

# Appendix 3.5 Post Scoping Consultation

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Babcock International  
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Highlands and Islands Airports Limited (HIAL)  
Joint Radio Company (JRC)  
Marine Scotland Science (MSS)  
Nature Scot / Scottish Natural Heritage (SNH)  
Ness District Salmon Fishery Board / Ness & Beaully Fisheries Trust  
PDG Aviation  
Police Scotland  
Scottish Environment Protection Agency (SEPA)  
The Highland Council (THC)  
THC Environmental Health Officer (EHO)  
THC Historic Environment Team (HET)

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From: "[REDACTED]" <[REDACTED]@babcockinternational.com>

To: "[REDACTED]" <[REDACTED]@babcockinternational.com>,  
Malcolm Spaven

<[REDACTED]>

Subject: Re: CAUTION: External email - Lighting scheme: Bhlaraidh Extension  
wind farm

Date: Tue, 2 Mar 2021 11:18:43 +0000

Hi Malcolm,

For the same reasons that [REDACTED] outlines, I am happy that the Babcock Air Ambulance operation for SCAA would not be unduly affected by the absence of visible obstruction lighting on the proposed extension to the Bhlaraidh windfarm.

Thanks for the consultation.

Best regards,

[REDACTED]

[REDACTED] | Regional Managing Pilot (Scotland)

UK Aviation | Aviation

Babcock International Group

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## Bristow Group

From: [REDACTED] <[REDACTED]@bristowgroup.com>  
To: Malcolm Spaven [REDACTED]  
CC: [REDACTED] <[REDACTED]@bristowgroup.com>,  
[REDACTED] <[REDACTED]@bristowgroup.com>,  
[REDACTED] <[REDACTED]@bristowgroup.com>,  
[REDACTED] <[REDACTED]@bristowgroup.com>

Subject: RE: Lighting scheme: Bhlaraidh Extension wind farm  
Date: Wed, 5 May 2021 12:00:09 +0000

Hi Malcolm,

Having reviewed the attached document I have no issue with proposed extension to the windfarm with respect to the Bristow UK SAR operation. I will re-iterate, as I always do, the importance of lighting the turbines with IR lighting (that can be seen with NVIS devices) in such a way that the entire boundary of the development is clearly delineated. This proposal appears to do that.

Also, of vital importance is that the development plus any additional survey masts/ pylons etc are clearly recorded on aviation charts and databases. The height of the new turbines is the reason I emphasize the mapping issue. If they weren't marked correctly, then there is a chance an aircraft could be operating IFR or Night Visual Contact without NVIS devices at 1000ft agl and with these turbines being up to 180m (590 ft) agl, an aircraft in that configuration would start to get close to these obstructions. Furthermore, these turbines are getting quite close (within 5nm) to the Great Glen and some aircraft might operate Night Visual Contact at 1000ft agl up this popular route (which might make the lack of visual lighting an issue for other operators).

Finally, I suspect this has already been done but given this development is close Inverness airport, they might want to check that it's not going to interfere with ATC radar coverage, the SAS helicopter service and RAF Lossiemouth operations.

Feel free to call if you have any further questions.

Kind Regards,

[REDACTED]

Captain [REDACTED]  
Deputy Chief Pilot  
UK Search and Rescue - Inverness

[REDACTED] [\[REDACTED\]@bristowgroup.com](mailto:[REDACTED]@bristowgroup.com)  
Tel +44 (0)1667 [REDACTED]  
Mob +44 (0) [REDACTED]

Bristow Helicopters Limited  
Inverness Airport  
Dalcross  
IV2 7JB

## British Telecommunications (BT)

## Sarah Tullie

---

**From:** [REDACTED] on behalf of [REDACTED]  
**Sent:** 23 April 2021 12:53  
**To:** Sarah Tullie  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation on Bhlaraidh Wind Farm Extension WID11504



### OUR REF; WID114504 T1-18

Dear Sir/Madam

Thank you for your email dated 16/04/2021.

We have studied this Windfarm proposal 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.

Please see below screen shot where the proposed Windfarm locations from the co-ordinates provided are shown as red dots. The location clearly passes our required 100 metre infringement zone of any active radio links (purple line).





Please direct all queries to [REDACTED]

Regards

**Lisa Smith**  
Radio Planning  
Networks - Engineering Services



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---

**From:** Sarah Tullie <[REDACTED]>  
**Sent:** 16 April 2021 11:27  
**To:** radionetworkprotection G [REDACTED]  
**Subject:** Consultation on Bhlaraidh Wind Farm Extension WID11504

Dear Sirs,

I am writing on behalf of my client, SSE Renewables, with regard to a proposed 18 turbine extension to the Operational Bhlaraidh Wind Farm in the Highlands.

You previously provided a response at Scoping stage which indicated the proposed extension was cleared with respect to your infrastructure, and I would appreciate if you could confirm the final turbine locations are cleared. The proposed development details are given below:

12-character UK NGR for the site centre: x:239512 y:820991

Search radius from the site centre: 1500m

Site name: Bhlaraidh Wind Farm Extension

Nearest town: Invermoriston, Highlands

Email address for reply: [REDACTED]

Details of the individual turbines are given in the table below:

| <b>Turbine</b> | <b>Easting</b> | <b>Northing</b> | <b>Max Tip Height (m)</b> | <b>Max Rotor Diameter (m)</b> |
|----------------|----------------|-----------------|---------------------------|-------------------------------|
| T01            | 238385         | 821688          | 180                       | 158                           |
| T02            | 238364         | 821034          | 180                       | 158                           |
| T03            | 238925         | 821693          | 180                       | 158                           |
| T04            | 239380         | 821326          | 180                       | 158                           |
| T05            | 239523         | 822070          | 180                       | 158                           |
| T06            | 238277         | 822170          | 180                       | 158                           |
| T07            | 238704         | 820694          | 180                       | 158                           |
| T08            | 238771         | 820273          | 180                       | 158                           |
| T09            | 239348         | 820077          | 180                       | 158                           |
| T10            | 239501         | 820920          | 180                       | 158                           |
| T11            | 238876         | 821220          | 180                       | 158                           |
| T12            | 239955         | 821460          | 180                       | 158                           |
| T13            | 240789         | 821549          | 180                       | 158                           |
| T14            | 240252         | 820478          | 180                       | 158                           |
| T15            | 239933         | 820784          | 180                       | 158                           |
| T16            | 239852         | 820120          | 180                       | 158                           |
| T17            | 240372         | 821198          | 180                       | 158                           |
| T18            | 240876         | 821077          | 180                       | 158                           |

I would be most grateful for information on BT's radio network links in the area, which have the potential to be affected by this development.

Please let me know if there is any further information required.

Kind regards,  
Sarah

Sarah Tullie | **Consultant** | ITPEnergised

Mobile: [REDACTED]

[www.itpenergised.com](http://www.itpenergised.com)

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Civil Aviation Authority (CAA)

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

25 June 2021  
Ref Windfarms/Bhlaraidh Extension

Dear Malcolm,

**Proposed Obstacle Lighting Scheme for Bhlaraidh Extension Wind Farm, Highland**

Reference: [1] Aviatica Report No.20/859/SSE/3, e-mailed 22 February 2021  
[2] Aviatica Report No.20/859/SSE/4, e-mailed 26 May 2021  
[3] Additional supporting information, e-mailed 28 May 2021

1. Thank you for the e-mails at reference [1], [2] and [3]. The attached reports discuss the proposed obstacle lighting plan for the Bhlaraidh Extension wind farm.
2. The proposed Bhlaraidh Extension is an 18-turbine extension to the existing wind farm at Bhlaraidh, 35km south west of Inverness, Highland. The existing wind farm consists of 32 turbines with tip heights of 135 metres above ground level (AGL) and is fitted with infra-red lighting on seven cardinal turbines. The proposed Bhlaraidh Extension turbines will have tip heights of 180m AGL.
3. The proposed lighting scheme for the Bhlaraidh Extension wind farm aims to identify the corners and perimeter of the combined Bhlaraidh and Bhlaraidh Extension wind farms, using infra-red lighting only, extending the lighting scheme design of the Bhlaraidh wind farm to the combined Bhlaraidh and Bhlaraidh Extension development.
4. We note the concerns expressed by NatureScot during the Local Planning Authority consultation on the proposed development that the introduction of [obstacle] lighting, which is likely to be visible over large distances, could result in significant adverse impacts on the qualities of [the nearby] Central Highlands Wild Land Area.
5. The lighting scheme for the adjacent existing Bhlaraidh wind farm was developed in consultation with the Ministry of Defence (MoD). We have taken the following into consideration:
  - The proposed Bhlaraidh Extension wind farm is located immediately to the east of the existing Bhlaraidh wind farm and will extend the area of turbines eastwards by

2.7km. The minimum gap between the Bhlaraidh and Bhlaraidh Extension turbines will be 475 metres and the two schemes will appear as a single integral wind farm if the extension is consented and built.

- The proposed Extension turbines, although 45 metres higher above ground level than those of the existing Bhlaraidh wind farm, are predominantly located on lower ground. The highest blade tips in the Extension will be 2346 feet above sea level, slightly lower than the maximum 2395 feet above sea level of the existing wind farm
- Night Visual Flight Rules (VFR) operations from Inverness Airport, 25 nautical miles from the proposed development, include regular operational and training flights by the based SAR and air ambulance helicopters, and occasional night training flights by aircraft from Highland Aviation Training.
- The local terrain (including options for forced landings), availability of nearby open airfields at night as well as general weather considerations result in a very low likelihood of light fixed-wing aircraft flying at low level at night over this area;
- SAR, Scottish Air Ambulance Service and Police Scotland Air Support Unit are certified, equipped and crewed to use NVGs to aid VFR flight at night. Transit flights at low level at night are carried out using NVGs and/or at heights that ensure vertical separation from obstacles.
- While the SCAA helicopters at Perth and Aberdeen are not currently NVG-equipped, their hours of operation do not extend beyond 1900hrs local time. They may undertake night transit flights between lit and surveyed sites but operations to unlit sites at night are not permitted. Night VFR transit flights are flown at altitudes and on routes that ensure horizontal and/or vertical clearance from charted obstacles, whether lit or unlit.

6. We note the helpful comments from Bristow Helicopters in response to your consultation with them on the proposed lighting scheme for the Bhlaraidh Extension, which included "Night Visual Contact without NVIS devices at 1000ft AGL and with these turbines being up to 180m (590 ft) AGL, an aircraft in that configuration would start to get close to these obstructions. Furthermore, these turbines are getting quite close (within 5nm) to the Great Glen and some aircraft might operate Night Visual Contact at 1000ft AGL up this popular route (which might make the lack of visual lighting an issue for other operators)." We believe that the additional safeguards offered by UK SERA.5005 in respect of night VFR requirements would also need to be taken into account by any operator considering such operations.

7. Therefore, the CAA confirms that in accordance with the Air Navigation Order (ANO) Article 222 section 6, we agree a variation to the lighting requirements specified in the ANO Article for the Bhlaraidh Extension wind farm as per the proposed lighting scheme as follows:

- No visible obstacle lights on the Bhlaraidh Extension wind farm turbines
- infra-red lights to MoD specification installed on the nacelles of perimeter turbines: Turbines 2, 5, 7, 13, 18, 28 and 31.

8. Please let me know if you have any further queries.

Yours sincerely,



Andy Wells  
Manager Policy

**Sarah Tullie**

---

**From:** [REDACTED]  
**Sent:** 01 July 2021 14:43  
**To:** Malcolm Spaven  
**Cc:** Toothill, Ian  
**Subject:** [EXTERNAL] RE: 20210528BhlaraidhExtensionWindFarmAviaticaAdditionalInformationSupportingVariationRequest  
**Attachments:** 20210625BhlaraidhLightingLetterAviatica.pdf

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

\*\*\*\*\*

Hi Malcom,

Please see the attached letter regarding the Bhlaraidh Extension Art 222 Obstacle Lighting variation request.

Kind regards

Andy

Andy Wells  
Interim Manager Policy (Infrastructure)  
Safety and Business Delivery  
Civil Aviation Authority

Tel: [REDACTED]

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

**From:** [REDACTED]  
**Sent:** 28 May 2021 20:29  
**To:** [REDACTED]  
**Subject:** 20210528BhlaraidhExtensionWindFarmAviaticaAdditionalInformationSupportingVariationRequest

Andy

Many thanks for dealing with this. Co-ordinates of operational Bhlaraidh turbines and proposed Bhlaraidh Extension turbines are attached.

Best regards

Malcolm

At 19:07 28/05/2021, you wrote:

>Hi Malcolm,

>

>Thanks for the update to this report and for the conversation late in  
>the day today.

>

>As part of our deliberations over the unlit 180m turbines and, in  
>particular, noting the comments from Bristow Helicopters, could you  
>provide me with the lat/longs of both the existing and the proposed  
>turbines and their heights AMSL? This would allow us to compare this  
>with the heights of the high ground in the vicinity.

>

>Kind regards

>

>Andy

>

>

>Andy Wells

>Interim Manager Policy (Infrastructure) Safety and Business Delivery

>Civil Aviation Authority

>

>Tel: [REDACTED]

>

>Due to the Covid-19 outbreak and in line with Government guidance, our  
>staff are working from home and our offices are not currently open to  
>walk-in visitors.

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>You can help us through this unprecedented time by not communicating  
>with us via traditional post as far as possible. Instead, please email  
>us until further notice.

>

>Please see our guidance relating to COVID-19 for more information

>

>

>

>

>

>

>

>-----Original Message-----

>From: [REDACTED]

>Sent: 26 May 2021 12:22

>To: [REDACTED]

>Subject: Lighting scheme: Bhlaraidh Extension wind farm

>

>Hi Andy

>

>As advised on your voicemail, here is the updated version of our  
>proposal for an alternative lighting scheme for the Bhlaraidh Extension  
>wind farm near Inverness.

>



>I originally sent you our proposal for this scheme on 22nd February and  
>advised that I would forward on the responses from local airspace  
>consultees when I received them. We now have all those responses and  
>they have been appended to the report, which is attached. The attached  
>version of the report supercedes the one sent in Feb.

>

>Please advise if you need any other information in order to make a  
>decision on this scheme.

>

>Thanks for your help.

>

>Best regards

>

>Malcolm

>\*\*\*\*\*

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## Defence Infrastructure Organisation (DIO)

From: "[REDACTED] (DIO Estates-SafegdgMgr1)"  
<[REDACTED]@mod.gov.uk>  
To: Malcolm Spaven <[REDACTED]>  
Subject: 20210430\_MOD\_Response\_lighting\_Bhlaraidh\_Extension  
Date: Fri, 30 Apr 2021 10:57:10 +0000

Good Morning Malcolm,

DIO10046103 - Bhlaraidh WF Extension.

Thank you for your email in regards to lighting for the above named development.

MOD responded to scoping opinion requesting lighting IAW the CAA ANO, The MOD has reviewed your lighting proposal for IR lighting only and I can confirm i can confirm that the MOD is content with IR lighting on the perimeter turbines.

Kindest regards

[REDACTED]

Safeguarding Manager  
Estates - Safeguarding

Due to covid-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on [REDACTED].

Defence  
Infrastructure  
Organisation

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Building 49, DIO Sutton Coldfield, Kingston Road, B75 7RL

Mobile Tel: [REDACTED] .

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Website: [www.gov.uk/dio/](http://www.gov.uk/dio/) šš□šš Twitter: @mod\_dio

Read DIO's blog: <https://insidedio.blog.gov.uk/>

■

## Gama Aviation

From: [REDACTED] <[REDACTED]@gamaaviation.com>  
To: Malcolm Spaven [REDACTED]  
Subject: Re: Lighting scheme: Bhlaraidh Extension wind farm  
Date: Fri, 14 May 2021 10:06:56 +0000

Hello Malcolm,

Please accept my apologies for the late reply.

I've had a look at the proposal and see no issue with it from our point of view. Again, I think the most important thing is consistency with the lighting with surrounding wind farms and this seems to be the objective here.

Hope this helps but should you require any more then please let me know.

Best regards,

[REDACTED]

**Gama Aviation** 

[REDACTED]: **Base Manager Inverness**

Inverness Airport, Inverness, Inverness-shire, IV2 7JB, GB  
E [REDACTED]@gamaaviation.com

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## Historic Environment Scotland (HES)

**Sarah Tullie**

---

**Subject:** FW: 300037514 - RE: Proposed Bhlaraidh Extension-Visualisation Consultation

---

**From:** Chloe Porter <[REDACTED]>  
**Sent:** 03 March 2021 11:24  
**To:** Victoria Oleksy <[REDACTED]>  
**Subject:** RE: 300037514 - RE: Proposed Bhlaraidh Extension-Visualisation Consultation

Good morning Victoria,

We have reviewed the information submitted.

We are content to agree the wireline taken from Loch Ness and marking the location of Urquhart Castle as we had suggested.

Kind Regards,

Chloé

**Chloé Porter (MRTPI) | Senior Environmental Assessment and Advice Officer | Environmental Assessment and Advice Team | Heritage Directorate**

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Longmore House, Salisbury Place, Edinburgh EH9 1SH

**T:** [REDACTED]  
**M:** [REDACTED]  
**E:** [REDACTED]

[www.historicenvironment.scot](http://www.historicenvironment.scot)

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**From:** Victoria Oleksy [REDACTED]  
**Sent:** 22 February 2021 14:26  
**To:** Chloe Porter <[REDACTED]>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: 300037514 - RE: Proposed Bhlaraidh Extension-Visualisation Consultation

Dear Chloe,

Thank you for your email.

As requested, please see attached a wireline taken from Loch Ness and marking the location of Urquhart Castle. The position chosen for this wireline, replicates the location of an LVIA viewpoint (VP7), which was included and approved as part of the consented planning application for the now operational Bhlaraidh Wind Farm. This viewpoint was described as "*view from the loch, on approach to Urquhart Castle, similar to that gained from Jacobite Cruises*". The wireline indicates only one turbine tip of the proposed Bhlaraidh Extension Wind Farm would be theoretically visible alongside four tips of the operational wind farm.

Please note that in order to produce this wireline several assumptions have had to be made about water level, boat type and therefore height of viewer. These assumptions are noted on the wireline.

We hope this will allow you to compare with the loch side viewpoints we have provided wirelines for already and would particularly note again that proposed Viewpoint 8 will provide a similar and 'worst case scenario' view across the loch from a location which shows theoretical visibility of both the Proposed Development and operational Bhlaraidh Wind Farm, with Urquhart Castle also in the view.

As noted previously, Viewpoints 8, 17 and 4 will be provided as full photomontages in the EIAR. Can you please confirm whether you are content that that this will provide sufficient information to make an assessment of the potential impacts upon the setting of Urquhart Castle?

We look forward to hearing from you due course.

Best,

Vicky

---

**From:** Chloe Porter [REDACTED]  
**Sent:** 17 February 2021 14:57

**To:** Victoria Oleksy [REDACTED]

**Subject:** RE: 300037514 - RE: Proposed Bhlaraidh Extension-Visualisation Consultation

Dear Victoria,

We note you are not proposing to create visualisations from the cruise boat that takes many visitors to Urquhart Castle via Loch Ness as we recommended. Instead you suggest that Viewpoints 8 and 17 on the shore would not be materially different and could illustrate the worst case scenario for views to Urquhart from across Loch Ness.

We are concerned about potential visual impacts on views to the castle on approach using the Jacobite cruise ships because this is how many visitors approach the castle. While the distance to, and general visibility of, the turbines may be similar for the Loch side viewpoints they would not illustrate what the relationship between the proposed turbines and the castle would be in views from the boat. As you will understand the relationship between the proposed turbines and the castle will vary considerably depending on location, for example would the proposed turbines be directly behind the castle when approached by boat from the Loch?

That said, we do understand that the cruise is unlikely to be running at the moment and this might make obtaining a photomontage difficult. In the first instance perhaps you could consider producing a wireline from the loch, from a location on the approach of the Jacobite cruise ship, and clearly label it to show the castle's location on the wireline. This will allow us some insight into the visibility of the proposed turbines and their relationship to the castle on this approach. We will then be able to advise whether that, in combination with Loch side photomontages, would provide sufficient information to inform assessment and mitigation if appropriate.

We are content that the LVIA Viewpoint 4 would satisfy our request for a viewpoint taken from the north side of the Loch and incorporating Urquhart Castle.

We hope this is helpful,

Kind Regards,

Chloé

**Chloé Porter (MRTPI) | Senior Environmental Assessment and Advice Officer | Environmental Assessment and Advice Team | Heritage Directorate**



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Longmore House, Salisbury Place, Edinburgh EH9 1SH

T: [REDACTED]

M: [REDACTED]

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**From:** Victoria Oleksy [REDACTED]

**Sent:** 01 February 2021 16:22

**To:** [REDACTED]

**Subject:** RE: Proposed Bhlaraidh Extension-Visualisation Consultation

Dear Chloe and Alison,

We have reviewed your comments on visualisations required to support the EIAR for the proposed Bhlaraidh Extension Wind Farm as set out in your email of 21st September 2020 and your response to the Gatecheck report on 24th November 2020.

In particular we note your request for a viewpoint on the northern shore of Loch Ness looking southwest towards Urquhart Castle and a viewpoint taken from the cruise boats that operate along Loch Ness.

**Viewpoint from cruise boat Loch Ness**

Having discussed this with the project's LVIA consultants we understand that a viewpoint from a boat in Loch Ness was included in the original Bhlaraidh Wind Farm LVIA (as VP 7) but for the extension proposal, VP 8 on the loch shores has been agreed with NatureScot and the council's landscape officer (at Scoping and in consequent consultation in October 2019 and June 2020) instead to illustrate low-level views which would be similar to those from the loch itself.

LVIA VPs 8 and 17 will allow for an appreciation of potential effects from the loch/lochside including views across to Urquhart Castle. A full set of visualisations to NatureScot and THC standards will be produced from these VPs, including wirelines and photomontages. Wirelines are attached here for your consideration.

