority area of **The Highland Council**, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Bhlaraidh Wind Farm Extension** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006176** and then click on **Documents** tab.

The indicative wind turbine OS grid co-ordinates, are found on Figure 1: S36C Scoping Report Proposed Varied Development Layout. The rotor diameter will be between 150m to 163m. The hub height will be between 148.5m to 155m.

**To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.**

I would be grateful for your comments by **19<sup>th</sup> June 2025**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Regards

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)



\*\*\*\*\*

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This email has been scanned for viruses and malicious content, but no filtering system is 100% effective and this is no guarantee of safety or validity.



**Katie Butchart**

---

**From:** Bryan Young <Bryan.Young@sgn.co.uk>  
**Sent:** 29 May 2025 10:18  
**To:** Econsents Admin  
**Subject:** Request for Scoping Opinion Bhlaraidh Wind Farm Extension

Classified as Internal

Good morning,

SGN do not have any High Pressure assets within the vicinity of the above consultation and as such would have no comment/objection,

Kind regards

**Bryan Young**  
**Pipeline Officer**  
[Bryan.young@sgn.co.uk](mailto:Bryan.young@sgn.co.uk)  
Axis House Edinburgh  
[sgn.co.uk](http://sgn.co.uk)

Find us on [Facebook](#) and follow us on Twitter: [@SGNgas](#)



Smell gas? Call 0800 111 999

[Find out how](#) to protect your home from carbon monoxide

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**SGN is a registered trade mark and is the brand name for the companies with this Scotia Gas Networks group of companies.**

**Scotia Gas Networks Limited (company registration number 04958135) and all of its subsidiaries, except for Scotland Gas Networks plc are registered in England and Wales and have their registered office address at St Lawrence House, Station Approach, Horley, Surrey RH6 9HJ.**

**Scotland Gas Networks plc (company registration number SC264065) is registered in Scotland and has its registered office address at Axis House, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG**

Friday, 20 June 2025



Local Planner  
Energy Consents Unit  
5 Atlantic Quay  
Glasgow  
G2 8LU

Development Operations  
The Bridge  
Buchanan Gate Business Park  
Cumbernauld Road  
Stepps  
Glasgow  
G33 6FB

Development Operations  
Freephone Number - 0800 3890379  
E-Mail - [DevelopmentOperations@scottishwater.co.uk](mailto:DevelopmentOperations@scottishwater.co.uk)  
[www.scottishwater.co.uk](http://www.scottishwater.co.uk)



Dear Customer,

**Bhlaraidh Wind Farm Extension**  
**Planning Ref: ECU00006176**  
**Our Ref: DSCAS-0134092-KX2**  
**Proposal: Bhlaraidh Wind Farm Extension - Varied Development**

**Please quote our reference in all future correspondence**

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

## Drinking Water Protected Areas

A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness supplies Invermoriston Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778**.

The activity is a sufficient distance from the intake that it is likely to be low risk, however care should be taken and water quality protection measures must be implemented. It would be useful to know the estimated start date on site due to other activities taking place in this catchment simultaneously.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at [www.scottishwater.co.uk/slm](http://www.scottishwater.co.uk/slm).

We welcome that reference has been made to the Scottish Water drinking water catchment.

The fact that this area is located within a drinking water catchment should be noted in documentation. Also, anyone working on site should be made aware of this during site inductions.

We would also request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity, particularly if there are changes made to this application.

## **Asset Impact Assessment**

Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals.

The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

Written permission must be obtained before any works are started within the area of our apparatus.

## **Surface Water**

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.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

## **Next Steps:**

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter, please contact me on **0800 389 0379** or via the e-mail address below or at [planningconsultations@scottishwater.co.uk](mailto:planningconsultations@scottishwater.co.uk).

Yours sincerely,

**Angela Allison**

Development Services Analyst

[PlanningConsultations@scottishwater.co.uk](mailto:PlanningConsultations@scottishwater.co.uk)

#### **Scottish Water Disclaimer:**

*"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."*

#### **Supplementary Guidance**

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
  - Site Investigation Services (UK) Ltd
  - Tel: 0333 123 1223
  - Email: [sw@sisplan.co.uk](mailto:sw@sisplan.co.uk)
  - [www.sisplan.co.uk](http://www.sisplan.co.uk)
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Development Operations department at the above address.
- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.