On the basis of the above, it is considered that views from a cruise boat at the centre of the loch are unlikely to be materially different to the lochside viewpoints already proposed, and in fact, based on wirelines run from the centre of the loch, we would note that fewer proposed turbines would be theoretically visible from the loch than from the VP 8 shore location and VP 17 elevated location. As such, VPs 8 and 17 can be considered to illustrate the worst-case scenario. In addition, as per the ZTV, the proposed development would not be visible from much of the loch. Given this and the fact that current Covid restrictions are likely to make access to a cruise boat difficult, if not impossible, it is not proposed to provide a viewpoint from the centre of the loch.

Can you confirm that you are content that VPs 8 & 17 be referred to in assessing impacts upon the setting of Urquhart Castle and that you are content that we do not include a viewpoint from the centre of the loch?

**View from the northern shore of Loch Ness towards Urquhart Castle**

The ZTV indicates that there is minimal theoretical visibility from limited sections along the northern shores of Loch Ness (between 1-5 turbines theoretically visible between Kerrowdown Farm and the area east of Tychat), and given roadside screening, it is likely that there would be no actual visibility of the proposed development. The revised location of LVIA Viewpoint 4 is located on a minor public road near Balnacraig, north of the main A82 road, and to the northwest of Urquhart Castle. Whilst we note that this is a position further west than indicated by your comments in your response to the Gatecheck, it is the position along the northern loch shore which offers both views of the proposed turbines and Urquhart Castle. On this basis we propose to refer to this viewpoint in

assessment of the potential impacts upon the setting of the castle. As with the viewpoints noted above this would be presented in the EIAR as a full photomontage with wirelines and baseline photos to both NatureScot and THC specifications.

Can you confirm that LVIA Viewpoint 4 will satisfy your request for a viewpoint taken from the north side of the loch which incorporates Urquhart Castle? A wireline from this location is provided for your consideration.

If you want to discuss further, please do not hesitate to contact me.

Best,  
Vicky

---

**From:** Chloe Porter [REDACTED]

**Sent:** 21 September 2020 10:10

**To:** Victoria Oleksy [REDACTED]

**Subject:** RE: Proposed Bhlaraidh Extension-Visualisation Consultation

Good morning Victoria,

I am Chloé Porter and I am replacing Urszula while she is on maternity leave.

Thank you for your email, here are our comments:

**Levishie Cottage SM4567** – We note that the impact appears to be fairly limited which is positive. We welcome a wireline.

**Urquhart Castle SM90309** – We note that a specific cultural heritage viewpoint is not proposed as the asset lies outwith the ZTV. We would suggest the developers be reminded that inward views towards the castle also form part of its setting, and that these inward views may themselves lie within the ZTV. Such views would include those from the northern shore of the loch looking south-west down the loch towards the castle, and those from the far side of the loch looking across to the castle, as well as those from the water itself. Although a modern construct, the view from the cruise boats that ply the waters from Inverness down to Urquhart is one where many people first experience the castle and its setting, and we would expect that to be taken into consideration.

We agree that viewpoints 8 and 21 on the southern/eastern side of the loch may be sufficient approximations in order to assess impact on cultural heritage, but we would suggest that the applicant also looks at taking a viewpoint from the centre of the loch on the route that the cruise boats take. This approach has precedent elsewhere – for Sheridrim on Kintyre, viewpoints for a windfarm have been taken from moving ferries as an approximation of impact from a marine context.

In conclusion, we are content with the approach at Levishie but we would suggest a viewpoint from a cruiseboat for Urquhart Castle.

Kind Regards,  
Chloé

**Chloé Porter (AssocRTPI) | Senior Casework Officer | Heritage Directorate**

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Historic Environment Scotland | Àrainneachd Eachdraidheil Alba  
Longmore House, Salisbury Place, Edinburgh EH9 1SH

**T:** [REDACTED]

**M:** [REDACTED]

**E:** [REDACTED]

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**From:** Victoria Oleksy [REDACTED]

**Sent:** 04 September 2020 09:08

**To:** Urszula Szpyszynska [REDACTED]

**Cc:** HM - Consultations [REDACTED]

**Subject:** Proposed Bhlaraidh Extension-Visualisation Consultation

Dear Urszula,

I hope this finds you well.

I write with reference to your Scoping Opinion for the proposed Bhlaraidh Wind Farm Extension dated 9<sup>th</sup> August 2019 (HES Case ID: 300037514) and to consult you on proposed visualisations to accompany the EIAR.

I note from the Scoping Opinion your request that the EIAR be supported by visualisations from Levishie Cottage, fort and earthwork 1050m NE of (SM4567) and from Urquhart Castle (SM90309).

I attach a plan showing designated heritage assets against the ZTV. Please note the Listed Buildings are labelled by Designation Reference, for legibility, and all other designation types are labelled by name.

Levishie Cottage, fort and earthwork will lie partially within the ZTV with up to three turbine tips theoretically visible. Also attached is a draft wireline showing the extent of the visibility from Levishie. Given the limited extent of visibility it is proposed that a wireline will be produced for the EIAR.

As indicated by the attached plan Urquhart Castle lies outwith the ZTV. There is some potential for views of one or two turbines from the north side of Urquhart Bay along the A82 where turbines would be offset to the west of the castle. Similarly, there also potential for some limited visibility, between one and five turbines, from the eastern side of Loch Ness along the B852 in the vicinity of Erchite Woods and Blanfoich Coverts. The Archaeology and Cultural Heritage Chapter will cross-refer to LVIA viewpoint 8 (see attached plan indicating the proposed LVIA viewpoints) in this regard and it is not intended to produce a cultural heritage specific viewpoint for Urquhart Castle.

Proposed LVIA viewpoint 2 from Old Invermoriston Bridge (Category B Listed; LB15024) will also be referred to, as required and appropriate, in assessment of impacts upon Listed Buildings within Invermoriston.

Given the lack of or limited visibility of the Proposed Development from other designated heritage assets within the study area no further visualisations are proposed.

I would be grateful for your comments on the above and am happy to discuss if this would be helpful.

Best,

Vicky

**Victoria Oleksy**

**AOC Archaeology Group**

**tel:** [REDACTED]

**fax:** [REDACTED]

**mobile:** [REDACTED]

**email:** [REDACTED]

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## Highland Aviation

To: <[REDACTED]>  
From: "[REDACTED]" <[REDACTED]@highlandaviation.com>  
Subject: Wind Turbine Proposal  
Date: Tue, 25 May 2021 15:26:47 -0000

Hi Malcolm,

Further to our telephone conversation, I see no issue with the proposal. The majority of our training night flights take place in the local area with occasional excursions north and south, but rarely in the direction of Invermoriston. Our qualified Night Rated pilots tend not to venture too far from the field. It is rare night VFR minima allow us the opportunity to cross the mountains or fly down the Great Glen.

Regards



Head of Training  
Highland Aviation

## Highlands and Islands Airports Limited (HIAL)

From: [REDACTED] <[REDACTED]@hial.co.uk>  
To: Malcolm Spaven <[REDACTED]>  
Subject: RE: Bhlaraidh Extension wind farm (your ref 2019/0079/INV)  
Date: Fri, 5 Mar 2021 16:16:56 +0000

Hi Malcolm,

Oh I am sorry, I meant to come back to you.

I can confirm we are content that there is no line of sight to the Inverness PSR.

Best regards,  
[REDACTED]

[REDACTED]  
Aerodrome Operations Manager  
Highlands and Islands Airports Limited  
☎️ [REDACTED] (Direct Dial) ☎️ [REDACTED] (Mob)☎️

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

From: Malcolm Spaven <[REDACTED]>  
Sent: 05 March 2021 14:35  
To: [REDACTED] <[REDACTED]@hial.co.uk>  
Subject: RE: Bhlaraidh Extension wind farm (your ref 2019/0079/INV)

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Hi [REDACTED]

Further to our exchanges in January, I am now in the process of writing the EIA Report aviation chapter for the Bhlaraidh Extension wind farm and wonder if you have had time to review the line of sight data for the Inverness PSR, which I sent through on 14th January?

Let me know if you require any further information.

Best regards

Malcolm



## Joint Radio Company (JRC)

## Sarah Tullie

---

**From:** JRC Windfarm Coordinations [REDACTED] >  
**Sent:** 16 April 2021 13:00  
**To:** Sarah Tullie  
**Subject:** Consultation on Bhlaraidh Wind Farm Extension [WF716101]

Dear Sarah,

A Windfarms Team member has replied to your co-ordination request, reference **WF716101** with the following response:

*Dear Sarah*

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

**Site Centre/Turbine at NGR/IGR:**

*Details of the individual turbines are given in the table below:*

| <u>Turbine</u> | <u>Easting</u> | <u>Northing</u> | <u>Max Tip Height (m)</u> | <u>Max Rotor Diameter (m)</u> |
|----------------|----------------|-----------------|---------------------------|-------------------------------|
| T01            | 238385         | 821688          | 180                       | 158                           |
| T02            | 238364         | 821034          | 180                       | 158                           |
| T03            | 238925         | 821693          | 180                       | 158                           |
| T04            | 239380         | 821326          | 180                       | 158                           |
| T05            | 239523         | 822070          | 180                       | 158                           |
| T06            | 238277         | 822170          | 180                       | 158                           |
| T07            | 238704         | 820694          | 180                       | 158                           |
| T08            | 238771         | 820273          | 180                       | 158                           |
| T09            | 239348         | 820077          | 180                       | 158                           |
| T10            | 239501         | 820920          | 180                       | 158                           |
| T11            | 238876         | 821220          | 180                       | 158                           |
| T12            | 239955         | 821460          | 180                       | 158                           |
| T13            | 240789         | 821549          | 180                       | 158                           |
| T14            | 240252         | 820478          | 180                       | 158                           |
| T15            | 239933         | 820784          | 180                       | 158                           |
| T16            | 239852         | 820120          | 180                       | 158                           |
| T17            | 240372         | 821198          | 180                       | 158                           |
| T18            | 240876         | 821077          | 180                       | 158                           |

**Development Radius:** 1.5KM

*This proposal **cleared** with respect to radio link infrastructure operated by:*

**The Local Utility Company**

*JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.*

*In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly*

*the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.*

*In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.*

*It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.*

*Regards*

*Wind Farm Team*

*Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom*

*Office:* [REDACTED]

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We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xngeaaacnlmaaaM%2Fk9MK0KEJ8o4Q%3D%3D>

## Marine Scotland Science (MSS)

T: + [REDACTED]

DD: [REDACTED]

Mr Mark Ashton  
Energy Consents Unit  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Our ref: FL/15-7

June 8th 2020

Dear Mark,

## **BHLARAI DH WIND FARM EXTENSION, INVERMORISTON**

Marine Scotland Science (MSS) received correspondence from Dr Jon Watt who is advising SSE in relation to fish surveys for the proposed Bhlaraiddh wind farm extension.

MSS welcomes the approach of Dr Watt that the existing fish data, which are out of date and do not include all the watercourses within the proposed development area, should be considered inadequate for the purposes of the Environmental Impact Assessment (EIA) and that additional fish data should be collected which are specific to the proposed development. A fish habitat survey will be carried out within the Allt Saigh catchment, which drains most of the proposed development area, to determine appropriate mitigation measures and the location of electrofishing survey sites. Dr Watt states that the only substantial stream in the part of the River Moriston catchment, which also lies within the boundary of the proposed development area, is unlikely to support fish populations due to low water levels as a result of abstraction.

MSS welcomes the proposal of a fish monitoring programme which will be informed by the findings of the electrofishing and habitat surveys. We recommend that an integrated water quality and fish population monitoring programme is established which follows MSS guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout->

[Coarse/Freshwater/Research/onshoreren](#)) and provides full details regarding the methodology, parameters measured, data analysis, reporting and a map outlining the proposed electrofishing sites (including control sites) along with the proposed location of the turbines and associated infrastructure. We also recommend that regular visual inspections of all watercourses are carried out by an appointed Ecological Clerk of Works as outlined in the above guidelines.

MSS notes that the initial electrofishing surveys, carried out to inform the EIA, will be semi-quantitative. MSS recommends that fully quantitative surveys are conducted for monitoring purposes, to allow a more accurate comparison of fish densities before construction, during construction and after construction and a comparison of fish densities between sites which could potentially be impacted from the proposed development and control sites, sites which are unlikely to be impacted.

The results of the proposed surveys should be presented in the EIA report along with the proposed mitigation measures and details of the proposed water quality and fish population monitoring programme.

Kind regards,

Dr Emily E. Bridcut

## Sarah Tullie

---

**From:** Jon Watt [REDACTED]  
**Sent:** 01 June 2020 09:57  
**To:** Emily Bridcut  
**Cc:** Roy Ferguson; Craig Cunningham; Carolyn Wilson  
**Subject:** Fw: Bhlaraidh wind farm extension

**Categories:** Bhlaraidh

Good morning Emily

Chris at the Ness District Salmon Fishery Board sent us a response in relation to Bhlaraidh Wind Farm Extension. It is copied below for information and makes some useful observations in relation to any future monitoring programme should the development proceed.

Let me know if you/MSS have any questions or need any additional information.

Thanks and best wishes  
Jon

Dr Jon Watt  
Waterside Ecology  
Druimindarroch, Arisaig, Inverness-shire, PH39 4NR  
T: [REDACTED] M: [REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, May 20, 2020 12:05 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh wind farm extension

Hi John

Many thank for consulting me - I can confirm that we are happy with the comprehensive fish survey specification for the EIAR/Environmental Statement.

Looking ahead to post consent monitoring, it would be advisable to include an additional survey site further down the Allt Saigh at its confluence with Loch Ness. We suspect that the accessible reaches in this area may be utilised by spawning salmon and ferox trout. Likewise, an addition site on the River Moriston would be advisable given its importance for salmon and freshwater pearl mussel.

Hope this makes sense.

All the best

Chris

---

**From:** Jon Watt [REDACTED]  
**Sent:** 20 May 2020 09:14  
**To:** Chris Conroy [REDACTED]  
**Cc:** [REDACTED]

[REDACTED]  
**Subject:** Bhlaraidh wind farm extension

To: Chris Conroy, Director, /Ness & Beaully Fisheries Trust

Re: Bhlaraidh Wind Farm, proposed extension

Chris

You will be aware of the proposed extension to the Bhlaraidh Wind Farm, near Invermoriston. A turbine layout is included as an Appendix in the attached document and further details can be found at the Energy Consent Unit website.

SSE and the lead consultant, ITP Energised, have asked Waterside Ecology to prepare a fish survey specification for the site. The survey would be conducted to provide information on fish in support of the Environmental Impact Assessment Report for the site.

A proposed survey design is attached. Marine Scotland Science has requested that the developer contact the local Fishery Board and Trust to ensure that any fish survey best reflects local knowledge and the needs of local fishery management organisations. I'd be very grateful, therefore, if you could cast an eye over the attached and let me know whether:

- a) It is likely to satisfy the Board's/Trust's expectations in relation to fish data for the EIAR/Environmental Statement for the Bhlaraidh the site; and
- b) The Board and Trust consider that any changes or additions are required to the proposed specification.

The rationale behind the proposal is set out in the attached, but if anything is unclear or you'd like to talk it over, feel free to give me a ring.

Thanks and best wishes  
Jon

Dr Jon Watt  
Waterside Ecology  
Druimindarroch, Arisaig, Inverness-shire, PH39 4NR  
T: [REDACTED] M: [REDACTED]



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## Nature Scot / Scottish Natural Heritage (SNH)

**Sarah Tullie**

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**From:** [REDACTED]  
**Sent:** 08 July 2021 18:47  
**To:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Evening all,

Many thanks for all responses. Just to follow up, I discussed this with Stephen McFadden on our Gatecheck 2 call yesterday and I can confirm that SSE would be content with the condition as described by ECU and that we will not be completing the visible lighting assessment within the EIAR.

Kind regards,  
Jane.

**Jane MacDonald** CEnv MIEMA || Consent Manager

**SSE Renewables**  
1 Waterloo Street  
Glasgow, G2 6AY

[REDACTED]  
[REDACTED]

[saserenewables.com](https://saserenewables.com)

Please note that I don't normally work on Fridays.



---

**From:** [REDACTED]  
**Sent:** 05 July 2021 13:13  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

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Good afternoon Matt

Thanks for your email below. It's my opinion that any such condition would be worded, with regards to any lighting, that it would only be the infrared lighting which has CAA agreement that would be conditioned. That is, we wouldn't state explicitly that there would no visible lighting permitted.

Happy to discuss.

Regards

Stephen

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

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**From:** [REDACTED]

**Sent:** 05 July 2021 12:23

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Good morning,

Thank you for sending us the CAA consultation response which looks like very positive news and we appreciate the efforts made to avoid the need for visible aviation lighting.

Would SSER be willing to accept a condition to any consent that would prevent installation of any visible lighting?

Stephen, would ECU be able to apply the condition?

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

**NatureScot** | Silvan House, 231 Corstorphine Road, Edinburgh EH12 7AT | [REDACTED]

NatureScot, Taigh Silvan, 231 Rathad Chros Thoirphin, Dùn Èideann EH12 7AT | [REDACTED]

[nature.scot](http://nature.scot) | [@nature\\_scot](mailto:@nature_scot) | Scotland's Nature Agency | Buidheann Nàdair na h-Alba

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**From:** Simon Hindson (Planning and Environment) [REDACTED]

**Sent:** 05 July 2021 08:09

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Good Morning Jane,

If it is confirmed within the EIA that no lighting is required and the reasons for that (i.e. the CAA response and the inclusion of infrared lighting), then I would be content for no lighting assessment to be included in the LVIA. I would suggest that this is set out in the description of development chapter, the LVIA chapter and any chapter containing aviation assessments. However, emerging guidance from NatureScot would prevail (particularly in relation to any impacts on receptors in the WLA), therefore I would recommend that you await Matt's comments and any from the ECU, prior to progressing.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** [REDACTED]  
**Sent:** 01 July 2021 16:41  
**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

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Dear Matt and Simon,

We have received the attached consultation response from the Civil Aviation Authority (CAA). The response confirms the following for the Bhlaraidh Wind Farm Extension site:

- No visible obstacle lights on the Bhlaraidh Extension wind farm turbines
- infra-red lights to MoD specification installed on the nacelles of perimeter turbines: Turbines 2, 5, 7, 13, 18, 28 and 31.

As there is to be no visible lighting, please can you confirm that you are in agreement that a lighting assessment is no longer required for this EIA?

Kind regards,  
Jane.

**Jane MacDonald** cEnv MIEMA || Consent Manager

**SSE Renewables**  
1 Waterloo Street  
Glasgow, G2 6AY

[REDACTED]

Please note that I don't normally work on Fridays.



---

**From:** [REDACTED]

**Sent:** 14 May 2021 16:18

**To:** [REDACTED]

**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

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Dear Jane,

Thank you for your email below. I think it might be helpful to clarify a couple of points. I also understand following a recent meeting SSE were reconsidering if undertaking the night time photography might be possible in a way that satisfied any health and safety concerns. We haven't yet had an update on this.

To be clear on our part, an accurate representation of the night time baseline is essential to understand how these nationally important landscapes could be affected by the proposed wind farm. As we described in our scoping response in 2019 these effects could be of national interest and should be properly assessed. It is also a fundamental part of the EIA process and the EIA Regs require that an accurate description of the baseline is provided before a project can be determined.

You are correct in that we do have experience of images that have been produced from manipulated daytime photographs. Our experience of these is they are simply not fit for purpose and they can be a misleading and inaccurate representation which does not reflect the reality of the night time baseline. The absence of existing lights in the baseline which can form key focal points and features in view is fundamental to understand how the wind farm could interact with these elements. We therefore do not believe an assessment can be made based on a daytime photograph by an assessor who has not seen nor has an accurate representation of the baseline at night. This is particularly pertinent for locations such as the viewpoint we are discussing where long range views exist. We therefore require night time photography in accordance with guidance in order to provide our advice to Government on these nationally important landscapes.

We fully appreciate there are health and safety issues that have to be carefully managed and those undertaking this work must have the appropriate skills, experience and equipment. We are however struggling to understand your view that this work could not be undertaken safely by anyone regardless of their skills including professional mountain guides who undertake this kind of work professionally and routinely.

Assuming a site specific risk assessment for this work has been undertaken, it would be helpful if you could share specifically what the risks are you feel can't be mitigated and how these differ from other elements of EIA work. For example:

- Is it the risk of tripping in the dark the concern? And how would that risk differ from an ecological surveyor that needs to be in position on a remote moor an hour before sunrise? While we appreciate they are not at height they often have a long walk in the dark over terrain which is much more challenging than a well-worn path down a popular hill.
- You have also mentioned that the physical challenge is a concern. How does your risk assessment consider this to be any different from visiting the same location during the day, the distance travelled etc. would be same?
- Is getting lost in the main concern? Having appropriate navigational skills would be a requirement or someone accompanying that could assist such as a mountain guide. You have indicated that you don't think this could be done safely with a guide, what is it specifically that you don't think a guide could do safely?

We also suggest that you talk to other developers to see what protocols they've developed to undertake this work safely. Many have undertaken this work successfully and we would be happy to put you in contact. Developers which have done this kind of work include Scottish Power, Coriolis, Community Wind Power, Force9, RES, amongst others.

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

**NatureScot** | Silvan House, 231 Corstorphine Road, Edinburgh EH12 7AT | [REDACTED]

NatureScot, Taigh Silvan, 231 Rathad Chros Thoirphin, Dùn Èideann EH12 7AT | [REDACTED]

[nature.scot](http://nature.scot) | [@nature\\_scot](mailto:@nature_scot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

---

**From:** Macdonald, Jane [REDACTED]

**Sent:** 19 April 2021 09:20

**To:** Matt Burnett [REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Matt and Simon,

Following the email thread below and attached, and a follow up phone call between myself and Matt Burnett on 29th March 2021, I am writing to confirm our position on Nature Scot's request for night time photography from the summit of Toll Creagach (VP21).

We have consulted with our H&S advisors and where a task has an identified objectionable risk, they have advised applying the principles of the "hierarchy of controls" and "prevention through design" when assessing whether we could accept a Risk Assessment and Method Statement (RAMS) for this task. Applying these principles of risk mitigation, the first and foremost consideration would be to eliminate the risk and not ascend/descend the munro in darkness. Unfortunately we cannot concur with Nature Scot's suggestion that further administrative controls or PPE (e.g. employing a safety buddy/mountain guide as suggested by Matt Burnett) would remove the hazards to an acceptable level as these controls would only mitigate the risks to a degree.

Given that there is a precedent whereby images have previously been digitally altered to show the same/similar outcome on other sites, and this has been accepted by Nature Scot, we feel that it is not essential and therefore it would be difficult to justify intentionally placing persons at risk by sending them into a potentially hazardous situation. On this basis SSE would be unable to accept RAMS from a contractor for this task. Our concerns on this have also been iterated by our consultants who have provided us with a detailed response with regards to safety

concerns, including identification of potential technical and physical challenges associated with undertaking photography for remote/ hilltop night visualisations.

In conclusion, and on the advice of our Landscape consultants, ASH, we have taken the decision to proceed with the lighting assessment using a digitally manipulated photo for VP21. We believe that this is the only safe and suitable solution and that it will present a fair representation of the worst case baseline scenario in terms of the lighting assessment. The method of assessment will be described in detail in the EIAR.

In relation to the other proposed VPs requested for dark hours assessment, we are assuming that both Nature Scot and The Highland Council are satisfied with the compromised / alternative locations put forward by ASH (as per attached consultation email).

Kind regards,  
Jane.

**Jane MacDonald** CEnv MIEMA || Consent Manager

**SSE Renewables**  
1 Waterloo Street  
Glasgow, G2 6AY



[saserenewables.com](http://saserenewables.com)

Please note that I don't normally work on Fridays.



---

**From:** Macdonald, Jane  
**Sent:** 25 March 2021 16:04  
**To:** [REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Matt and Simon,

Just wondering if you would like to have any further discussion on the alternative assessment approach suggested for dark hours visualisation at VP21? I'm happy to set up a call on this so please just let me know.

ASH are currently preparing for a site visit to complete the required photography at other viewpoints and, as they have suggested some alternatives to some of the other viewpoints requested between THC and NS, we would be keen to have a response from you both to enable them to plan the site visit as soon as possible. I've attached their consultation for ease of reference.

Kind regards,

Jane.

---

**From:** Macdonald, Jane  
**Sent:** 19 March 2021 12:19  
**To:** [REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Matt and Simon,

ASH are currently preparing a combined response to both Nature Scot and THC on the selection of VPs to be included in the turbine lighting assessment.

Ideally, we would like to have a call separately regarding NatureScot's request for the baseline lighting photograph for VP 21 to be taken during hours of darkness. SSE are just not able to justify this task from a Health and Safety perspective, but also planning any site visits which require either overnight accommodation, or even somewhere warm for day time rest and recovery at present is difficult with current covid restrictions. ASH are proposing that in this instance, and for this VP, an acceptable alternative would be to use a manipulated daylight photo and we would hope to seek agreement from Nature Scot that this is would be acceptable.

I think it would be very useful to have an open discussion on this, so we can all present our reasonings and perhaps discuss the merits of the proposed alternative assessment approach in more detail. If you are available, please can you propose any times / dates which suit next week and I can send out a Teams meeting invite?

Kind regards  
Jane.

**Jane MacDonald** CEnv MIEMA || Consent Manager

**SSE Renewables**  
1 Waterloo Street  
Glasgow, G2 6AY

[REDACTED]

[saserenewables.com](https://saserenewables.com)



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**From:** Matt Burnett [REDACTED]  
**Sent:** 12 March 2021 14:07  
**To:** [REDACTED]



[REDACTED]  
**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

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

---

Dear Nicola,

Thank you for the consultations on the Bhlaraidh Extension LVIA and CLVIA.

With regards to the night time visualisation we agree that Toll Creagach is an important viewpoint to include given it will represent effects on a landscape of national importance due to its location in both the Glen Affric National Scenic Area and the Central Highlands Wild Land Area.

It is important this night time visualisation accurately represents the baseline as seen in reality and it is therefore not appropriate to use a manipulated photograph taken in during the day. The photography should be taken either in accordance with our guidance, that is around 30 minutes after official sunset or 30 minutes before official sunrise.

We appreciate obtaining the photography for this location is challenging and appropriate health and safety precautions need to be in place, however as has been demonstrated by several other applications it is entirely achievable. Given the importance of these landscapes this photomontage will be necessary to inform our response on the National Scenic Area and Wild Land Area.

Toll Creagach being one of many summits on a popular high level route, often involving high camps, in the NSA and WLA is a good compromise as it is representative of the route but the most easily accessible of the group.

With regards to cumulative assessment, in the event that Loch Liath Wind Farm application is summited ahead of Bhlaraidh Ext. it should be included as a key consideration in the CLVIA as the design compatibility for both developments will be an important issue.

I hope that helps,

Many thanks

Matt

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 08 March 2021 12:03

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Matt,

For your information, please see correspondence with Simon of THC below. We look forward to receiving your consultation response and will respond to both responses together.

For reference, the ZTV plans are available as high resolution versions if required, but these had been reduced in size for upload to the THC eplanning portal (19/03373/SCOP; online reference 100362803-001). The other figure that Simon refers to (Figure 8.1) shows the tip height ZTV for an earlier layout iteration, submitted at Scoping, and has therefore now been superseded by the most recent tip and hub ZTV figures for SSE Design Layout 04D (119009-D-VPC4-2.0.0 and 119009-D-LC1-2.0.0).

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]

**Sent:** 01 March 2021 22:14

**To:** [REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Roy / Nicola,

Further to your emails below and the uploading of information on to the case file I have now had the opportunity to review the submitted information with our landscape architect.

Firstly and in relation to the Study area, I feel that a robust assessment for the full 45km study area will be required given the scale of the turbines proposed within the development. I would not be in a position to support the screening in or out of viewpoints based upon distance.

In relation to Wild Land, I would recommend that you scope this with NatureScot and then advise us of their position.

Our landscape architect has reviewed in detail the approach to the visible lighting assessment and advises that with turbines proposed at 180m to blade tip, the requirement for Aviation Lighting becomes an important consideration in potential impacts on Landscape Character and Visual Impact, particularly where it influences perception of existing sense of place or perception of wildness or remoteness.

Lighting is likely to be visible from over half of the proposed viewpoint locations,. The development's location close to the Loch Ness and Duntelchaig Special Landscape Area as well as to Inverness, places it at a nexus where the sensitivities of tourism visitors and local residents traveling experience coincide, as such an increase in the number of Dark Hours visualisations from the proposed three is appropriate

Nacelle mounted aviation lights can reflect off the blades as they move through the upper part of their rotation, therefore it isn't necessarily enough to assess impacts only in viewpoints where hubs themselves are visible. The Consultation ZTV for Lighting shows potential exposure to hubs only. With this in mind, and looking at the earlier ZTV with Proposed Viewpoints Figure 8.1, a viewpoint on the A82 southbound overlooking Urquhart Bay should be added and include full Dark Hours visualisations. Duplication of the viewpoint close to Temple Pier identified in Loch Liath Scoping at A82/Great Glen Way, Urquhart Bay 252972, 830032 is likely to be particularly useful

Dark Hours visualisations should also be completed for Viewpoints 7, 10 and 26.

In relation to the viewpoints, having reviewed the wireframe viewpoint images and ZTV mapping we note that the electronic ZTV's for Viewpoint and Lighting Consultation, which show the ZTV for 'SSE Design Layout 04D a' are fairly low resolution, which necessarily limits the amount of information to be gleaned from them. The earlier ZTV with Proposed Viewpoints Figure 8.1 is of higher resolution but it isn't entirely clear if the differences in extent of visibility are due to further design iteration or if 8.1 shows visibility to blade tip. With that said I support the scope of viewpoints proposed.

I trust the above response is useful. If you have any further matters you wish to discuss in relation to this proposed development, please do not hesitate to contact me.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** Roy Ferguson [REDACTED]  
**Sent:** 11 February 2021 08:47  
**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Simon

Following on from your email correspondence with Nicola Sukatorn (below), I can confirm that I have upload the documents to eplanning as post submission additional information using the reference number 19/03373/SCOP. The online reference is 100362803-001.

Regards  
Roy

---

**From:** Nicola Sukatorn  
**Sent:** 08 February 2021 18:43  
**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Many thanks Simon,

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 08 February 2021 18:37  
**To:** Nicola Sukatorn [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Nicola,

Apologies for not coming back sooner. Could you please upload via the eplanning.scot portal i.e. the Council eplanning website.

In doing so you will have to use the Post Submission Additional Documentation section of the portal and yes this would be referring to the Scoping Report rather than the planning application.

If there are any issues with uploading them to the portal please email [REDACTED] and they will be able to assist.

Kind regards,

Simon

Simon Hindson

Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]

**Sent:** 08 February 2021 17:54

**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

I appreciate you are very busy, so I just wanted to ask if you had any thoughts on my previous email, or whether you would like us to upload to ECU or the THC eplanning website? Please could you also confirm if you would still like the tag 'post submission additional information' to be used? We assume the 'submission' here refers to the Scoping Report, as opposed to the planning application.

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

---

**From:** Nicola Sukatorn

**Sent:** 02 February 2021 09:53

**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

We have looked into uploading the figures to the eplanning website, but since the Scoping application was submitted to ECU through their portal, we assume these consultation figures may need to be uploaded to ECU's portal. We appreciate that there may be a preference to keep ECU documents to final application documents. We are therefore wondering if there may be another way for us to send you the consultation figures or another location to upload them? If the eplanning website is the best way for you, we can continue looking into this.

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

---

**From:** Nicola Sukatorn

**Sent:** 28 January 2021 16:20

**To:** Simon Hindson [REDACTED]  
[REDACTED]

[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

That's no problem – we will upload the figures to the eplanning portal and let you know when they are there.

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 27 January 2021 19:48  
**To:** Nicola Sukatorn [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC) [Filed 28 Jan 2021 09:54]

Hi Nicola,

Unfortunately our security policies do not allow us to access the figures on the file sharing website.

Would you be able to upload them to eplanning as post submission additional information using the reference number 19/03373/SCOP?

Thanks,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 27 January 2021 12:58  
**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Dear Simon,

We wish to consult further with you on the LVIA for Bhlaraidh Wind Farm Extension. Please see attached letter and table.

Figures can be downloaded from this link (expires in 1 week): [REDACTED]

These include two ZTV figures (*119009-D-LC1-1.0.0 Lighting Consultation (January 2021)*); and *119009-D-VPC4-1.0.0 Viewpoint Consultation (January 2021)* ) and draft wirelines from all proposed viewpoints

Kind regards,

**Nicola Sukatorn**

---

ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL

*Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)*

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

Our Ref.: 119009-L-SNH3-1.0.0

Date : 27.01.21

ash

NatureScot  
Silvan House  
3<sup>rd</sup> Floor East  
231 Corstorphine Road  
Edinburgh  
EH12 7AT



FAO : Matt Burnett, Renewable Energy Casework Advisor

Dear Matt,

**Bhlairaidh Wind Farm Extension: LVIA Viewpoints, Study Areas, Wild Land and Visible Turbine Lighting (Further Consultation January 2021)**

***LVIA Viewpoints***

Following on from our LVIA Viewpoint consultation of June 2020<sup>1</sup>, we are writing to confirm the proposed Viewpoints (VPs) for Bhlairaidh Wind Farm Extension LVIA.

Since June 2020, some amendments have been made to the Proposed Development layout (resulting in the fixed Layout SSE DL04D for turbines of 180m tip height) and consequently some small amendments to VP locations. A list of proposed viewpoints is appended to this letter (*119009-N-VP3-1.0.0*), with a plan of the Proposed Development tip height ZTV and viewpoints (*119009-D-VPC4-1.0.0*) and a set of wirelines from each VP (*119009-D-VPC5.1-1.0.0* to *119009-D-VPC5.26-1.0.0*).

The key changes to the LVIA viewpoints are as follows:

- VP4 has been relocated to a public road north-east of Drumnadrochit to represent elevated views from several elevated properties in this area. Following field work, it was found that the previous VP4 location (A833 above Milton) was not suitable for a viewpoint as views from the public road were either screened by roadside trees or landform and there were limited options for safe stopping points for photography.
- Several VPs have been micrositied following field work.
- All other VPs in the attached document remain as they were in our June 2020 consultation, but may be subject to some micrositing when photographs are taken on site.

***Study Areas***

In the Scoping Report, it was described that a wider study area (45 km) from outer turbines would be defined as well as a 20 km detailed study area. It was proposed that the visual assessment of receptors at viewpoints and landscape assessment of Protected and Designated Landscapes be conducted within 45 km; while the visual assessment of receptors in settlement areas and on routes and landscape assessment of Landscape Character Types be conducted within the 20 km study area. This is based on the preliminary scoping assessment that has found that likely significant effects are most likely to be found within 20 km.

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<sup>1</sup> See letter *119009-L-SNH2-1.0.0*; drawing *119009-D-VPC2-1.0.0* and list of viewpoints in document *119009-N-VP2-1.0.0*.

It is understood from Scoping Responses, that THC “would seek a 45km study area, as proposed by the applicant, given the size of the turbines and we would expect that a detailed assessment of effects should be undertaken for the whole study area”.

In light of this comment, the LVIA will include a preliminary review of areas/receptors within the 45 km study area. This will identify areas/receptors to be taken forward for further detailed assessment, focussing on areas/receptors identified to have potential for significant effects. It is likely that the majority of these areas/receptors may fall within 20-25 km of the Proposed Development. This will enable a proportional assessment to be conducted, focussing on those areas/receptors where there is potential for significant effects.

### **Wild Land**

As described in the Scoping Report<sup>2</sup>, “The Proposed Development is not located within a Wild Land Area (WLA) but has the potential to indirectly affect wild land due to potential intervisibility with turbines from WLAs. However, it is likely that the extent of this intervisibility would be largely limited to areas already affected by the Operational Development. ... It is proposed that an assessment of effects on WLAs will form a part of the main LVIA chapter rather than a stand-alone report.”

Further to this, and having now considered the ZTV for the amended layout for the Proposed Development (see 119009-D-VPC4-1.0.0), we plan to focus on assessing how the landscape effects of the Proposed Development may alter the wildness attributes of WLA 24 (Central Highlands) and WLA 19 (Braeroy-Glenshirra-Creag Meagaidh). These WLAs are located approximately 10 km and 17 km from the closest Proposed Development turbines respectively and given their distance, it is proposed that the assessment of WLAs will be covered as part of the LVIA rather than in a stand-alone WLA Assessment. The assessment will assess effects on the key qualities of the WLA as well as the defined physical and perceptual attributes. The method of assessment will follow the principles of the latest NatureScot (2020)<sup>3</sup> WLA assessment guidance.

We plan to scope the remaining six WLAs<sup>4</sup> within the 45 km study area out of this assessment due to the limited potential for significant effects on the wild land qualities of these areas. For these WLAs, we consider that the lack of ZTV coverage or effects of distance and context would limit potential for significant effects.

### **Visible Turbine Lighting**

Given requirements of the CAA Policy Statement<sup>5</sup> for wind turbines “at or in excess of 150 m Above Ground Level” (AGL), it is assumed that visible turbine lights may be required for the Proposed Development. Options for lighting mitigation are currently being explored and consultation is underway with the CAA. However, in the absence of an agreed strategy, we will assess visible turbine lighting effects for the ‘worst-case’ scenario for LVIA, whereby:

- Each Proposed Development turbine would have a steady 2,000 candela red light fitted to the top of the nacelle / turbine hub (assumed to be at 105 m AGL), visible in all directions. These lights may frequently drop to an intensity of 200 candela, when meteorological visibility exceeds 5km. However, for purposes of the assessment, we will assess the worst-case of 2000 candela;

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<sup>2</sup> Paragraph 8.4.7 of SSE (2019) **Bhlaraidh Wind Farm Extension EIA Scoping Report**. July 2019.

<sup>3</sup> NatureScot (2020) **Assessing Impacts on Wild Land Areas: Technical guidance**. Published September 2020. Available at: <https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance> [Accessed 21.01.21]

<sup>4</sup> WLA 14 (Rannoch-Nevis-Mamores-Alder), WLA 15 (Cairngorms), WLA 18 (Kinlochhourne-Knoidart-Morar), WLA 20 (Monadhliath), WLA 28 (Fisherfield-Letterewe-Fannich) and WLA 29 (Rhiddoroch-Beinn Dearg-Ben Wyvis).

<sup>5</sup> Civil Aviation Authority (2017) **Policy Statement. Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150m Above Ground Level**. Available at: [https://publicapps.caa.co.uk/docs/33/DAP01062017\\_LightingWindTurbinesOnshoreAbove150mAGL.pdf](https://publicapps.caa.co.uk/docs/33/DAP01062017_LightingWindTurbinesOnshoreAbove150mAGL.pdf) [Accessed 21.01.21]

- Each Proposed Development turbine would have steady 32 candela red lights fitted halfway up the tower (assumed to be at 57.5 m AGL), arranged such that they are visible in all directions; and
- Lights would be switched on at 30 minutes after official sunset and off 30 minutes before official sunrise.

A plan of the Proposed Development hub height ZTV and viewpoints (*119009-D-VPC4-1.0.0*) is appended to this letter and illustrates the maximum extent of theoretical visibility of the 2,000 candela lights, situated on the hubs of each turbine.

### *Scope*

In accordance with the NatureScot (2020)<sup>6</sup> guidance, the assessment will consider effects on visual receptors at all VPs as well as other relevant visual receptors (in settlements and on routes), with a focus on those where significant effects are most likely.

The assessment will also consider effects on landscape character types (LCTs) and landscape designations/constraints, with a focus on those where significant effects are most likely. We propose to assess the following protected and designated landscapes:

- Glen Affric NSA;
- Loch Ness and Duntelchaig SLA;
- WLA 19 (Braeroy-Glenshirra-Creag Meagaidh); and
- WLA 24 (Central Highlands).

### *Figures*

A version of the hub height ZTV figure (see *119009-D-VPC4-1.0.0*) will be included in the LVIA to illustrate the maximum extent of hub light theoretical visibility. This figure will be accompanied by annotated wirelines illustrating light locations from all VPs (where turbine lights are theoretically visible), produced to NatureScot standards.

We propose to also include photomontages of the visible turbine lighting from 3 VPs to represent a variety of views, both low-level and elevated in different parts of the study area:

- VP 5 – Suidhe Viewpoint, B862. A photomontage from this location would illustrate potential lighting effects on receptors south-south-east of the Proposed Development travelling along the B862 and stopping at this popular roadside viewpoint, which is within the Loch Ness and Duntelchaig SLA, where 18 hub lights would theoretically be visible.
- VP 21 – Toll Creagach. Given the location of this munro top VP, we will manipulate a photograph taken during daylight. Although there may be some baseline lighting visible from this location, we will assume the worst-case scenario of full darkness. This location is chosen over VPs 11 or 12 (both suggested by NatureScot at Scoping) since the ZTV shows that more hub height lights would theoretically be visible from VP 21. A photomontage from this location would illustrate potential lighting effects on an elevated and remote location in WLA 24 (Central Highlands), on the edge of the Glen Affric NSA and Strathconon, Monar and Mullardoch SLA, to the north-west of the Proposed Development, where 16 hub lights would theoretically be visible.
- VP 17 – B862 south of Dores. A photomontage from this location would illustrate views from the north-east of the Development, from an elevated roadside location with views across Loch Ness within the Loch Ness and Duntelchaig SLA, where 4 hub lights would theoretically be visible.

This letter is being sent to NatureScot, The Highland Council and Energy Consents Unit.

<sup>6</sup> NatureScot (2020) **General pre-application and scoping advice for onshore wind farms. Guidance**. Published September 2020. Available at: <https://www.nature.scot/general-pre-application-and-scoping-advice-onshore-wind-farms> [Accessed 21.01.21]

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

Kind regards,



**Jennifer Skrynka**  
Managing Director

Cc: Craig Cunningham and Jane MacDonald (SSE Renewables); Roy Ferguson (ITPE); Simon Hindson (THC);  
Stephen McFadden (ECU)

### Proposed Viewpoints (January 2021)

January 2021 changes are noted in blue.

Table to be read in conjunction with drawing [119009-D-VP4](#). This table and list of Viewpoints (VPs) relates to the layout [SSE DL04D](#).