- Please find information on how to submit application to Scottish Water at our Customer Portal.

Niall MacQuarrie  
Energy Consents Unit  
The Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Your ref:  
ECU00006176

Our ref:  
GB01T19K05

Date:  
09/06/2025

[Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Dear Sirs,

## **ELECTRICITY ACT 1989**

### **THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017**

#### **REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION FOR BHLARAIDH WIND FARM EXTENSION VARIATION**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

#### **Proposed Varied Development**

We understand that consent was granted in August 2022 for a scheme comprising 15 turbines with a tip height of up to 180m on the Glenmoriston Estate, north-west of Invermoriston. This consented development is immediately adjacent to the operational 32 turbine Bhlaraidh Wind Farm which was consented in 2014 and constructed in 2017. We note that the applicant is now proposing to apply to vary the consented scheme by increasing the tip height of the turbines from 180m to 230m, as well as other associated changes to infrastructure.

The nearest trunk road to the site is the A887(T), from where a dedicated access road leads to the operational windfarm. Transport Scotland was consulted on the EIAR supporting the consented scheme and provided comment in our letter dated 23<sup>rd</sup> September 2021.

#### **Assessment of Environmental Impacts**

The SR states that the forthcoming EIAR will include an updated assessment of the delivery route due to size and number of turbine component deliveries. Given the 50m increase in height, Transport Scotland considers this appropriate.

Transport Scotland will require to be satisfied that the increased size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

With regard to the assessment of general construction vehicles, we note that the following is stated:

*The Proposed Varied Development will utilise the same delivery routes, access points, and general construction approach as the Consented Development. The original EIAR concluded that construction traffic would not give rise to significant environmental effects, with increases in traffic volumes remaining below key thresholds on the strategic road network and appropriate mitigation secured through the Construction Traffic Management Plan (CTMP).*

In addition, the SR states the following:

*While the proposed turbines and supporting infrastructure (e.g. hardstands) will be marginally larger, efforts to optimise deliveries (such as sourcing aggregate on site) are expected to broadly offset any potential increases in construction traffic. As such, overall vehicle numbers are anticipated to remain in line with the original EIAR assumptions.*

As a consequence of the above statements, we note that it is proposed that further assessment of Traffic and Transport effects within the EIA Report are not required and are scoped out.

While Transport Scotland acknowledges the original EIAR conclusions, we would request that a screening assessment in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023) be provided to support the above view, in particular, the impact of the increased traffic on the A887(T) link.

We would also request that updated base traffic data be utilised, as the original EIAR used 2018 Annual Average Daily Traffic Flows (AADT). Transport Scotland would state that an appropriate source of traffic data is Traffic Scotland's National Traffic Data System. In addition, 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.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully

REDACT

**George Smith**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.



## **Marine Directorate – Science Evidence Data and Digital (MD-SEDD) advice on freshwater and diadromous fish and fisheries in relation to onshore wind farm developments.**

**July 2020 updated September 2023**

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provides internal, non-statutory, advice in relation to freshwater and diadromous fish and fisheries to the Scottish Government's Energy Consents Unit (ECU) for onshore wind farm developments in Scotland.

Atlantic salmon (*Salmo salar*), sea trout and brown trout (*Salmo trutta*) are of high economic value and conservation interest in Scotland and for which MD-SEDD has in-house expertise. Onshore wind farms are often located in upland areas where salmon and trout spawning and rearing grounds may also be found. MD-SEDD aims, through our provision of advice to ECU, to ensure that the construction and operation of these onshore developments do not have a detrimental impact on the freshwater life stages of these fish populations.

The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity Index and support valuable recreational fisheries.

A good working relationship has been developed over the years between ECU and MD-SEDD, which ensures that these fish species are considered by ECU during all stages of the application process of onshore wind farm developments and are similarly considered during the construction and operation of future onshore wind farms. It is important that matters relating to freshwater and diadromous fish and fisheries, particularly salmon and trout, continue to be considered during the construction and operation of future onshore wind farms.