#### Proposed Viewpoint List

| VP No.                             |                                     |                                      |                            |                                 | Location                    | OS Grid Reference                             | Reason for Selection / Exclusion   |
|------------------------------------|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|-----------------------------|---|--|
| Further VP Consultation (Jan 2021) | Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                             |   |  |
|                                    |                                     |                                      |                            |                                 |                             | *Microsited Jan 2021<br>** Relocated Jan 2021 |  |
| VP 1                               | VP 1                                | VP 1                                 | VP 1                       | VP 1                            | Track to Loch Liath         | 235061, 818397 *                              | Illustrative of open, very close-proximity view, from track on the site.   |
| VP 2                               | VP 2                                | VP 2                                 | VP 2                       | Near to VP 2                    | Old Bridge, Invermoriston   | 241975, 816565 *                              | Representative of close-proximity views from Invermoriston, taken from Old Bridge.   |
| VP 3                               | VP 3                                | VP 3                                 | VP 3                       | VP 3                            | Meall Fuar-mhonaidh         | 245685, 822183                                | Illustrative of elevated views from popular local hill summit on the north-western side of Loch Ness, within Loch Ness and Duntelchaig SLA.  |
| -                                  | VP 4                                | VP 4                                 | VP 4                       | -                               | A833 above Milton           | 249836, 832259                                | <a href="#">Excluded and relocated</a> after site visit to new VP4 location, due to very limited visibility (in particular from roadside tree screening) and lack of safe stopping location for photography on public road. No suitable alternative location found on A833. Originally chosen to be illustrative of new visibility, representative of elevated views from the A833 above Milton. [Requested in PAAP from A833 above Milton.] |
| VP4                                | -                                   | -                                    | -                          | -                               | Achbuie Road near Creag Nay | 252149, 830624**                              | Illustrative of new visibility, representative of elevated views from public road and several elevated properties above Drumnadrochit. [In general vicinity of location requested in PAAP, which was from A833 above Milton.]  |

| VP No.                             |                                     |                                      |                            |                                  | Location                         | OS Grid Reference                             | Reason for Selection / Exclusion  |
|------------------------------------|-------------------------------------|--------------------------------------|----------------------------|----------------------------------|----------------------------------|---|---|
| Further VP Consultation (Jan 2021) | Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlairaidh Wind Farm LVIA (2012) |                                  | *Microsited Jan 2021<br>** Relocated Jan 2021 |   |
| VP 5                               | VP 5                                | VP 5a                                | VP 5                       | VP 5                             | Suidhe Viewpoint, B862           | 244964, 810542 *                              | Illustrative of elevated view from roadside Viewpoint marked on OS maps, on General Wade's military road, within Loch Ness and Duntelchaig SLA.   |
| VP 6                               | VP 6                                | VP 5b (THC5)                         | -                          | -                                | Summit by Suidhe Viewpoint, B862 | 244261, 810355 *                              | Illustrative of elevated view from popular summit near Suidhe Viewpoint carpark. <i>[Requested by THC in their Scoping Response.]</i>   |
| VP 7                               | VP 7                                | VP 6                                 | VP 6                       | VP 6                             | B862 south of Foyers             | 249743, 817317 *                              | Illustrative of views from the B862 road opposite the site.   |
| VP 8                               | VP 8                                | VP 7                                 | VP 7                       | Near to VP 7                     | Lochside picnic layby on B852    | 258077, 832133 *                              | Illustrative of worst-case low-level views from shores of Loch Ness, on B-road, within Loch Ness and Duntelchaig SLA.   |
| -                                  | -                                   | VP 8                                 | VP 8                       | -                                | Path north of Loch Affric        | 214824, 822851                                | <u>Excluded</u> due to removal of theoretical visibility here and along core path by Loch Affric. Originally this was chosen to be illustrative of views from core path to the north of Loch Affric, at junction with mountain track, situated within Glen Affric NSA and Central Highlands WLA. <i>[Requested in PAAP to illustrate views from route along north side of Loch Affric within NSA]</i> |
| VP 9                               | VP 9                                | VP 9                                 | VP 9                       | VP 9                             | Carn na Saobhaidhe               | 259930, 814395                                | Illustrative of elevated views from popular corbett summit on southern side of Loch Ness.   |
| VP 10                              | VP 10                               | VP 10                                | VP 10                      | VP 10                            | Great Glen Way                   | 256110, 839075 *                              | Illustrative of elevated views from the Great Glen Way.   |
| VP 11                              | VP 11                               | VP 11                                | VP 11                      | VP 11                            | Meall Mor, Glen Affric           | 224901, 828054 *                              | Illustrative of elevated views from local high point within Central Highlands WLA, on northern boundary of the Glen Affric NSA and southern boundary of the Monar and Mullardoch SLA.   |

| VP No.                             |                                     |                                      |                            |                                 | Location                     | OS Grid Reference                             | Reason for Selection / Exclusion   |
|------------------------------------|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|------------------------------|---|--|
| Further VP Consultation (Jan 2021) | Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                              | *Microsited Jan 2021<br>** Relocated Jan 2021 |  |
| VP 12                              | VP 12                               | VP 12                                | VP 12                      | VP 12                           | Creag Dhubh                  | 222752, 821610 *                              | Illustrative of elevated view from hilltop within WLA, with views north across Glen Affric NSA.  |
| -                                  | -                                   | -                                    | VP 13                      | Near to VP 13                   | Carn Ghluasaid               | 214586, 812511                                | <u>Excluded and relocated</u> after Scoping comments from SNH to new VP13/ SNH1 location. Original location was illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA.       |
| VP 13                              | VP 13                               | VP 13 / SNH1                         | -                          | -                               | Sgurr nan Conbhrairean       | 212993, 813884 *                              | Illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA; and on the edge of the Glen Affric NSA. <i>[Requested by SNH in their Scoping Response instead of Scoping VP 13.]</i> |
| VP 14                              | VP 14                               | VP 14                                | VP 14                      | VP 14                           | Meall Dubh                   | 224543, 807880 *                              | Illustrative of elevated view from corbett path, by Millenium Wind Farm.   |
| VP 15                              | VP 15                               | VP 15                                | VP 15                      | VP 15                           | Poll-gormack Hill            | 239054, 797974 *                              | Illustrative of elevated mid-range views from summit within Braeroy-Glenshirra-Creag Meagadh WLA, with views across the Corrieyarrick Pass.  |
| VP 16                              | VP 16                               | VP 16                                | VP 16                      | VP 16                           | Geal Charn                   | 256144, 798772                                | Illustrative of elevated views from Munro summit, on western boundary of CNP and near the boundary of the Monadhliath WLA.   |
| VP 17                              | VP 17                               | VP 17                                | VP 17                      | VP 17                           | B862 south of Dores          | 259368, 832474 *                              | Illustrative of elevated view across Loch Ness from minor B-road, within Loch Ness and Duntelchaig SLA.  |
| VP 18                              | VP 18                               | VP 18                                | VP 18                      | VP 18                           | Track near Dun Fhamhair fort | 247258, 846682                                | Illustrative of longer range views from walking route near Beauly.   |
| VP 19                              | VP 19                               | -                                    | -                          | -                               | Path north of Loch Affric    | 214812, 822923 *                              | Illustrative of worst-case low-level views from mountain track to the north of Loch Affric, near junction with core path, situated within Glen Affric NSA and Central Highlands WLA. No views from   |



| VP No.                             |                                     |                                      |                            |                                 | Location                   | OS Grid Reference                             | Reason for Selection / Exclusion  |
|------------------------------------|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|----------------------------|---|---|
| Further VP Consultation (Jan 2021) | Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                            | *Microsited Jan 2021<br>** Relocated Jan 2021 |   |
|                                    |                                     |                                      |                            |                                 |                            |   | circular Core Path around Loch Affric, but very small area of theoretical visibility on this nearby route. <i>[Close to Scoping VP 8 (now removed) and included to illustrate views from route along north side of Loch Affric within NSA, which was requested in PAAP]</i>           |
| VP 20                              | VP 20                               | SNH2                                 | -                          | -                               | Path north of Affric Lodge | 218287, 823946 *                              | Illustrative of elevated point on path north of Affric Lodge, on slopes of Am Meallan hill, within the Central Highlands WLA and Glen Affric NSA. <i>[Requested by SNH in their Scoping Response.]</i>  |
| VP 21                              | VP 21                               | SNH3                                 | -                          | -                               | Toll Creagach              | 219449, 828285 *                              | Illustrative of elevated views from a Munro on the edge of the Glen Affric NSA and Strathconon, Monar and Mullardoch SLA, within the Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i>  |
| VP 22                              | VP 22                               | SNH4                                 | -                          | -                               | Sgurr na Ruaidhe           | 228902, 842609                                | Illustrative of elevated views from a Munro within the Glen Strathfarrar group of hills and views over the Glen Strathfarrar NSA. It is also located within the Strathconon, Monar and Mullardoch SLA and Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i> |
| VP 23                              | VP 23                               | THC1                                 | -                          | -                               | An Cabar (Ben Wyvis)       | 245032, 866581                                | Illustrative of distant elevated views from hill top located in Rhiddoroch-Beinn Dearg-Ben Wyvis WLA and Ben Wyvis SLA. <i>[Requested by THC in their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development]</i>        |
| VP 24                              | VP 24                               | THC2                                 | -                          | -                               | NCN1 Between Dingwall and  | 256730, 861462 *                              | Illustrative of distant views from national cycle route in coastal location. <i>[Requested by THC in</i>  |

| VP No.                             |                                     |                                      |                            |                                 | Location             | OS Grid Reference                             | Reason for Selection / Exclusion   |
|------------------------------------|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|----------------------|---|--|
| Further VP Consultation (Jan 2021) | Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                      | *Microsited Jan 2021<br>** Relocated Jan 2021 |  |
|                                    |                                     |                                      |                            |                                 | Evanton              |   | <i>their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development.]</i> |
| VP 25                              | VP 25                               | THC3                                 | -                          | -                               | Minor road near Tore | 261234, 853906 *                              | Illustrative of distant views from rural settled area. [Requested by THC in their Scoping Response.]                               |
| VP 26                              | VP 26                               | THC4                                 | -                          | -                               | A87 Bun Loyne        | 221488, 809497 *                              | Illustrative of elevated views from layby by A road near Bun Loyne, Glen Moriston. [Requested by THC in their Scoping Response.]   |

**Sarah Tullie**

---

**From:** Wilson, Carolyn [REDACTED]  
**Sent:** 15 October 2020 15:01  
**To:** Matt Burnett  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (SNH)

Hi Matt

Further to my email below, our design freeze has now been delayed until December this year to allow us to do some further peatland condition survey work following receipt of our consultation response from NatureScot on our proposed Cloiche wind farm project and to make sure we can address any similar concerns in relation to our Bhlaraidh Extension project.

We are hoping our design layout will not change significantly, but once we have reached this point we will get back in touch with you to confirm the acceptability of the VP list and provide the wireframes at this point. We will also consult further with NatureScot on the proposed LVIA cumulative assessment, Wild Land Assessment and Aviation Lighting Assessment, prior to commencing these assessments following confirmation of our design upon completion of all site surveys.

I hope this confirms our updated position.

Kind regards

Carolyn

**Carolyn Wilson** || Consents Team Manager

**SSE Renewables**  
One Waterloo Street  
Glasgow  
G2 6AY

[REDACTED]  
[sserenewables.com](https://www.sserenewables.com)



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**From:** Matt Burnett [REDACTED]  
**Sent:** 22 July 2020 17:03  
**To:** Wilson, Carolyn [REDACTED]  
**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (SNH)

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Hi Lauren,

Many thanks for getting in touch and for providing an update.

Thanks for offering to provide wireframes once you have updated your layout, these really just need to be indicative so please don't produce anything extra on our behalf.

We are happy to look again at the VP list when it is convenient for you.

Many thanks  
Matt

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**From:** Wilson, Carolyn [REDACTED]  
**Sent:** 16 July 2020 10:47  
**To:** Matt Burnett [REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (SNH)

Hi Matt

I have taken over the consenting role at SSE Renewables for the above project. We don't have at present a full set of the wirelines from all of the viewpoints, but had been liaising with our LVIA Consultant ASH to provide these for you.

However in the interim we have realised there is a discrepancy with our northern boundary of the proposed site as indicated in our Scoping Report and subsequent consultations with stakeholders such as yourself. This has now been revised and we are currently assessing a minor layout change to accommodate this revised boundary. Once we have this confirmed I will get Nicola to reconsult with you and The Highland Council on the VP list just to ensure it is relevant to any change we make to the layout. As part of this process we could then provide you with the relevant wirelines to reflect this minor change.

I hope the above is acceptable and explains our current position and thinking on the project. We will be back in touch with a revised consultation on this as soon as we are able.

Kind regards

Carolyn

**Carolyn Wilson** || Consents Team Manager

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One Waterloo Street  
Glasgow  
G2 6AY

[REDACTED]

[sserenewables.com](https://sserenewables.com)



---

**From:** Matt Burnett [REDACTED]  
**Sent:** 01 July 2020 14:54  
**To:** nsukatorn [REDACTED]  
[REDACTED]

**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (SNH)

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Dear Nicola,

Many thanks for sending through the updated viewpoint list and ZTV.

Would it be possible to see a draft set of wirelines for the viewpoints on the list? We understand the layout is indicative and subject to change however it would still be useful to see draft wirelines at this stage if you have them.

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

Scottish Natural Heritage | Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: [REDACTED]  
Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT  
[nature.scot](https://www.nature.scot) – Connecting People and Nature in Scotland - [@nature\\_scot](https://twitter.com/nature_scot)

**\* tha seòladh puist-d ùr agam / I have a new email address – [REDACTED] \***

All SNH email addresses have changed to a new format: [REDACTED]

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**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 12 June 2020 16:14  
**To:** Matt Burnett [REDACTED]  
[REDACTED]

**Subject:** Bhlaraidh Extension - LVIA VP Consultation (June 2020) (SNH)

Dear Matt,

We wish to consult further with you regarding the LVIA Viewpoints for Bhlaraidh Wind Farm Extension, please see attached letter, drawing and table.

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

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[REDACTED]

Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)

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Thoiribh an aire airson adhbharan gnothai ch, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

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SSE plc

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Our Ref.: 119009-L-SNH2-1.0.0

Date : 12.06.20

Scottish Natural Heritage  
Silvan House  
3<sup>rd</sup> Floor East  
231 Costorphine Road  
Edinburgh  
EH12 7AT

FAO : Matt Burnett, Renewable Energy Casework Advisor

Dear Matt,

### **Bhlaraiddh Wind Farm Extension: LVIA Viewpoints (Further Consultation June 2020)**

Following on from our LVIA Viewpoint consultation of October 2019<sup>1</sup>, we are writing to confirm the proposed Viewpoints (VPs) for Bhlaraiddh Wind Farm Extension LVIA.

Since October 2019, some small amendments and clarifications have been made to the Proposed Development (reference Layout SSE DL03), and consequently to the VPs, as detailed in the attached document. A list of proposed viewpoints is appended to this letter (119009-N-VP2-1.0.0), with a viewpoint plan (119009-D-VPC2-1.0.0).

The key changes are as follows:

- As a result of the amended turbine layout for the Proposed Development, theoretical visibility has now been removed from the circular path (core path) around Loch Affric. **Scoping VP 8** was located on this path, so we propose to omit this VP from the assessment.
- Although theoretical visibility has been removed from the circular path around Loch Affric, there are some areas of theoretical visibility on hill slopes and elevated areas. Therefore, **VP 20** (Path north of Loch Affric; previously **SNH2** in post-scoping consultation) and **VP 21** (Toll Creagach; previously **SNH3** in post-scoping consultation) are included to illustrate views from elevated locations in the Glen Affric NSA.
- In the Pre-Application Advice Pack (PAAP), a VP was requested to illustrate “routes along the north side of Loch Affric and Loch Beinn A’Mheadhoin within the Glen Affric NSA”. We suggest **VP 19** is located on a mountain track (located north of the removed **Scoping VP 8**), near the junction with the core path, at approximately 214770, 823054 to illustrate the theoretical visibility from this location.
- In the October 2019 consultation, it was noted that some VPs could be excluded from the LVIA if the Proposed Development turbines were to be under 150m tip height, due to the size of study area. However, as the Proposed Development will now comprise turbines that will be over 150m to tip, we

<sup>1</sup> See letter 119009-L-SNH1-1.0.0; drawing 119009-D-VPC-1.0.0 and list of viewpoints in document 119009-N-VP-1.0.0.

confirm that the **VP 23** and **VP 24** (previously **THC1** and **THC2** in post-scoping consultation) will be included in the LVIA to illustrate distant views of the Proposed Development.

- All other VPS in the attached document remain as they were in our October 2019 consultation, but with some updated VP numbering. We have not identified any other areas of 'new' theoretical visibility occupied by the current Proposed Development (Layout SSE DL03) that would require other VPs.

This letter is being sent to Scottish Natural Heritage, The Highland Council and Energy Consents Unit.

Further consultation regarding other LVIA matters raised in your Scoping letter will be addressed separately.

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

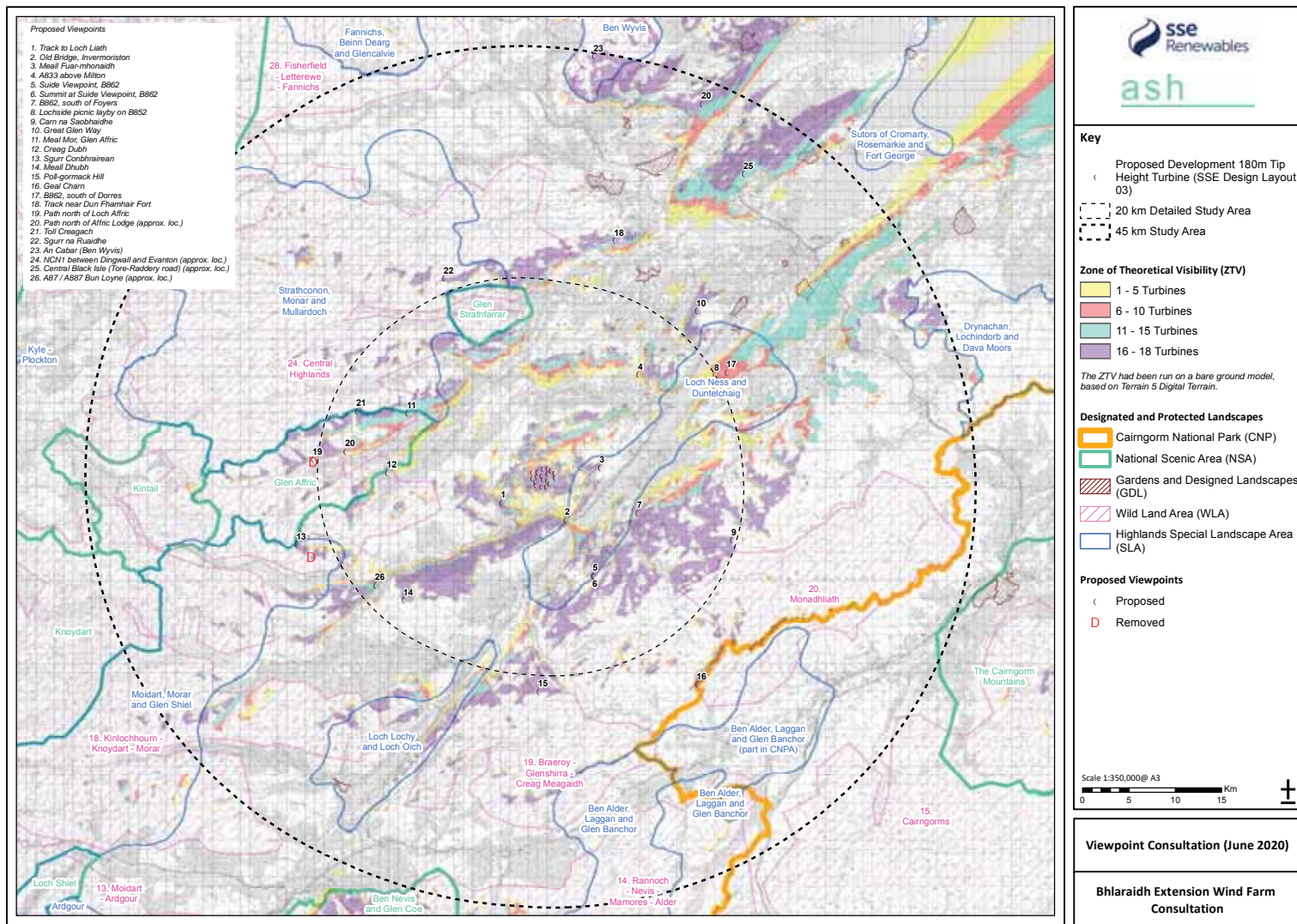
Kind regards,



**Jennifer Skrynka**  
Managing Director

Cc: Craig Cunningham and Carolyn Wilson (SSE Renewables); Roy Ferguson (ITPE); Simon Hindson (THC); Stephen McFadden (ECU)





### Proposed Viewpoints (June 2020)

Table to be read in conjunction with drawing 119009-D-VP2. This table and list of VPs relates the the layout SSE DL03.

#### Proposed Viewpoint List

| VP No.                              |                                      |                            |                                 | Location                         | OS Grid Reference | Reason for Selection / Exclusion  |
|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|----------------------------------|-------------------|---|
| Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                                  |                   |   |
| VP 1                                | VP 1                                 | VP 1                       | VP 1                            | Track to Loch Liath              | 235065, 818396    | Illustrative of open, very close-proximity view, from track on the site.  |
| VP 2                                | VP 2                                 | VP 2                       | Near to VP 2                    | Old Bridge, Invermoriston        | 241968, 816573    | Representative of close-proximity views from Invermoriston, taken from Old Bridge.  |
| VP 3                                | VP 3                                 | VP 3                       | VP 3                            | Meall Fuar-mhonaidh              | 245685, 822183    | Illustrative of elevated views from popular local hill summit on the north-western side of Loch Ness, within Loch Ness and Duntelchaig SLA.   |
| VP 4                                | VP 4                                 | VP 4                       | -                               | A833 above Milton                | 249836, 832259    | Illustrative of new visibility, representative of elevated views from the A833 above Milton. <i>[Requested in PAAP from A833 above Milton.]</i>   |
| VP 5                                | VP 5a                                | VP 5                       | VP 5                            | Suidhe Viewpoint, B862           | 244965, 810550    | Illustrative of elevated view from roadside Viewpoint marked on OS maps, on General Wade's military road, within Loch Ness and Duntelchaig SLA.   |
| VP 6                                | VP 5b (THCS)                         | -                          | -                               | Summit by Suidhe Viewpoint, B862 | tbc               | Illustrative of elevated view from popular summit near Suide Viewpoint carpark. <i>[Requested by THC in their Scoping Response.]</i>  |
| VP 7                                | VP 6                                 | VP 6                       | VP 6                            | B862 south of Foyers             | 249744, 817318    | Illustrative of views from the B862 road opposite the site.   |
| VP 8                                | VP 7                                 | VP 7                       | Near to VP 7                    | Lochside picnic layby on B852    | 258078, 832144    | Illustrative of worst-case low-level views from shores of Loch Ness, on B-road, within Loch Ness and Duntelchaig SLA.   |
| -                                   | VP 8                                 | VP 8                       | -                               | Path north of Loch Affric        | 214824, 822851    | <u>Excluded</u> due to removal of theoretical visibility here and along core path by Loch Affric. Originally this was chosen to be illustrative of views from core path to the north of Loch Affric, at junction with mountain track, situated within Glen Affric NSA and Central Highlands WLA. <i>[Requested in PAAP to illustrate views from route along north side of Loch Affric within NSA]</i> |

| VP No.                              |                                      |                            |                                 | Location                     | OS Grid Reference | Reason for Selection / Exclusion   |
|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|------------------------------|-------------------|--|
| Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                              |                   |  |
| VP 9                                | VP 9                                 | VP 9                       | VP 9                            | Carn na Saobhaidhe           | 259930, 814395    | Illustrative of elevated views from popular corbett summit on southern side of Loch Ness.  |
| VP 10                               | VP 10                                | VP 10                      | VP 10                           | Great Glen Way               | 256115, 839076    | Illustrative of elevated views from the Great Glen Way.  |
| VP 11                               | VP 11                                | VP 11                      | VP 11                           | Meall Mor, Glen Affric       | 224908, 828076    | Illustrative of elevated views from local high point within Central Highlands WLA, on northern boundary of the Glen Affric NSA and southern boundary of the Monar and Mullardoch SLA.  |
| VP 12                               | VP 12                                | VP 12                      | VP 12                           | Creag Dhubh                  | 222756, 821621    | Illustrative of elevated view from hilltop within WLA, with views north across Glen Affric NSA.  |
| -                                   | -                                    | VP 13                      | Near to VP 13                   | Carn Ghluasaid               | 214586, 812511    | <u>Excluded and relocated</u> after Scoping comments from SNH to new VP13/ SNH1 location. Original location was illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA.       |
| VP 13                               | VP 13 / SNH1                         | -                          | -                               | Sgurr nan Conbhrairean       | 212990, 813896    | Illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA; and on the edge of the Glen Affric NSA. <i>[Requested by SNH in their Scoping Response instead of Scoping VP 13.]</i> |
| VP 14                               | VP 14                                | VP 14                      | VP 14                           | Meall Dubh                   | 224539, 807889    | Illustrative of elevated view from corbett path, by Millenium Wind Farm.   |
| VP 15                               | VP 15                                | VP 15                      | VP 15                           | Poll-gormack Hill            | 239064, 798038    | Illustrative of elevated mid-range views from summit within Braeroy-Glenshirra-Creag Meagadh WLA, with views across the Corrieyarrick Pass.  |
| VP 16                               | VP 16                                | VP 16                      | VP 16                           | Geal Charn                   | 256144, 798772    | Illustrative of elevated views from Munro summit, on western boundary of CNP and near the boundary of the Monadhliath WLA.   |
| VP 17                               | VP 17                                | VP 17                      | VP 17                           | B862 south of Dores          | 259372, 832476    | Illustrative of elevated view across Loch Ness from minor B-road, within Loch Ness and Duntelchaig SLA.  |
| VP 18                               | VP 18                                | VP 18                      | VP 18                           | Track near Dun Fhamhair fort | 247258, 846682    | Illustrative of longer range views from walking route near Beauuly.  |
| VP 19                               | -                                    | -                          | -                               | Path north of Loch Affric    | 214770, 823054    | Illustrative of worst-case low-level views from mountain track to the north of Loch Affric, near junction with core path, situated within  |

| VP No.                              |                                      |                            |                                 | Location   | OS Grid Reference            | Reason for Selection / Exclusion   |
|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|--|------------------------------|--|
| Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |  |                              |  |
|                                     |                                      |                            |                                 |  |                              | Glen Affric NSA and Central Highlands WLA. No views from circular Core Path around Loch Affric, but very small area of theoretical visibility on this nearby route. <i>[Close to Scoping VP 8 (now removed) and included to illustrate views from route along north side of Loch Affric within NSA, which was requested in PAAP]</i> |
| VP 20                               | SNH2                                 | -                          | -                               | Path north of Affric Lodge (name tbc)            | 218260, 823956 (tbc on site) | Illustrative of elevated point on path north of Affric Lodge, on slopes of Am Meallan hill, within the Central Highlands WLA and Glen Affric NSA. <i>[Requested by SNH in their Scoping Response.]</i>   |
| VP 21                               | SNH3                                 | -                          | -                               | Toll Creagach                                    | 219454, 828289               | Illustrative of elevated views from a Munro on the edge of the Glen Affric NSA and Strathconon, Monar and Mullardoch, within the Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i>   |
| VP 22                               | SNH4                                 | -                          | -                               | Sgurr na Ruaidhe                                 | 228902, 842609               | Illustrative of elevated views from a Munro within the Glen Strathfarrar group of hills and views over the Glen Strathfarrar NSA. It is also located within the Strathconon, Monar and Mullardoch SLA and Central Highlands WLA. <i>[Requested by SNH in their Scoping Response.]</i>  |
| VP 23                               | THC1                                 | -                          | -                               | An Cabar (Ben Wyvis) (name tbc)                  | 245032, 866581 (tbc on site) | Illustrative of distant elevated views from hill top located in Rhiddoroch-Beinn Dearg-Ben Wyvis WLA and Ben Wyvis SLA. <i>[Requested by THC in their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development]</i>   |
| VP 24                               | THC2                                 | -                          | -                               | NCN1 Between Dingwall and Evanton                | 256687, 861447 (tbc on site) | Illustrative of distant views from national cycle route in coastal location. <i>[Requested by THC in their Scoping Response. Would have excluded for turbines under 150m tip height, due to distance from Proposed Development.]</i>   |
| VP 25                               | THC3                                 | -                          | -                               | Central Black Isle (on the road between Tore and | 261221, 853906 (tbc on       | Illustrative of distant views from rural settled area. <i>[Requested by THC in their Scoping Response.]</i>  |

| VP No.                              |                                      |                            |                                 | Location             | OS Grid Reference            | Reason for Selection / Exclusion  |
|-------------------------------------|--------------------------------------|----------------------------|---------------------------------|----------------------|------------------------------|---|
| Further VP Consultation (June 2020) | Post-Scoping Consultation (Oct 2019) | Scoping Report (July 2019) | Bhlaraidh Wind Farm LVIA (2012) |                      |                              |   |
|                                     |                                      |                            |                                 | Raddery)             | site)                        |   |
| VP 26                               | THC4                                 | -                          | -                               | A87 / A887 Bun Loyne | 221483, 809518 (tbc on site) | Illustrative of views from A road near Bun Loyne, Glen Moriston.<br>[Requested by THC in their Scoping Response.] |

**Sarah Tullie**

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**From:** Matt Burnett [REDACTED]  
**Sent:** 15 October 2019 16:42  
**To:** Nicola Sukatorn  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (SNH)  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Nicola,

Thank you for your email and I can confirm we have downloaded the figure successfully. We can discuss low light visualisations further if the proposed turbines are to be fitted with lights, as you suggest.

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

Scottish Natural Heritage | Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | [REDACTED]

Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT  
[nature.scot](#) – Connecting People and Nature in Scotland - [@nature\\_scot](#)

**\* tha seòladh puist-d ùr agam / I have a new email address – [REDACTED]**

All SNH email addresses have changed to a new format: [REDACTED]

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 15 October 2019 15:19  
**To:** Matt Burnett  
**Cc:** [REDACTED]  
**Subject:** Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (SNH)

Dear Matt,

Thank you for providing your recent consultation response to the Bhlaraidh Wind Farm Extension Scoping Report. Please find attached a consultation letter regarding the LVIA Viewpoints.

An accompanying figure can be downloaded from this link (which expires in 1 week on Tuesday 22<sup>nd</sup> October):  
[REDACTED]

Kind regards,



**Nicola Sukatorn**  
Senior Landscape Architect

ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL

Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)

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Company Registration Number: 03045838

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Tha am post-dealain seo agus fiosrachadh sam bith na chois dìomhair agus airson an neach no buidheann ainmichte a-mhàin. Mas e gun d' fhuair sibh am post-dealain seo le mearachd, cuiribh fios dhan manaidsear-sìostaim no neach-sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

\*\*\*\*\*

Our Ref.: 119009-L-SNH1-1.0.0

Date : 15.10.19

Scottish Natural Heritage  
Silvan House  
3<sup>rd</sup> Floor East  
231 Costorphine Road  
Edinburgh  
EH12 7AT

FAO : Matt Burnett, Renewable Energy Casework Advisor

Dear Matt,

#### **Bhlaraidh Wind Farm Extension LVIA: LVIA Viewpoints**

ASH design + assessment Ltd has been contracted to provide Landscape and Visual Impact Assessment (LVIA) services for the proposed Bhlaraidh Wind Farm Extension (the 'Proposed Development'). We write to you regarding the LVIA Viewpoints and your recent consultation response to the Scoping Report (23<sup>rd</sup> August 2019, your ref. A3040633).

Further consultation regarding other LVIA matters raised in your Scoping letter will be addressed separately.

#### *Proposed Viewpoints*

We appreciate your review of the proposed viewpoints for inclusion in the LVIA and propose the following:

- We agree that Viewpoint 13 (Carn Ghluasaid) can be relocated to Sgurr nan Conbhrairean (see VP **13 (SNH1)** on the attached plan).
- We note your comments regarding VP8 and a potential additional viewpoint at/near 218260, 823956. As suggested, we will include an additional viewpoint in this location (see **SNH2** on the attached plan) if there is theoretical visibility of the proposed development from the area around Loch Affric.
- We agree that two additional viewpoints can be added in the Glen Affric NSA at Toll Creagach and Sgurr na Ruaidhe (see **SNH3** and **SNH4** on the attached plan).
- If visible turbine lighting is required we understand that a lighting assessment is to be undertaken. We agree that at least two low light photomontages will be included to support the assessment and we note that SNH suggest VP 11 (Meal Mor, Glen Affric), VP 12 (Creag Dubh) and Toll Creagach as potentially suitable viewpoints, since effects on receptors in the NSA and WLA are noted as a key consideration. We will consult SNH further on the suitability of VPs used for the lighting assessment, and the scope of a lighting assessment, if turbine lighting is required.



Consultation with The Highland Council on proposed viewpoints is also being undertaken and you are included in this correspondence. A list of proposed viewpoints is appended to this letter (119009-N-VP), with a viewpoint plan (119009-D-VPC).

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

Kind regards,



**Jennifer Skrynka**  
Managing Director

Cc: Craig Cunningham and Alasdair Wilson (SSE Renewables); Roy Ferguson (ITP); Simon Hindson (THC); Mark Ashton (ECU)

## Post-Scoping Consultation Proposed Viewpoints

Table to be read in conjunction with drawing 119009-D-VP.

### Proposed Viewpoint List (Post-scoping amendments are in blue)

| VP No.   | Location                         | OS Grid Reference | Reason for Selection / Exclusion   |
|--|----------------------------------|-------------------|--|
| VP1  | Track to Loch Liath              | 235065, 818396    | Illustrative of open, very close-proximity view, from track on the site. [VP1 in the Bhlaraidh Wind Farm LVIA]   |
| VP2 (updated)  | Old Bridge, Invermoriston        | 241968, 816573    | Representative of close-proximity views from Invermoriston, taken from Old Bridge [Close to VP2 in Bhlaraidh Wind Farm LVIA, but more representative]  |
| VP3  | Meall Fuar-mhonaidh              | 245685, 822183    | Illustrative of elevated views from popular local hill summit on the north-western side of Loch Ness, within Loch Ness and Duntelchaig SLA. [VP3 in Bhlaraidh Wind Farm LVIA]  |
| VP 4 (new)   | A833 above Milton                | 249836, 832259    | Illustrative of new visibility, representative of elevated views from the A833 above Milton. [New VP requested in PAAP from A833 above Milton.]  |
| VP5a   | Suidhe Viewpoint, B862           | 244965, 810550    | Illustrative of elevated view from roadside Viewpoint marked on OS maps, on General Wade's military road, within Loch Ness and Duntelchaig SLA. [VP5 in Bhlaraidh Wind Farm LVIA]  |
| VP5b (new), illustrated on the attached plan as THC5 | Summit by Suidhe Viewpoint, B862 | tbc               | Illustrative of elevated view from popular summit near Suidhe Viewpoint carpark. Requested by THC in their Scoping Response.   |
| VP6  | B862 south of Foyers             | 249744, 817318    | Illustrative of views from the B862 road opposite the site. [VP6 in Bhlaraidh Wind Farm LVIA]  |
| VP7 (updated)  | Lochside picnic layby on B852    | 258078, 832144    | Illustrative of worst-case low-level views from shores of Loch Ness, on B-road, within Loch Ness and Duntelchaig SLA. [Close to VP7 in Bhlaraidh Wind Farm LVIA]   |
| VP 8 (new)   | Core Path north of Loch Affric   | 214824, 822851    | Illustrative of views from core path to the north of Loch Affric, at junction with mountain track, situated within Glen Affric NSA and Central Highlands WLA. [New VP requested in PAAP from route along north side of Loch Affric within NSA] |
| VP9  | Carn na Saobhaidhe               | 259930, 814395    | Illustrative of elevated views from popular corbett summit on southern side of Loch Ness. [VP9 in Bhlaraidh Wind Farm LVIA]  |
| VP10   | Great Glen Way                   | 256115, 839076    | Illustrative of elevated views from the Great Glen Way. [VP10 in Bhlaraidh Wind Farm LVIA]   |

|  |  |   |  |
|--|--|---|--|
| VP11   | Meall Mor, Glen Affric   | 224908, 828076                              | Illustrative of elevated views from local high point within Central Highlands WLA, on northern boundary of the Glen Affric NSA and southern boundary of the Monar and Mullardoch SLA. [VP11 in Bhlaraidh Wind Farm LVIA]   |
| VP12   | Creag Dhubh  | 222756, 821621                              | Illustrative of elevated view from hilltop within WLA, with views north across Glen Affric NSA. [VP12 in Bhlaraidh Wind Farm LVIA]   |
| VP13 (updated), illustrated as SNH1 on the attached plan | <del>Carn Chluasaid</del><br>Sgurr nan Conbhrairean                | <del>214586, 812511</del><br>212990, 813896 | Illustrative of elevated view from popular munro summit within Moidart, Morar and Glenshiel SLA and Central Highlands WLA; and on the edge of the Glen Affric NSA, as requested by SNH in their Scoping Response. [near to VP13 in Bhlaraidh Wind Farm LVIA]   |
| VP14   | Meall Dubh   | 224539, 807889                              | Illustrative of elevated view from corbett path, by Millenium Wind Farm [VP14 in Bhlaraidh Wind Farm LVIA]   |
| VP15   | Poll-gormack Hill  | 239064, 798038                              | Illustrative of elevated mid-range views from summit within Braeroy-Glenshirra-Creag Meagadh WLA, with views across the Corrieyarrick Pass. [VP15 in Bhlaraidh Wind Farm LVIA]   |
| VP16   | Geal Charn   | 256144, 798772                              | Illustrative of elevated views from Munro summit, on western boundary of CNP and near the boundary of the Monadhliath WLA. [VP16 in Bhlaraidh Wind Farm LVIA]  |
| VP17   | B862 south of Dores  | 259372, 832476                              | Illustrative of elevated view across Loch Ness from minor B-road, within Loch Ness and Duntelchaig SLA. [VP17 in Bhlaraidh Wind Farm LVIA]   |
| VP18   | Track near Dun Fhamhair fort                                       | 247258, 846682                              | Illustrative of longer range views from walking route near Beaully. [VP18 in Bhlaraidh Wind Farm LVIA]   |
| SNH2 on the attached plan                                | Path north of Affric Lodge (name tbc depending on location chosen) | 218260, 823956 approx. (tbc on site)        | Illustrative of elevated point on path north of Affric Lodge, on slopes of Am Meallan hill, within the Central Highlands WLA and Glen Affric NSA. Requested by SNH in their Scoping Response.<br><br>If theoretical visibility is removed from the area around Loch Affric, it is proposed that this VP is excluded from the LVIA as per SNH Scoping Response. |
| SNH3 on the attached plan                                | Toll Creagach  | 219454, 828289                              | Illustrative of elevated views from a Munro on the edge of the Glen Affric NSA and Strathconon, Monar and Mullardoch, within the Central Highlands WLA. Requested by SNH in their Scoping Response.  |
| SNH4 on the attached plan                                | Sgurr na Ruaidhe   | 228902, 842609                              | Illustrative of elevated views from a Munro within the Glen Strathfarrar group of hills and views over the Glen Strathfarrar NSA. It is also located within the Strathcnnon,   |

|                           |   |                                      |   |
|---------------------------|---|--------------------------------------|---|
|                           |   |                                      | Monar and Mullardoch SLA and Central Highlands WLA. Requested by SNH in their Scoping Response.   |
| THC1 on the attached plan | An Cabar (Ben Wyvis) (Name of VP tbc)                     | 245032, 866581 approx. (tbc on site) | <p>Illustrative of distant elevated views from hill top located in Rhiddoroch-Beinn Dearg-Ben Wyvis WLA and Ben Wyvis SLA. Requested by THC in their Scoping Response.</p> <p>If the proposed turbines are all <i>under</i> 150m tip height, it is proposed that this VP is excluded from the LVIA, given that the study area would be 40km, as per SNH guidance.</p> |
| THC2 on the attached plan | NCN1 Between Dingwall and Evanton                         | 256687, 861447 approx. (tbc on site) | <p>Illustrative of distant views from national cycle route in coastal location. Requested by THC in their Scoping Response.</p> <p>If the proposed turbines are all <i>under</i> 150m tip height, it is proposed that this VP is excluded from the LVIA, given that the study area would be 40km, as per SNH guidance.</p>  |
| THC3 on the attached plan | Central Black Isle (on the road between Tore and Raddery) | 261221, 853906 approx. (tbc on site) | Illustrative of distant views from rural settled area. Requested by THC in their Scoping Response.  |
| THC4 on the attached plan | A87 / A887 Bun Loyne                                      | 221483, 809518 approx. (tbc on site) | Illustrative of views from A road near Bun Loyne, Glen Moriston. Requested by THC in their Scoping Response.  |

## MEMO

Job **Bhlaraidh Wind Farm Extension**  
 Client **SSE Renewables Limited**  
 Memo no. **M162\_6497\_PeatlandAssessment\_2**  
 Date **04/02/2021**  
 To **Matt Burnett (NatureScot)**  
 From **Nadine Little (Ramboll)**  
 Copy to **Stephen McFadden (ECU); Adam Fitchet (Ramboll); Danny Oliver (Ramboll); Jane Macdonald (SSE); Louise Turnbull (SSE); Roy Ferguson (ITPE); Craig Cunningham (SSE); Carolyn Wilson (SSE)**

Dear Matt,

Date 04/02/2021

Thank you for your response to our peatland condition assessment on Friday the 22<sup>nd</sup> of January 2021. We are pleased to receive confirmation that NatureScot (NS) are content with our overall approach. This memo is intended to provide a response to the comments made in your email and the document you attached<sup>1</sup> and outline how we will take these forward within the Ecological Impact Assessment (EcIA).

Ramboll  
 5th Floor  
 7 Castle Street  
 Edinburgh  
 EH2 3AH  
 United Kingdom

T [REDACTED]  
[www.ramboll.co.uk](http://www.ramboll.co.uk)

## RESPONSE TO EMAIL COMMENTS

Habitat quality was assessed using the SSSI guidelines<sup>2</sup> definition of what constitutes an active/peat forming peatland based on factors such as a low frequency of drains and peat-cuttings and the presence of species indicating peat formation capability and/or a lack of disturbance. The SSSI guidance notes, in particular, species such as golden bog-moss *Sphagnum pulchrum*, rusty bog-moss *S. fuscum*, Baltic bog-moss *S. balticum*, magellanic bog-moss *S. magellanicum*, cow-horn bog-moss *S. auriculatum/denticulatum*, white beak-sedge *Rhynchospora alba*, great sundew *Drosera anglica* and black bog-rush *Schoenus nigricans*. The presence of a natural surface pattern was also used to indicate a higher quality site. The Heather Trust guidelines<sup>3</sup> were used to categorise each peatland as near-natural, modified or highly modified based on factors such as the extent of bog-moss *Sphagnum sp.* cover and the presence of bare peat and signs of drainage, whereby a bog would be categorised as near-natural if it contained a significant proportion of bog-moss *Sphagnum sp.*, even if this was dominated by red bog-moss *Sphagnum*

Ref M162\_6497\_PeatlandAssessment\_2.docx

<sup>1</sup> Provided in Appendix 1 for reference

<sup>2</sup> <http://data.jncc.gov.uk/data/20534790-bb45-4f33-9a6c-2fe795fb48ce/SSSIs-Chapter08.pdf>

<sup>3</sup> <https://www.nature.scot/sites/default/files/2017-10/Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf>

*capillifolium*. This information was then used to avoid siting infrastructure in areas of active and near-natural peatland, particularly blanket bog, as part of the design process. This information will also be used in the EcIA to determine the management prescriptions that can be used as mitigation to restore areas of poorer quality peatland, such as areas categorised as modified that contain drainage channels suitable for blocking.

For the purpose of this assessment, an active peatland was defined as a habitat that supported a significant area of peat-forming vegetation. Following the SSSI guidance, areas considered to be of higher quality contained uncommon species and a higher species diversity. For example, Compartment 9 and Compartment 23 contained near-natural peatland due to the presence of M2 bog pools and bog pools with abundant flat-topped bog-moss *Sphagnum fallax*, respectively. These details are provided in Appendix 2 of the report.