In the current document, MD-SEDD sets out a revised, more efficient approach to the provision of our advice, which utilises our generic scoping and monitoring programme guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>). This standing advice provides regulators (e.g. ECU, local planning authorities), developers and consultants with the information required at all stages of the application process for onshore wind farm developments, such that matters relating to freshwater and diadromous fish and fisheries are addressed in the same rigorous manner as is currently being carried out and continue to be fully in line with EIA regulations. At the request of ECU, MD-SEDD will still be able to provide further and/or bespoke advice relevant to freshwater and diadromous fish and fisheries e.g. site specific advice, at any stage of the application process for a proposed development, particularly where a development may be considered sensitive or contentious in nature.

MD-SEDD will continue undertaking research, identifying additional research requirements, and keep up to date with the latest published knowledge relating to the

impacts of onshore wind farms on freshwater and diadromous fish populations. This will be used to ensure that our guidelines and standing advice are based on the best available evidence and also to continue the publication of the relevant findings and knowledge to all stakeholders including regulators, developers and consultants.

#### MD-SEDD provision of advice to ECU

- MD-SEDD should not be asked for advice on pre application and application consultations (including screening, scoping, gate checks and EIA applications). Instead, the MD-SEDD scoping guidelines and standing advice (outlined below) should be provided to the developer as they set out what information should be included in the EIA report;
- if new issues arise which are not dealt with in our guidance or in our previous responses relating to respective developments, MD-SEDD can be asked to provide advice in relation to proposed mitigation measures and monitoring programmes which should be outlined in the EIA Report (further details below);
- if new issues arise which are not dealt with in our guidance or in our previous responses, MD-SEDD can be asked to provide advice on suitable wording, within a planning condition, to secure proposed monitoring programmes, should the development be granted consent;
- MD-SEDD cannot provide advice to developers or consultants, our advice is to ECU and/or other regulatory bodies.
- if ECU has identified specific issues during any part of the application process that the standing advice does not address, MD-SEDD should be contacted.

#### MD-SEDD Standing Advice for each stage of the EIA process

##### Scoping

MD-SEDD issued generic scoping guidelines

(<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

If a developer identifies new issues or has a technical query in respect of MD-SEDD generic scoping guidelines then ECU should be informed who will then co-ordinate a response from MD-SEDD.

## Gate check

The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application.

Developers will be required to provide a gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.

## EIA Report

MD-SEDD will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/status/Pressures>). The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process:

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:

- any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area;
- the presence of a large density of watercourses;
- the presence of large areas of deep peat deposits;
- known acidification problems and/or other existing pressures on fish populations in the area; and
- proposed felling operations.

## Post-Consent Monitoring

MD-SEDD recommends that a water quality and fish population monitoring programme is carried out to ensure that the proposed mitigation measures are effective. A robust, strategically designed and site specific monitoring programme conducted before, during and after construction can help to identify any changes, should they occur, and assist in implementing rapid remediation before long term ecological impacts occur.

MD-SEDD has published guidance on survey/monitoring programmes associated with onshore wind farm developments (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which developers should follow when drawing up survey and/or monitoring programmes.

If a developer considers that such a monitoring programme is not required then a clear justification should be provided.

### Planning Conditions

MD-SEDD advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent. We recommend, where required, that a Water Quality Monitoring Programme, Fisheries Monitoring Programme and the appointment of an Ecological Clerk of Works, specifically in overseeing the above monitoring programmes, is outlined within these conditions and that MD-SEDD is consulted on these programmes.

Wording suggested by MD-SEDD in relation to water quality, fish populations and fisheries for incorporation into planning consents:

1. No development shall commence unless a Water Quality and Fish Monitoring Plan (WQFMP) has been submitted to and approved in writing by the Planning Authority in consultation with Marine Directorate – Science Evidence Data and Digital (MD–SEDD) and any such other advisors or organisations.
2. The WQFMP must take account of the Scottish Government’s MD-SEDD guidelines and standing advice and shall include:
  - a. water quality sampling should be carried out at least 12 months prior to construction commencing, during construction and for at least 12 months after construction is complete. The water quality monitoring plan should include key hydrochemical parameters, turbidity, and flow data, the identification of sampling locations (including control sites), frequency of sampling, sampling methodology, data analysis and reporting etc.;
  - b. the fish monitoring plan should include fully quantitative electrofishing surveys at sites potentially impacted and at control sites for at least 12 months before construction commences, during construction and for at least 12 months after construction is completed to detect any changes in fish populations; and
  - c. appropriate site specific mitigation measures detailed in the Environmental Impact Assessment and in agreement with the Planning Authority and MD-SEDD.
3. Thereafter, the WQFMP shall be implemented within the timescales set out to the satisfaction of the Planning Authority in consultation with MD- SEDD and the results of such monitoring shall be submitted to the Planning Authority on a 6 monthly basis or on request.