The proposed development has been designed to avoid damaging high quality and active peatlands. However, as the site is dominated by peatlands, it will not be possible to avoid impacts on all peatlands, such as wet heath and poorer quality blanket bog. These impacts will be assessed in the EcIA.

## LETTER COMMENTS

The following clarifications relate to your bullet point observations provided in the letter attached to your email:

- For the purpose of the peatland condition assessment, peat depth was used to divide the site into compartments for ease of recording. Both peat depth and the habitats already recorded on the site were used to guide the peatland assessment. A figure will be provided in the EcIA to show the peatland compartments overlain with the habitats present on the site;
- As discussed above, The Heather Trust guidance was used to categorise the peatland condition as near-natural, modified or highly modified. The SSSI guidance was used to determine peatland quality and whether the peatland could be defined as active, and these factors were tied in to whether the peatland was categorised as near-natural or modified under the Heather Trust guidance, with better quality, active peatland categorised as near-natural as it supports peat-forming vegetation and peatland with rare/absent bog-moss *Sphagnum sp.* and signs of erosion/disturbance categorised as poorer quality, inactive and modified peatland as it does not support a significant proportion of peat-forming vegetation;
- The field survey for the peatland condition assessment was a walkover survey covering all proposed infrastructure locations to determine the peatland condition at these locations. The species and proportion of bog-moss *Sphagnum sp.* was recorded as abundant, locally abundant, scarce or absent, with abundant and locally abundant areas categorised as near-natural and scarce or absent areas categorised as modified. As there is no guidance on what constitutes a significant area of peat-moss *Sphagnum sp.* or other peat-forming species, the extent of cover was based on surveyor experience. The data was recorded as field notes and included in a report. Example photos of near-natural and modified peatland areas were also taken. The information already gathered on the habitats and species present on the site during Phase 1 habitat and National Vegetation Classification (NVC) surveys was also taken into account as the surveys supplemented the peatland condition assessment with further data on the plant species present in each habitat and the habitat types present at each infrastructure location, with the extent and species of bog-moss *Sphagnum*

*sp.* recorded in peatland habitats. The dominant bog-moss *Sphagnum sp.* recorded on the site was red bog-moss, with other species only mentioned in the peatland condition assessment where they were encountered at infrastructure locations and where they were encountered was generally classified as areas of near-natural peatland as they contained more than just common species. Areas with abundant red bog-moss were also classified as near-natural but those that contained less common species were considered to be better quality; and

- We acknowledge your comment about removing the speculative observations on drainage, burning and grazing. This information was gathered by an experienced peatland surveyor and provides a useful overview of the site in relation to these factors, but we will review how the observations are used in the assessment.

Thank you again for your response. I hope this memo provides further clarification on how your observations will be considered during the EcIA process.

Yours sincerely,



**Nadine Little**

Senior Ecological Consultant  
Ecosystem Solutions

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Encl.                      Appendix 1, NS Comments and Advice

## **Appendix 1**

### **NS Comments and Advice**



## **Bhlaraidh Wind Farm Extension: Additional Peatland Condition Assessment Survey and Results – NatureScot Comments and Advice**

**Date: 22 January 2021**

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NatureScot welcomes all efforts to reduce impacts on peatlands during the planning, construction, management and eventual decommissioning of wind farms and other types of development.

This recent report endeavours to do this through the identification of areas of deep peat (>50 cm), the habitats represented within these and the condition of those peatland habitats present using the *Peatland Condition Assessment* <https://www.nature.scot/sites/default/files/2017-10/Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf> supplemented by aspects of the Guidelines for the selection of biological SSSI's, Part 2: Detailed guidelines for habitats and species groups: Chapter 8 - Bogs <http://data.jncc.gov.uk/data/20534790-bb45-4f33-9a6c-2fe795fb48ce/SSSIs-Chapter08.pdf>

Having identified areas of interest, the report then considers any likely impacts on these from proposed coincident or nearby infrastructure and mitigation measures to avoid or reduce these.

NatureScot is content with the overall approach which has the potential to reduce impacts on areas of valued peatland, particularly in habitat mosaics such as occur at Bharaidh. We also make the following observations:

- The 'compartments' appear to be based solely on peat depths (peat predominantly >50 cm). It might be helpful, and it would provide a direct link to Scottish Planning Policy's reference at Table 1 to 'carbon rich soil, deep peat and priority peatland habitat' <https://www.gov.scot/publications/scottish-planning-policy/> if they were defined by both peat depth and habitat.
- The condition of the compartments is assessed using the Heather Trust *et al*'s Peatland Condition Assessment and JNCC's SSSI Selection Guidelines: Bogs. It is not, however, clear how the criteria in these two very different documents are brought together and interpreted in a consistent manner.
- In relation to determining whether and area is 'near-natural' in assessing peatland condition (pp 3-4), it is not clear what effort goes into searching for different species of *Sphagnum*, or what cover is required. Or indeed how the data recorded. It may

also be that 'supporting peat forming vegetation' is actually a more valuable and more easily determined attribute than 'near-natural'.

- The 'Summary' on page 12 acknowledges that comments relating to Drainage, Burning and past Grazing are essentially speculative and could probably be removed without affecting the conclusions.

Matt Burnett  
Renewable Energy Casework Adviser  
NatureScot  
Silvan House,  
231 Corstorphine Road,  
Edinburgh,  
EH12 7AT

Dear Matt,

**BHLARAI DH WIND FARM EXTENSION: REQUEST FOR NATURESCOT  
COMMENT ON ADDITIONAL PEATLAND CONDITION ASSESSMENT  
SURVEY AND RESULTS**

Date 09/12/2020

Ramboll UK Limited (Ramboll) has been appointed for the provision of Ecological Impact Assessment (EclA) services by SSE Renewables Developments (UK) Ltd (SSER) for the proposed Bhlaraiddh Wind Farm Extension (the proposed development) application to the Scottish Government's ECU under Section 36 of The Electricity Act (1989). Ramboll has produced this letter to summarise the survey effort and results of a peatland condition assessment undertaken for the proposed development between October the 26th and October the 29<sup>th</sup> 2020. On behalf of SSER, Ramboll requests confirmation from NatureScot (NS) on the suitability of the peatland condition assessment survey methodology and gathered data for the proposed development for EclA purposes.

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Further to your scoping response of the 23<sup>rd</sup> of August 2019 that highlighted the presence of Class 1 or 2 priority peatland habitat on the site, the peatland condition assessment was completed to assess the condition of peatland on the site in order to consider better quality areas of peatland as part of the design process.

**THE PROPOSED DEVELOPMENT**

The red line boundary and infrastructure of the proposed development are shown on Figure 1 in Appendix 1. At present, 18 turbines are proposed, subject to further technical and environmental review through the EclA process.

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## METHODOLOGY

### Survey Work Already Completed

As mentioned in the scoping report, National Vegetation Classification (NVC) and Phase 1 habitat surveys have already been completed on the site in June 2019 following best practice methodology<sup>12</sup>. This work, coupled with further peat probing in September 2020, was used to guide the peatland condition assessment.

### Peatland Condition Assessment

The field survey was based on the peat depth results provided as Figure 2 in Appendix 1 as this showed both the areas of deep peatland (over 0.5 m deep) and the proposed locations for infrastructure. Areas of shallow peat containing proposed infrastructure were also surveyed and their general condition noted.

The survey was concentrated within the general vicinity of the proposed infrastructure. The much larger number of smaller outlying pockets unlikely to be affected by the proposed development were only recorded if they happened to be encountered and were deemed noteworthy.

Individual peatland survey units ('compartments') were numbered individually based on peat depth to allow notes on the peatland condition and observations regarding the potential impacts of any proposed infrastructure within or close to each compartment to be recorded. The condition of each compartment was recorded by means of target notes and, where necessary, further subdivided for assessment purposes. The target notes classified the condition of the compartments based on the guidance produced by The Heather Trust et. al.<sup>3</sup> and the JNCC guidance for selecting biological SSSIs<sup>4</sup>. This recognises six key factors that determine the condition of a peatland. These are:

#### 1. Sphagnum moss cover

A key component of an active peatland, this was used as one of the primary indicators of determining the degree of peatland modification. The extent alone gives a good indication of how high the water table is and, therefore, to what extent a peatland is still functioning (i.e. growing and sequestering carbon). The extent was recorded as abundant, locally abundant, scarce or absent based on the proportion of bog-moss *Sphagnum* sp. present in each compartment. A high water table provides opportunities for less common species to colonise whereas a lower water table limits both the extent of cover and the species diversity. Bog pools in particular are both conspicuous and invaluable indicators according to the species they support. In NVC terms, M2 *Sphagnum cuspidatum/recurvum* bog pool communities support an abundance of bog-moss *Sphagnum* sp., such as feathery bog-moss *S. cuspidatum* and flat-topped bog-moss *S. fallax*, and indicate near-natural conditions. M3 *Eriophorum angustifolium* bog pool communities, on the other hand, are species-poor, usually dominated by common cottongrass *Eriophorum angustifolium* underlain by bare peat, indicating a peatland that is tending towards highly modified.

<sup>1</sup> Joint Nature Conservation Committee (JNCC), (2010), Handbook for Phase 1 habitat survey – a technique for environmental audit, ISBN 0 86139 636

<sup>2</sup> [http://jncc.defra.gov.uk/pdf/pub06\\_NVCUsershandbook2006.pdf](http://jncc.defra.gov.uk/pdf/pub06_NVCUsershandbook2006.pdf)

<sup>3</sup> <https://www.nature.scot/sites/default/files/2017-10/Guidance-Peatland-Act on-Peatland-Condition-Assessment-Guide-A1916874.pdf>

<sup>4</sup> <http://data.jncc.gov.uk/data/20534790-bb45-4f33-9a6c-2fe795fb48ce/SSSIs-Chapter08.pdf>

## 2. The presence of bare peat

The presence of bare peat indicates that the water table has become lowered and that part of the peatland, at least, is no longer functioning. Over time, the higher, drier hummocks come to resemble wet heath rather than bog. This, too, is an important indicator that a peatland is highly modified. The presence of bare peat was quantified using percentage cover, where possible. Where this was not possible i.e. where the proportion was too small to quantify as a percentage, such as with areas of micro-erosion, the presence of bare peat was described.

## 3. Drainage

In this context, drainage means the creation of artificial channels or the artificial deepening of existing channels that lowers the water table and inhibits or prevents peatland formation. The presence of drainage channels was described where it was encountered.

## 4. Burning

Historic burning tends to eliminate bog-moss *Sphagnum* sp., which leads to erosion (indicated by bare peat) and this sign was recorded where present. The presence of burning was quantified using percentage cover, where possible. Where this was not possible i.e. where the proportion was too small to quantify as a percentage, the presence of burning was described.

## 5. Grazing and trampling

Grazing and trampling can disturb fragile species such as bog-moss *Sphagnum* sp., exposing bare peat and leading to erosion. The presence of grazing and trampling was quantified using percentage cover, where possible. Where this was not possible i.e. where the proportion was too small to quantify as a percentage, the presence of grazing and trampling was described.

## 6. Peat loss

From erosion that has created channels with bare peat and hummocky terrain. The presence of peat loss was quantified using percentage cover, where possible. Where this was not possible i.e. where the proportion was too small to quantify as a percentage, such as with areas of micro-erosion, the presence of peat loss was described.

The peatland condition was then categorised as follows:

### 1. Near-natural

Near-natural peatland has a high water table with an abundance of bog-moss *Sphagnum* sp., indicating a functioning peatland. To be classified as near-natural, the peatland has to support bog-moss *Sphagnum* sp. other than the ubiquitous red bog-moss *S. capillifolium*. Papillose bog-moss *S. papillosum*, compact bog-moss *S. compactum* and cow-horn bog-moss *S. denticulatum* are useful indicators that an area of peatland is active and much less modified and, therefore, approaching near-natural. *Sphagnum*-rich bog pools and a natural surface pattern, such as hummocks, hollows and ridges, are also good evidence of conditions approaching near-natural. Where areas have been classified as near-natural as part of this assessment, it indicates that less common species and/or bog pools and a natural surface pattern were recorded as described above.

## 2. Modified

Most peatland in the UK is modified to some extent. This is further sub-divided into modified, which is less than near-natural but not overly degraded, or highly modified, which is degraded with a lowered water table, low abundance/absence of bog-moss *Sphagnum* sp. and some degree of erosion. Essentially, modified means still functioning as an active peatland while highly modified means that a large percentage of the area is no longer functioning as an active peatland.

## 3. Drained

This means drainage by artificial means either in the form of excavated drainage channels or the artificial deepening of existing natural channels to the extent where the peatland is no longer functioning.

## 4. Actively Eroding

Where bare peat occurs, a peatland is actively eroding. This can range from micro-erosion of small patches as the peatland dries out and bog-moss *Sphagnum* sp. cover is lost, to bare peat in the margins of bog pools or within deeper, more incised and clearly defined channels.

The above factors and categories were used as the basis for assessing each of the surveyed compartments to then determine the peat-forming ability of the habitat (i.e. whether the peatland was active or inactive). A peatland was considered to be active if it supported a significant area of peat-forming species. What constitutes a significant area was based on the interpretation of the experienced surveyor.

NVC codes<sup>5</sup> were used when referring to specific plant communities.

## Review of Habitat Results

The results of the peatland condition assessment were then used in combination with the NVC and peat depth information to recommend any required modifications to the locations of proposed infrastructure. The NVC habitats present on the site are shown on Figure 3 in Appendix 1. This information will be taken forward through the design freeze process and engineering assessment, in order to optimise the layout of the proposed development.

## RESULTS

### General Summary

For the most part, the peatland surveyed fell into the modified category, with some compartments showing higher levels of disturbance/degradation than others. Where a compartment was found to be only slightly modified (i.e. with a high water table and good covering of bog-moss *Sphagnum* sp., including slightly fewer common species, such as papillose bog-moss), it was listed as near-natural. Where the water table was clearly lowered, the terrain often hummocked, with bare peat and clear signs of erosion, the compartment was classified as highly modified. All compartments contained a mosaic of near-natural and modified areas.

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<sup>5</sup> Rodwell, J.S. (2006): National Vegetation Classification: User's Handbook. Peterborough: JNCC.

## Shallow Peat Areas

Descriptions of the habitat close to areas of infrastructure but outwith a surveyed compartment are included in the relevant compartment descriptions in Appendix 2. The shallower peat present on the site is M15 *Scirpus cespitosus*-*Erica tetralix* wet heath, with occasional minor patches of other non-mire communities such as M25a *Molinia caerulea*-*Potentilla erecta* marshy grassland.

From the observation made during the condition survey and assessed in combination with the previous habitat data, it can be concluded that no areas of active, peat-forming habitat were recorded in the shallow peat areas containing proposed infrastructure outwith the compartments. The NVC and plant species information will be provided in the EcIA. The shallow peat areas were dominated by red bog-moss with drier hummocks and a lower water table.

The focus of the remainder of this assessment will be on priority peatland areas. The impacts on Annex 1<sup>6</sup> habitats, such as wet heath, will be considered further in the EcIA. For the purposes of this assessment, active, peat-forming habitats have been prioritised.

## Compartments

Thirty-six compartments were identified, as shown on Figure 4 in Appendix 1, and their classification is detailed in Table 1. Full details of the results are provided in Appendix 2.

**Table 1: Peatland Assessment of Compartments**

|             | Category                              |   |  |
|-------------|---------------------------------------|---|--|
|             | Near-natural                          | Modified  | Highly Modified  |
| Compartment | 1a, 7, 9, 13, 15, 16, 17<br>23 and 31 | 1a, 1b, 2, 3, 4, 5a, 5b,<br>6, 7, 8, 9, 10, 11, 12,<br>13, 14a, 14b, 15, 17,<br>18, 19, 20, 21, 23, 24,<br>25, 26, 27, 28, 29, 30<br>and 31 | 1a, 1b, 2, 3, 5a, 5b, 7,<br>8, 9, 10, 11, 12, 13,<br>14b, 14c, 17, 18, 19,<br>20, 21, 22, 27, 28, 29,<br>30, 31 and 32 |
| Total       | 9                                     | 32  | 27   |

The following factors were also noted:

- Drainage (all artificially deepened natural channels) in Compartments 3, 9 and 14b;
- Trampling (exacerbating erosion) in Compartments 5a and 29; and
- Burning (historic burning leading to erosion) in Compartments 7, 9 and 13.

These factors were difficult to quantify as a percentage due to the small proportions present on the site, therefore descriptions are provided where they were encountered.

Proposed infrastructure locations within or near compartments that require further consideration are detailed in Table 2.

<sup>6</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01992L0043-20130701#tocId36>

Table 2: Recommendations for Proposed Infrastructure

| Compartment | Grid Reference    | Condition  | Proposed Infrastructure  | Recommendation   |
|-------------|-------------------|--|--|--|
| 7           | NH 38242<br>21996 | Bog 60%. Near-natural 5%, Modified 30%, Highly Modified 65%  | Hardstanding proposed at NH 382 221 and access track.                                      | The hardstanding is located at the margin of the bog and would not have a direct impact. However, as the hardstanding is located up-slope, run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.<br><br>The access track should be micro-sited to avoid the areas of deepest peat or a floating track construction would be used. |
| 9           | NH 39349<br>21874 | Bog 80%. Near-natural 20%, Modified 30%, Highly Modified 10% | Hardstanding and borrow pit search area to the east  | The infrastructure doesn't encroach on the bog. However, the infrastructure is located up-slope, therefore run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.  |
| 10          | NH 39305<br>21551 | Bog 60%. Modified 90%, Highly Modified 10%                   | Hardstanding is encroaching on an area of eroded bog but situated mostly on M15 wet heath. | Exposed bedrock shows where the peat is shallower, with a deeper area to the north. The location of the hardstanding should be micro-sited to avoid what is some of the deepest peat in the site. However, as the hardstanding is also located up-slope, run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of   |





| Compartment | Grid Reference    | Condition                                 | Proposed Infrastructure  | Recommendation  |
|-------------|-------------------|---|--|---|
|             |                   |   |  | the EcIA and appropriate construction mitigation will be identified.  |
| 11          | NH 38945<br>21478 | Bog 60%. Modified 5%, Highly Modified 95% | Hardstanding within compartment, access track up-slope and borrow pit search area to west. | <p>The proposed hardstanding is located just northwards of the most intact bog within this compartment, therefore run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.</p> <p>The borrow pit search area located immediately to the west of this compartment is on a very steep slope, therefore control of any run-off will be important along with the careful reinstatement of the habitat following construction. Impacts will be fully assessed and considered as part of the EcIA and appropriate mitigation will be identified.</p> <p>The access track itself is located up-slope from the compartment, therefore, run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.</p> <p>To the south of Compartment 11, two small stretches of M11 Carex demissa – Saxifraga aizoides mire containing yellow saxifrage Saxifraga</p> |

| Compartment | Grid Reference | Condition                                   | Proposed Infrastructure   | Recommendation  |
|-------------|----------------|---|---|---|
|             |                |   |   | alzoides occur at NH 38899 21393 and NH 38844 21173. The former has only a small fragment of saxifrage remaining while the latter has a scattering stretching several metres from NH 38844 21173 down to NH 38879 21144. This species is locally scarce and an indicator of more calcareous conditions within a discreet area. It can easily be identified as a stony flush with a scattering of sedges Carex sp. The access track proposed in this area should be micro-sited to avoid these small patches.  |
| 12          | NH 38926 20868 | Bog 100%. Modified 60%, Highly Modified 40% | Borrow pit search area and hardstanding close to compartment. Access track within compartment | <p>The borrow pit search area is located to the north/north-west around NH 38700 21100. This is entirely on M15c wet heath and some distance from the compartment, but located up-slope, therefore run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.</p> <p>The hardstanding is located around 100 m to the south-west at NH 38700 20690 on a sloping mosaic of wet heath, dry heath and purple moor-grass Molinia caerulea. There are scattered fragments of poorly-formed bog but on shallow peat, therefore no adjustment to the infrastructure location is required.</p> |

| Compartment | Grid Reference | Condition  | Proposed Infrastructure                                 | Recommendation  |
|-------------|----------------|--|---|---|
|             |                |  |   | The access track should be micro-sited to avoid the areas of deepest peat or a floating track construction should be used.  |
| 15          | NH 39202 21106 | Bog 90%. Near-natural 5%, Modified 95%                     | Substation options                                      | The substation option at NH 3918 2110 would be partly on highly modified bog, turning to M15c wet heath but also only slightly modified, near-natural bog with a high water table and Sphagnum-rich bog pools. Shifting the location 100 m south or south-west would avoid the richest part of the bog. The other option at NH 3905 2089 or a point somewhere between these two locations also appears more suitable in terms of having much less impact on the bog and areas of deep peat. |
| 16          | NH 39350 21290 | Bog 100%. Near-natural 40%, Modified 60%                   | Batching plant search area to the south at NH 3939 2125 | This compartment contains mostly M15 wet heath, with only small patches tending towards bog. However, the area drains towards the richest part of the bog in this compartment, therefore run-off could indirectly impact the bog. Impacts will be fully assessed and considered as part of the EcIA and appropriate construction mitigation will be identified.   |
| 17          | NH 39595 21049 | Bog 90%. Near-natural 5%, Modified 90%, Highly Modified 5% | Hardstanding at NH 39500 20960 and access track         | The hardstanding is located on a mosaic of M15c wet heath, with around 20% bog that is not species-rich, therefore no adjustment to the location is required. The access  |

| Compartment | Grid Reference    | Condition                                  | Proposed Infrastructure             | Recommendation   |
|-------------|-------------------|--|-------------------------------------|--|
|             |                   |  |                                     | track to the north would be better located to the west, passing through the area of more degraded bog.   |
| 22          | NH 40175<br>21300 | Bog 75%. Modified 75%, Highly Modified 25% | Borrow pit search area to the south | The area north of the borrow pit search area at NH 40073 21276 is the least modified, with a high water table and abundant bog-moss Sphagnum sp. Immediately to the south-west, it becomes highly modified, with hummocks tending towards wet heath. To the south, the topography steepens and there is very little bog. If a borrow pit is required at this location, the southern part of the borrow pit search area would be more suitable. |
| 24          | NH 40000<br>20750 | Bog 5%. Modified 100%                      | Hardstanding                        | This compartment is predominantly M15 wet heath on shallow peat with exposed bedrock. However, the hardstanding should be micro-sited to avoid deeper areas of peat.   |
| 25          | NH 40400<br>21395 | Bog 10%. Modified 70%, Eroding 30%         | Borrow pit search area              | Bog-moss Sphagnum sp. is confined to wetter areas adjacent to bog pools, but most pools are species-poor M3, some with eroding peat at the margins. The bog and deepest peat are to the south of the small lochan, therefore any excavation/construction should avoid this area.   |
| 29          | NH 40800<br>21150 | Bog 60%. Modified 60%, Highly Modified 40% | Access track                        | The access track cuts through the area of most heavily eroded bog, therefore the location is of no ecological significance beyond direct   |



| Compartment | Grid Reference | Condition | Proposed Infrastructure | Recommendation  |
|-------------|----------------|-----------|-------------------------|---|
|             |                |           |                         | disturbance to peat. However, the track should be micro-sited to avoid the deeper area of peat. |

## SUMMARY

### **Sphagnum Moss Cover**

The only species recorded in any abundance in the compartments and in the shallow peat areas was red bog-moss, a species that is common in wet heath. The main exception was where M2 bog pools were recorded, with flat-topped bog-moss and, to a lesser extent, feathery bog-moss. Papillose bog-moss was also found to be a conspicuous indicator that less common species were present and, therefore, where this species was recorded, or where M2 bog pools were recorded, approached near-natural and were active, peat forming areas. Photographs and descriptions of near-natural, modified and highly modified peatland recorded on the site are provided in Appendix 2. These results are also reflected in the habitat and species data already gathered for the site, which will be provided in the EcIA.

### **Bare Peat**

Bare peat was confined to the margins of species-poor M3 bog pools and a few deeper channels. The surface area was usually too small to record as a percentage of the peatland. Micro erosion, whereby wind and precipitation act on small patches exposed through loss of bog-moss *Sphagnum* sp. (usually as a result of burning), was noted wherever it was found in abundance but was otherwise too difficult to quantify as a percentage of the total area.

### **Drainage**

Though no artificial drainage channels were recorded, in some places it appeared that natural channels could have been artificially deepened in the past.

### **Burning**

Though no signs of recent burning were recorded, it seems likely from the condition of most of the peatland that burning has occurred in the past. The evidence for this historic burning is secondary (in that no actual burned vegetation remains) in the form of peat loss and erosion, commencing with micro-erosion to the presence of incised channels with bare peat.

### **Grazing and Trampling**

Deer signs were widespread. However, grazing was not particularly evident and trampling was only noted where it was clearly leading to a degree of erosion. However, it seems likely that levels were much higher in the past.

### **Peat Loss**

Though widespread, this was normally in the form of hummock and hollow terrain, with the higher, drier parts tending to wet heath and the lower parts still retaining some semblance of bog. In some places, micro-erosion was evident, but larger, deeper channels with bare peat were generally localised, usually approaching bog margins.

Using these factors, the following assessments were made:

### **Near-natural**

Nine compartments support near-natural peatland at a small percentage of the total area of peatland present (ranging from 5% to 40% of the compartment). When compared with peatland in the

surrounding area that are notified as Sites of Special Scientific Interest (SSSIs) and truly approaching a natural condition, none of the peatland present on the site is of a similar high quality. This comparison was made based on the personal experience of the surveyor.

### **Modified**

Thirty-two compartments support modified peatland (ranging from 5% to 100% of the compartment). These areas are considered to be functioning as a peatland, with actively growing bog-moss *Sphagnum* sp. and the laying down of peat. The significance of the modified category needs to be taken in context, particularly where the percentage of modification is low. If the compartment also supports a relatively high percentage of near-natural peatland then the low percentage of modified peatland is a positive sign for active peatland, such as is present in Compartments 9, 13, 16 and 31. However, if the majority is highly modified, it is a negative sign for active peatland, such as present in Compartments 2, 5a, 5b, 7, 8, 11, 14b, 20, 21, 22, 26, 28, 30, 32. That being the case, the percentage of modified peatland present is of less significance than the percentage of near-natural and highly modified peatland present.

### **Highly Modified**

Twenty-seven compartments support highly modified peatland (ranging from 5% to 100% of the compartment). This is used to denote degraded areas, large parts of which are no longer functioning as an active peatland. This is usually in the form of a hummock and hollow terrain where the drier hummocks tend towards wet heath. The sunken hollows (sinking as the water table falls and erosion occurs) could still support areas of functioning peatland, but more frequently they contain species-poor bog pools and bare, eroding peat. Where this erosion is pronounced, clear channels are formed and the rate of erosion increases further.

### **Drained**

No compartments show signs of artificial drainage except in the historic artificial deepening of natural channels within Compartments 3, 9 and 14b.

### **Actively Eroding**

Some parts of virtually all compartments are actively eroding. Where pronounced, this is noted as highly modified peatland. Other areas tend to be more discreet, normally towards the margins. Micro erosion is noted where conspicuous in Compartments 1b, 7, 9, 13.

## **RECOMMENDATIONS**

### **Proposed Infrastructure**

Compartments 7, 9, 10, 11, 12, 15, 16, 17, 22, 24, 25 and 29 contain proposed infrastructure that requires consideration in or close to the compartment. For the most part, appropriate mitigation during construction, such as avoiding run-off onto adjacent better-quality peatland and the maintenance of hydrological connectivity, would avoid potential impacts. Impacts will be fully assessed and considered as part of the EclA and appropriate construction mitigation will be identified. Micro-siting of the hardstanding in Compartment 10 and 24, the access track in Compartment 7, 11, 12, 17 and 29, the borrow pit search area in Compartment 11, 22 and 25, and the substation in Compartment 15 would also avoid areas of better-quality, active peatland. Adjustments to the proposed infrastructure outwith

the compartments are not considered to be required. Areas of shallow peat outwith the compartments are dominated by M15 wet heath and are not active peatland. The impact of the proposed development on Annex 1 wet heath will be considered in the EcIA.

## CONCLUSION

The proposed development has already, to a large degree, avoided the areas of better quality, active peatland, with only small modifications recommended to the locations of the proposed infrastructure. These areas will now be taken forward through the design freeze process and engineering assessment.

Based on the foregoing information and attached figures, I would be very grateful to receive your comments on the suitability of our survey scope based on the results achieved for the proposed Bhlairaidh wind farm extension and the recommendations for the avoidance of better quality, active peatland.

I would be very happy to discuss this matter further with you if required.

Yours sincerely,



**Nadine Little**

Senior Ecological Consultant  
Ecosystem Solutions

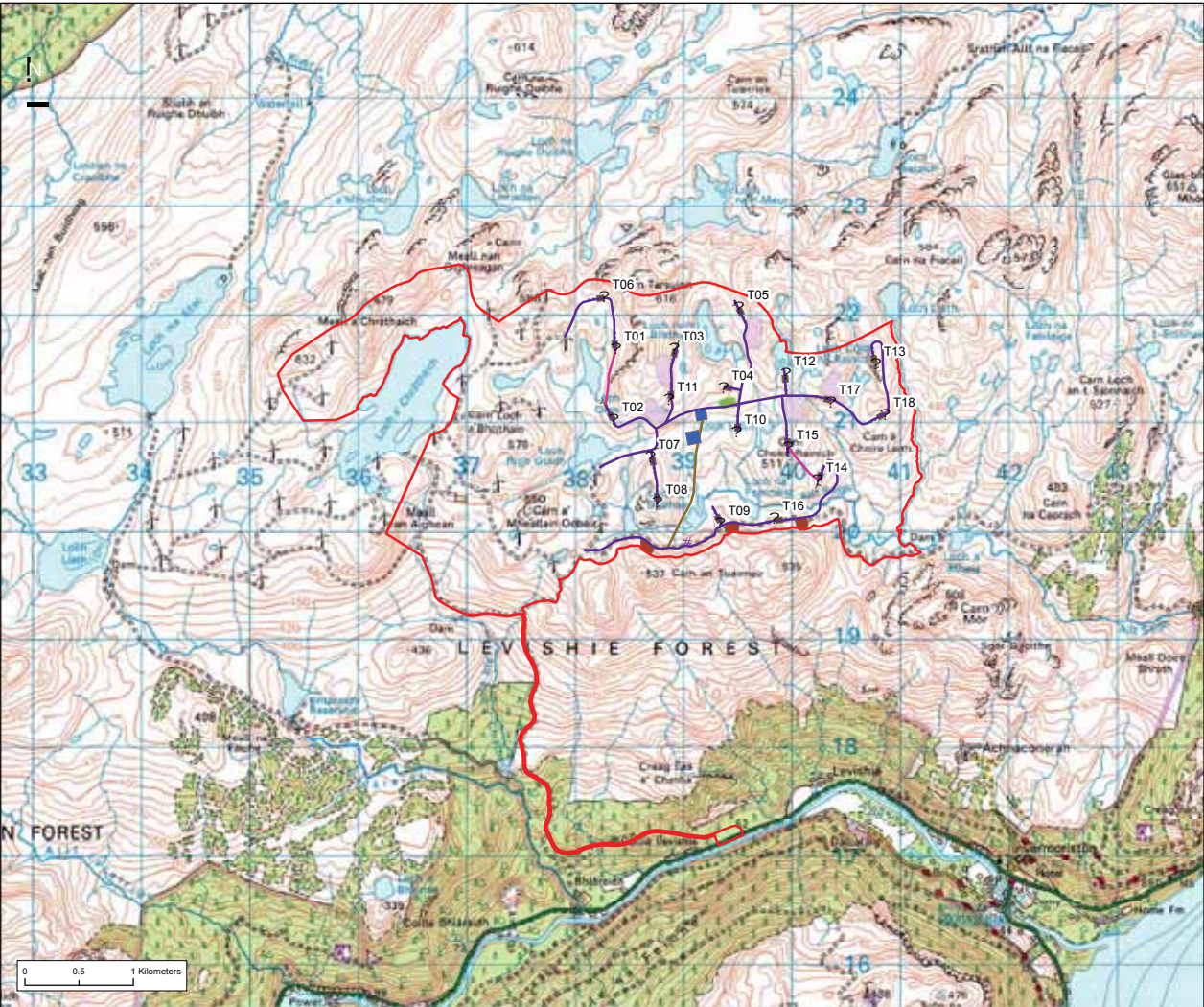
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Encl.                      Appendix 1, Figures  
                                Appendix 2, Detailed Results



## **Appendix 1**

### **Figures**



**Legend**

- Site Boundary
- Turbine Layout
- LIDAR
- Access Track
- Cross Country Cable
- Cable Route
- Hardstanding
- Turning Heads
- Substation Options
- Hydro Borrow Pits Search
- Borrow Pits Search
- Batching Plant Search

Figure Title

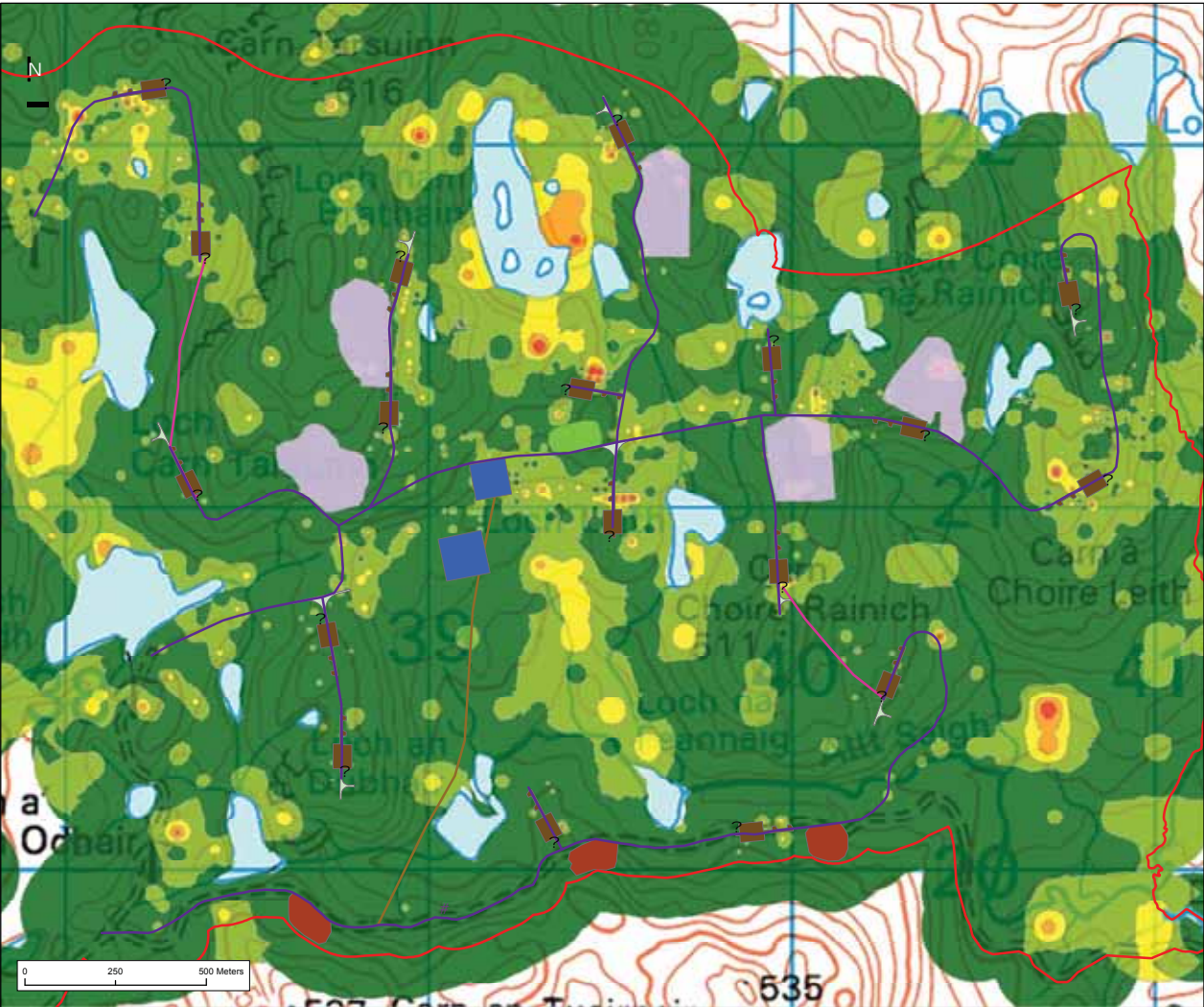
Site Location

Project Name

Bhlaraith Extension

|                |             |
|----------------|-------------|
| Project Number | Figure No.  |
| 1620006497     | 1           |
| Date           | Prepared By |
| December 2020  | NL          |
| Scale          | Issue       |
| 1:33,500 @A3   | 1           |
| Client         |             |
| SSER           |             |
| RAMBOLL        |             |





**Legend**

- Site Boundary
- Turbine Layout
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- Access Track
- Cross Country Cable
- Cable Route
- Hardstanding
- Turning Heads
- Substation Options
- Hydro Borrowpits Search
- BorrowPits Search
- Batching Plant Search

**Peat Depth (m)**

- 0 - 0.5
- 0.5 - 1
- 1 - 1.5
- 1.5 - 2
- > 2

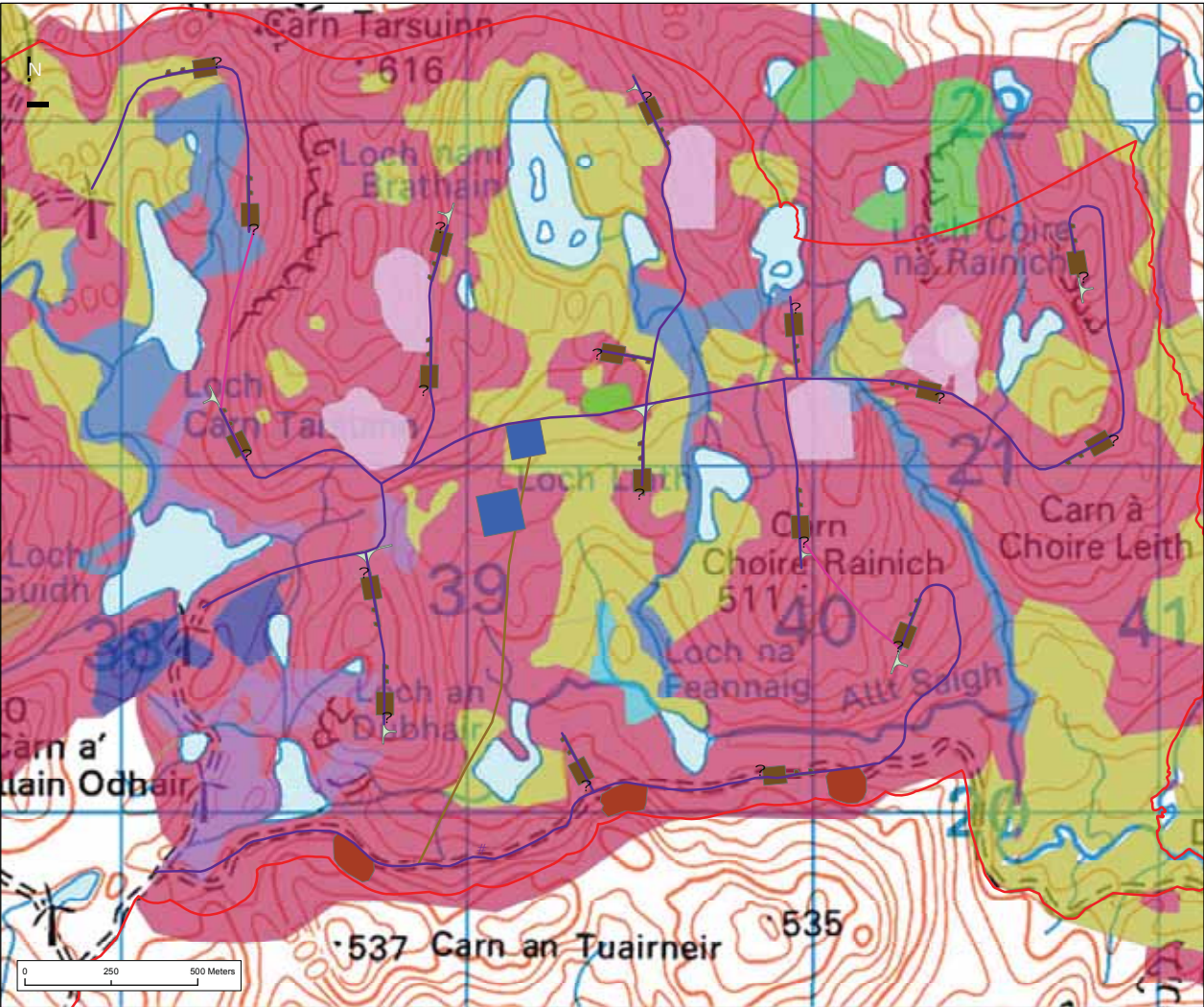
Figure Title  
**Peat Depth Results**

Project Name  
**Bhlaraidh Extension**

|                                     |                          |
|-------------------------------------|--------------------------|
| Project Number<br><b>1620006497</b> | Figure No.<br><b>2</b>   |
| Date<br><b>December 2020</b>        | Prepared By<br><b>NL</b> |
| Scale<br><b>1:10,000 @A3</b>        | Issue<br><b>2</b>        |

Client  
**SSER**

**RAMBOLL**



**Legend**

- Site Boundary
- Turbine Layout
- LIDAR
- Access Track
- Cross Country Cable
- Cable Route
- Hardstanding
- Turning Heads
- Substation Options
- Hydro Borrow Pits Search
- Borrow Pits Search
- Batching Plant Search

**NVC**

- H9e
- M15
- M15b
- M15c
- M17
- M17 and M15
- M17/M17a/M18a/M19a
- M17a
- M19a

**Figure Title**

NVC Results

|  |                              |
|--|------------------------------|
| <b>Project Name</b> <p>Bhlaraidh Extension</p> |                              |
| <b>Project Number</b> <p>1620006497</p>        | <b>Figure No.</b> <p>3</p>   |
| <b>Date</b> <p>December 2020</p>               | <b>Prepared By</b> <p>NL</p> |
| <b>Scale</b> <p>1:10,500 @A3</p>               | <b>Issue</b> <p>2</p>        |
| <b>Client</b> <p>SSER</p>                      |                              |





**Legend**

- Site Boundary
- Turbine Layout
- LIDAR
- Access Track
- Cross Country Cable
- Cable Route
- Hardstanding
- Turning Heads
- Substation Options
- Hydro Borrowpits Search
- BorrowPits Search
- Batching Plant Search

**Peat Depth (m)**

- 0 - 0.5
- 0.5 - 1
- 1 - 1.5
- 1.5 - 2
- > 2

Figure Title  
Peat Condition Assessment

Project Name  
Bhlaraidh Extension

Project Number  
1620006497

Figure No.  
4

Date  
December 2020

Prepared By  
NL

Scale  
1:10,000 @A3

Issue  
3

Client  
SSER

## **Appendix 2**

### **Detailed Results**

# **Bhlaraidh Peatland Condition Survey Results**

**October 2020**

**Produced by:**

**Paul Gallagher  
58 Lawers Way  
Inverness  
IV3 8NU**

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| <b>Summary of Assessment</b>                             | <b>17</b>   |
| <b>Implications for proposed infrastructure</b>          | <b>19</b>   |
| <b>Reference</b>   | <b>20</b>   |
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| <b>Map: Peat Depth with numbered survey Compartments</b> | <b>22</b>   |



## Results

For the most part the peatland surveyed fell into the Modified category with some areas showing higher levels of disturbance/degradation than others. Frequently this was in the form of a mosaic too complex to sub-divide on the map rather than just a discreet area and so percentages have been used. Where an area of the bog was found to be only slightly modified (i.e.. with a high water table and good covering of *Sphagnum*, including slightly less common species) it was listed as Near Natural. Where the water table was clearly lowered, the terrain often hummocked, with bare peat and clear signs of erosion the area was classified as Highly Modified. When it comes to factors such as being Drained, Burned, Trampled or Actively Eroding these were normally more difficult to quantify in terms of percentages of surface area covered and were therefore simply described. (For definitions of grades see method above.)