**Reason:** To ensure no deterioration of water quality and to protect fish populations within and downstream of the development area.

### Sources of further information

NatureScot (previously “SNH”) guidance on wind farm developments -

<https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/renewable-energy-development/onshore-wind-energy/advice-wind-farm>

Scottish Environment Protection Agency (SEPA) guidance on wind farm developments –

<https://www.sepa.org.uk/environment/energy/renewable/#wind>

A joint publication by Scottish Renewables, NatureScot, SEPA, Forestry Commission Scotland, Historic Environment Scotland, Marine Scotland Science (now MD-SEDD) and Association of Environmental and Ecological Clerks of Works (2019) Good Practice during Wind Farm Construction -

<https://www.nature.scot/guidance-good-practice-during-wind-farm-construction>.

## Annex 1 (revised September 2023)

### Marine Directorate – Science Evidence Data and Digital (MD-SEDD) – EIA Checklist

The generic scoping guidelines should ensure that all matters relevant to freshwater and diadromous fish and fisheries have been addressed and presented in the appropriate chapters of the EIA report. Use of the checklist below should ensure that the EIA report contains the following information; the absence of such information ***may necessitate requesting additional information*** which could delay the process:

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. A map outlining the proposed development area and the proposed location of: <ul style="list-style-type: none"><li>○ the turbines,</li><li>○ associated crane hard standing areas,</li><li>○ borrow pits,</li><li>○ permanent meteorological masts,</li><li>○ access tracks including watercourse crossings,</li><li>○ all buildings including substation, battery storage;</li><li>○ permanent and temporary construction compounds;</li><li>○ all watercourses; and</li><li>○ contour lines;</li></ul>			

<p>2. A description and results of the site characterisation surveys for fish (including fully quantitative electrofishing surveys) and water quality including the location of the electrofishing and fish habitat survey sites and water quality sampling sites on the map outlining the proposed turbines and associated infrastructure.</p> <p><b>This should be carried out where a Special Area of Conservation (SAC) is present and where salmon are a qualifying feature, and in exceptional cases when required in the scoping advice for other reasons. In other cases, developers can assume that fish populations are present;</b></p>			
<p>3. An outline of the potential impacts on fish populations and water quality within and downstream of the proposed development area;</p>			
<p>4. Any potential cumulative impacts on the water quality and fish populations associated with adjacent (operational and consented) developments including wind farms, hydro schemes, aquaculture and mining;</p>			

<p>5. Any proposed site specific mitigation measures as outlined in <b>MD-SEDD</b> generic scoping guidelines and the joint publication “Good Practice during Wind Farm Construction” (<a href="https://www.nature.scot/guidance-good-practice-during-wind-farm-construction">https://www.nature.scot/guidance-good-practice-during-wind-farm-construction</a>);</p>			
<p>6. Full details of proposed monitoring programmes using guidelines issued by <b>MD-SEDD</b> and accompanied by a map outlining the proposed sampling and control sites in addition to the location of all turbines and associated infrastructure.</p> <p><b>At least 12 months of baseline pre-construction data should be included. The monitoring programme can be secured using suitable wording in a condition.</b></p>			
<p>7. A decommissioning and restoration plan outlining proposed mitigation/monitoring for water quality and fish populations.</p> <p><b>This can be secured using suitable wording in a condition.</b></p>			



Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to <b>MD-SEDD</b> advice, please set out reasons.
1. Any designated area ( <b>e.g. SAC</b> ), for which fish is a qualifying feature, within and/or downstream of the proposed development area;			
2. The presence of a large density of watercourses;			
3. The presence of large areas of deep peat deposits;			
4. Known acidification problems and/or other existing pressures on fish populations in the area; and			
5. Proposed felling operations.			