32 individual Compartments were identified, 3 of them further sub-divided for ease of description making a total of 36. These break down as follows:

### **Near Natural: 9 Compartments**

4 = 5% (Compartments 1a, 7, 15, 17)  
1 = 10%, (Compartment 23)  
1 = 20% (Compartment 9),  
2 = 30% (Compartments 13, 31),  
1 = 40% (Compartment 16, a very small outlier of an adjacent bog).

### **Modified: 32 Compartments**

1 = 5% (Compartment 11)  
1 = 10% (Compartment 30)  
1 = 20% (Compartment 5b)  
6 = 30% (Compartments 7, 8, 9, 20, 21, 28)  
1 = 40% (Compartment 14b)  
4 = 50% (Compartments 2, 5a, 13, 31)  
3 = 60% (Compartments 1b, 12, 29)  
2 = 70% (Compartments 3, 25)  
3 = 80% (Compartments 1a, 18, 19)  
4 = 90% (Compartments 10, 15, 17, 23)  
1 = 95% (Compartment 27)  
5 = 100% (Compartments 4, 6, 14a, 24, 26)

**Highly Modified: 27 Compartments**

|          |                                |
|----------|--------------------------------|
| 3 = 5%   | (Compartments 1a, 17, 27)      |
| 2 = 10%  | (Compartments 9, 10)           |
| 4 = 20%  | (Compartments 13, 18, 19, 31)  |
| 1 = 30%  | (Compartment 3)                |
| 4 = 40%  | (Compartments 1b, 12, 14c, 29) |
| 2 = 50%  | (Compartments 2, 5a)           |
| 1 = 60%  | (Compartment 14b)              |
| 1 = 65%  | (Compartment 7)                |
| 4 = 70%  | (Compartments 8, 20, 21, 28),  |
| 1 = 80%  | (Compartment 5b)               |
| 1 = 90%  | (Compartment 30)               |
| 1 = 95%  | (Compartment 11)               |
| 2 = 100% | (Compartments 22, 32)          |

To make sense of this a certain amount of analysis is required. For example a smaller percentage of modification could be a good thing if it means a higher percentage of Near Natural, or a bad thing if it means more Highly Modified. See the Discussion section below for this.

- **Drainage** (all artificially deepened natural channels): Compartments 3, 9, 14b.
- **Trampling** (exacerbating erosion): Compartments 5a, 29.
- **Burned** (leading to erosion): Compartments 7, 9, 13.
- **Proposed Infrastructure** (at or nearby the Compartment) that requires some further consideration: Compartments 7, 9, 10, 11, 12, 15, 16, 17, 22, 25, 29.



Near Natural bog with abundant *Sphagnum*. The bright green in the centre is *S. fallax (recurvum)*. Less conspicuous around the margins is brownish-yellow *S. papillosum*. The red to the far centre on the higher,

slightly drier margin is the almost ubiquitous *S. capillifolium*, which also occurs on wet heath but here is joined in places by *S. papillosum* in hollows even away from the bog pools indicating a high water table and generally lower levels of disturbance.



Modified bog. Here the terrain is only slightly hummocky and the water table remains fairly high. Though *Sphagnum* is abundant in places it is less conspicuous. There are few bog pools (none visible here) and where present *Sphagnum* is scarce or absent (usually confined to margins).



Highly Modified bog. The bare peat in the middle distance is conspicuous. However the raised hummocks dominated but *Racomitrium lanuginosum* moss with white *Cladonia* lichen showing within this also indicates a high level of modification as the hollows between them largely lack *Sphagnum*.

## **Compartment 1. NH 38321 20099**

### **1a**

#### **Condition**

Bog 95%. Near Natural 5%. Modified 80%, Highly Modified 15%

Abundant common *Sphagnum* species in places, with a relatively high water table except for area around a channel, which is eroding towards the lochan.

**Proposed Infrastructure:** None

### **1b. NH 38525 20254**

#### **Condition**

Bog 60%. Modified 60%, Highly Modified 40%.

A high water table with *Sphagnum* locally abundant but tending towards M25a marshy grassland dominated by purple moor-grass (*Molinia caerulea*) in places. Some localised micro erosion where water table has fallen.

#### **Proposed Infrastructure**

Hardstanding. At NH 38750 20300 between compartment 1b and Compartment 13 (roughly 150 metres from each). Sloping wet heath on shallow peat with clear signs of past burning and micro erosion. Of no significance.

## **Compartment 2. NH 38486 20641**

#### **Condition**

Bog 50%. Modified 50%, Highly Modified 50%.

A scattering of common *Sphagnum* species. Some indication of probable historic burning with large areas tending towards M15c wet heath particularly in the most Highly Modified northwest part. A small amount of erosion with bare peat to the east.

**Proposed Infrastructure:** None

## **Compartment 3. NH 38087 20399**



**Condition**

Bog 40%. Modified 70%, Highly Modified 30%.

Much of this compartment is M15 wet heath. Most of the bog lies in the east and southeast of the compartment the rest being sloping, naturally drained and grading into M15 wet heath above. In areas of deepest peat common *Sphagnum* species are abundant but hare's-tail cotton grass (*Eriophorum vaginatum*) is scarce. A natural channel to the north may have been artificially deepened in the past.

**Proposed Infrastructure:** None

**Compartment 4. NH 38091 20887****Condition**

Bog 50%. Modified 100%

Common *Sphagnum* species locally abundant but some areas tending towards M15c wet heath on hummocks. Wettest area by the burn is M25a marshy grassland.

**Proposed Infrastructure**

Hardstanding, roughly 200 metres to the northeast at NH 38290 21090. On sloping M15 wet heath. Of no significance.

**Compartment 5. NH 37900 21200**

Separated from Compartment 4 by an area dominated by M15 wet heath with M25a marshy grassland adjacent to the stream.

**5a****Condition**

Bog 100%. Modified 50%, Highly Modified 50%.

At the southern end around NH 37976 21136 the water table has dropped significantly. Though moderately *Sphagnum*-rich, bog pools are confined to hollows with erosion around margins. About 15% of this compartment shows signs of trampling. At NH 37916 21141 there is localised bare peat from erosion when the channel water level is high.

**Proposed Infrastructure:** None.

**5b****Condition**

Bog 70%. Modified 20%, Highly Modified 80%.

North and northwest area around NH 38036 21324 has a lowered water table with drier hummocks, species-poor M3 bog pools and localised erosion. Drier hummocks are tending towards M15c wet heath. (The remainder of the Compartment is M15c, some on very shallow peat.)

**Proposed Infrastructure:** None

## **Compartment 6. NH 38380 21587**

### **Condition**

Bog 50%. Modified 100%.

Approximately 50% of this compartment is M15 wet heath with small patches of dry heath in the east. The wettest areas (highest water table) are concentrated around NH 38385 21670 but even here bog (M17) is localised and modified.

### **Proposed Infrastructure**

Hardstanding. Should have little impact on areas of bog. Of no significance.

## **Compartment 7. NH 38242 21996**

### **Condition**

Bog 60%. Near Natural 5%, Modified 30%, Highly Modified 65%.

The compartment is almost bisected north to south by shallower peat supporting M15 wet heath. The area to the west of this is less modified but sloping towards the loch. The area to the east is much more modified with a general lowering of the water table with more raised areas tending towards M15c wet heath. The bog pools are all species-poor M3 with only common cotton-grass (*Eriophorum angustifolium*) and bare peat. Micro erosion is widespread suggesting that the area has been historically burned. At the point of the above grid reference there is an incised channel with eroding peat in places.

### **Proposed Infrastructure**

Hardstanding proposed at NH 382 221. Lies at the margin of the bog and will not have a direct impact. However, as it lies upslope it would be important to avoid any run-off (sediment etc.) that might pollute the bog.

## **Compartment 8. NH 39000 22000**

### **Condition**

Bog 60%. Modified 30%, Highly Modified 70%

Southeast beside the loch is the wettest part (highest water table) but in places is also highly modified with some incised, eroding channels with bare peat. In the west a large area is sloping and tending towards M15b wet heath. Purple moor-grass (*Molinia caerulea*) is locally abundant suggesting a tendency toward M25a marshy grassland.

NB. A patch of bog to the west of here at NH 38677 21926 is highly modified with deep, incised erosion of bare peat and a lowered water table.

**Proposed Infrastructure:** None

## **Compartment 9. NH 39349 21874**

### **Condition**

Bog 80%. Near Natural 20%, Modified 30%, Highly Modified 10%

Highly variable, with some areas showing a higher water table than others. However, though much of the compartment is affected to some extent by a lowering of the water table some areas remain with a high water table and abundant *Sphagnum* including bog pools. The area of deepest peat is around NH 39331 21801 and supports the least modified M2 bog pools. In the more Highly Modified area there is some indication of micro erosion, possible evidence for historic burning, which would have slowly led to the larger scale erosion. The greatest erosion occurs in the area to the east of grid reference NH 39360 21764, incised to a depth of around 80 centimetres with bare peat and species-poor M3 bog pools. No drains but the natural channels may have been artificially deepened in the past.

### **Proposed Infrastructure:**

Hard standing and Borrow Pit Search to the east of the compartment do not encroach on the bog. However, they lie up-slope and therefore care should be taken to prevent run-off that could pollute the bog.

## **Compartment 10. NH 39305 21551**

### **Condition**

Bog 60%. Modified 90%, Highly Modified 10%.

The western half and areas beside the loch are more sloping and tend to form a mosaic with around 60% M15 wet heath and 40% M17 bog. Within the bog common *Sphagnum* species are moderately abundant. In the northeast on the boundary with compartment 9 there is localised erosion with bare peat.

### **Proposed Infrastructure**

Hardstanding is adjacent to an area of eroded bog but situated on M15 wet heath. Exposed bedrock shows where peat is shallower, going suddenly deeper to the north.

This should make it a simple matter to fine tune the location of the Hardstanding to avoid what is some of the deepest peat in the area. However, being up slope care should be taken to prevent run-off that could pollute the bog.

## **Compartment 11. NH 38945 21478**

### **Condition**

Bog 60%. Modified 5%, Highly Modified 95%.

For the most part Highly Modified due to a deeply incised eroding channel running north to south with bare peat and exposed bedrock. As a result the southern half is predominantly M15c wet heath. The most intact bog is confined to the northern half of the compartment.

### **Proposed Infrastructure**

The proposed Hardstanding to the north lies just northwards of the most intact bog within this compartment.

The large area proposed for a Borrow Pit Search immediately to the west of this Compartment is for the most part on a very steep slope. Not only would access be difficult but any disturbance would be likely to create a large amount of erosion, all of it in the direction of the proposed Access Track and the bog. The Access Track itself lies up-slope from the Compartment and therefore care must be taken to prevent run-off that could pollute the bog.

### **To the south of compartment 11**

2 small stretches of M11 yellow saxifrage (*Saxifraga aizoides*) mire occur at NH 38899 21393 and NH 38844 21173. The former has only a small fragment of saxifrage remaining while the latter has a scattering stretching several metres from NH 38844 21173 down to NH 38879 21144. Locally scarce and an indicator of more calcareous conditions within a discreet area this can easily be identified as a stony flush with a scattering of sedges. Though an Access Track is proposed in this area it would be good to avoid these small patches if at all possible.

## **Compartment 12. NH 38926 20868**

### **Condition**

Bog 100%. Modified 60%, Highly Modified 40%.

The northeast section has a high water table but very little *Sphagnum* even in bog pools. Further south *Sphagnum* increases but only common species and the bog pools are species-poor M3. Towards the western margin the water table is substantially lower with incised, eroding channels with bare peat.



**Proposed Infrastructure**

- Borrow Pits Search lies to the North-northwest around NH 38700 21100. This is entirely on M15c wet heath and some distance from the Compartment, but up slope and therefore care should be taken to prevent run-off that could pollute the bog.
- Hardstanding around 100 metres to the southwest at NH 38700 20690 lies on a sloping mosaic of wet heath, dry heath and small purple moor-grass (*Molinia caerulea*) “flushes”. There are scattered fragments of poorly-formed bog but on shallow peat. Of no significance.

**Compartment 13. NH 39029 20183****Condition**

Bog 90%. Near Natural 30%. Modified 50%, Highly Modified 20%.

*Sphagnum* locally abundant with a high water table. Elsewhere micro erosion (possibly due to past burning) is exposing bare peat. Bare peat on channel sides towards the loch is also eroding (<5% of total area of bog). Compartment extends north on to shallower peat with a high water table and scattered *Sphagnum*.

**Proposed Infrastructure:** None.

**Compartment 14.****14a. NH 39559 20375****Condition**

Bog 10%. Modified 100%.

The majority of this area is M25a marshy grassland with a high water table, no erosion but lacking *Sphagnum*.

**Proposed Infrastructure:** None.

**14b. NH 39390 20551.****Condition**

Bog 80%. Modified 40%. Highly Modified 60%.

A lowered water table has left dry hummocks and species-poor M3 bog pools.

**Proposed Infrastructure:** None.

**14c. NH 39380 20700.**

**Condition**

Bog 70%. Modified 60%. Highly Modified 40%.

A lowered water table to the south has led to highly modified conditions. Elsewhere tending to M25a marshy grassland in places. *Sphagnum* locally abundant but only scattered within M25a where purple moor-grass (*Molinia caerulea*) dominates. Small areas (<5%) around the margins of bog pools have bare peat and are actively eroding. The north quarter of this compartment slopes eastwards with M15 wet heath and M25a marshy grassland (hence only 70% bog).

**Proposed Infrastructure:** None.

**Compartment 15. NH 39202 21106****Condition**

Bog 90%. Near Natural 5%, Modified 95%.

The least modified area lies to the west, close to where the Substation is proposed. *Sphagnum* is scattered throughout but almost entirely species associated with wet heath (*S. capillifolium* and a little *S. compactum*).

**Proposed Infrastructure**

Substation option at NH 3918 2110 would be partly on highly modified bog turning to M15c wet heath but also only slightly modified, Near Natural bog with a high water table and *Sphagnum*-rich including bog pools. Shifting the location 100 metres south or southwest would avoid the richest part of the bog. The other option at NH 3905 2089 or a point somewhere between these two locations also appear more suitable in terms of having much less impact on the bog and areas of deep peat.

**Compartment 16. NH 39350 21290****Condition**

Bog 100%. Near Natural 40%, Modified 60%.

A small outlier of adjacent bog. Relatively *Sphagnum* rich in places including a few bog pools.

**Proposed Infrastructure**

To the south. Batch Planting Search NH 3939 2125. Mostly M15 wet heath with only small patches tending towards bog. However, the area drains towards the richest part of the bog in compartment 16. (Does not encroach on bog but the area drains in that direction.) Therefore it would be necessary to avoid pollution from run-off.

## **Compartment 17. NH 39595 21049**

### **Condition**

Bog 90%. Near Natural 5%, Modified 90%, Highly Modified 5%.

Both the Near Natural and Highly Modified parts are within the area of deepest peat. The Highly Modified part has only localised *Sphagnum*, drier hummocks turning to M15c wet heath and drains westwards. Elsewhere *Sphagnum* is relatively abundant in places.

### **Proposed Infrastructure**

Hard Standing NH 39500 20960 lies on a mosaic of M15c wet heath with around 20% bog but not species-rich. The Access Track proposed to the north would be better to stay to the west, passing through the area of more degraded bog.

## **Compartment 18. NH 39590 21250**

### **Condition**

Bog 60%. Modified 80%, Highly Modified 20%.

Mostly a mosaic of M15 wet heath and bog in which *Sphagnum* is only locally abundant in the wetter parts. Bog pools are species-poor M3.

### **Proposed Infrastructure**

A small length of access track crosses the southern part of the Compartment but does not interfere with any particularly sensitive area. Of no significance.

## **Compartment 19. NH 3978021500**

### **Condition**

Bog 95%. Modified 80%, Highly Modified 20%

*Sphagnum* locally abundant but scarce in some places. Several small bog pools appear *Sphagnum* rich but otherwise the general area is species-poor. Drier parts in the northwest and to the east beside the lochan have hummocks indicating a lowering of the water table and tending towards M15c wet heath.

### **Proposed Infrastructure**

To the south of this Compartment at NH 39915 21390 Hardstanding is proposed. The area is an undulating mosaic of Highly Modified bog with hummocks supporting M15 wet heath. Exposed bedrock suggests that the peat here is generally shallow and therefore of little significance. Furthermore, the area drains away from the adjacent bog reducing the risk of run-off pollution. Of no significance.

## **Compartment 20. NH 39867 21806**

### **Condition**

Bog 70%. Modified 30%, Highly Modified 70%.

Sloping in places and therefore naturally drained. Partly as a result of this many areas of bog are tending towards M15 wet heath and therefore have been graded as Highly Modified. *Sphagnum* very localised, mainly concentrated near small bog pools.

**Proposed Infrastructure:** None

## **Compartment 21. NH 40135 21800**

### **Condition**

Bog 80%. Modified 30%, Highly Modified 70%.

North of lochan the area is sloping and mostly M15 wet heath. Elsewhere large parts are Highly Modified due to a lowered water table and sunken, species-poor M3 bog pools with bare peat at their margins. The resultant hummocks are becoming relatively dry M15c wet heath. Approximately 80% of the Highly Modified area is undergoing some form of erosion. The bog extends towards the shores of the lochan to the south where it becomes slightly less modified.

**Proposed Infrastructure:** None

## **Compartment 22. NH 40175 21300**

### **Condition**

Bog 75%. Highly Modified 100%.

Lowered water table has created hummocks, most of which are drying and approaching M15c wet heath. *Sphagnum* is scarce over large areas and the bog pools are species poor M3.

### **Proposed Infrastructure**

To the south at NH 40073 21276. Borrow Pits Search. Essentially part of this Compartment that has been overwritten on the map. The area of this grid reference is the least modified with a high water table and abundant *Sphagnum*. Immediately to the southwest it becomes highly modified with hummocks and tending towards wet heath. Any material taken from this area would be mostly peat of little use for construction and releasing carbon. To the south the topography steepens and there is very little bog. If borrow pits are required the latter area would be more suitable.

### **Compartment 23. NH 39726 20796**

#### **Condition**

Bog 95%. Near Natural 10%, Modified 90%.

The northern bulge in this Compartment has a high water table and areas where *Sphagnum* is locally abundant including bog pools with abundant *S. fallax (recurvum)* and other species. Though some hummocks occur, indicating a lowering of the water table in places, some parts have been classed as Near Natural due to the above. South of the loch *Sphagnum* is more scattered and the area more modified. A raised area in the southwest corner supports M15c wet heath, the reason why the Compartment is not 100% bog.

**Proposed Infrastructure:** None

### **Compartment 24. NH 40000 20750**

#### **Condition**

Bog 5%. Modified 100%.

This compartment is predominantly M15 wet heath on shallow peat with exposed bedrock.

#### **Proposed Infrastructure**

Hardstanding. The wet heath here is not ecologically sensitive. Of no significance.

### **Compartment 25. NH 40400 21395**

#### **Proposed Infrastructure**

This area is designated Borrow Pits Search but has been listed as a Compartment as it supports an area of bog, which requires clarification.

Bog 10%. Modified 70%, Eroding 30%.

*Sphagnum* confined to wetter areas adjacent to bog pools, but most pools are species-poor M3, some with eroding peat at the margins. The bog and hence the deepest peat lies to the south of the small lochan. Therefore any "borrowing" should avoid this area.

### **Compartment 26. NH 40400 21740**

#### **Condition**

Bog 60%. Highly Modified 100% (30% eroding).

*Sphagnum* is confined to the edge of the otherwise species-poor M3 bog pools, some of

which have eroding peat at their margins.

**Proposed Infrastructure:** None

### **Compartment 27. NH 40400 22000**

**Condition**

Bog 80%. Modified 95%, Highly Modified 5%.

High water table in places but *Sphagnum* patchy and bog pools species-poor M3. Water table lower in the west with incised pools with eroding bare peat margins.

**Proposed Infrastructure:** None

### **Compartment 28. NH 40898 21932**

**Condition**

Bog 70%. Modified 30%, Highly Modified 70%.

Sloping and draining towards the main south-flowing channel. Abundant hummocks with a low water table. Much of the area is approaching M15c wet heath. *Sphagnum* generally sparse and the few bog pools are all species-poor M3. The bog is concentrated adjacent to the lochan and beside the north to south flowing stream. Elsewhere only small patches occur.

**Proposed Infrastructure**

Hardstanding. On wet heath and well clear of the bog. Of no significance.

### **Compartment 29. NH 40800 21150**

**Condition**

Bog 60%. Modified 60%, Highly Modified 40%.

The highest water table occurs to the northwest beside the loch but *Sphagnum* is patchy and the bog pools are all species-poor M3. The area of deepest peat around NH 40712 21103 has the lowest water table and parts are Highly Modified with sunken M3 bog pools with bare peat at the margins and some areas forming gullies and clearly eroding. There are signs of deer trampling throughout.

**Proposed Infrastructure**

Access Track. Cuts through the area of most heavily eroded bog. Of no significance beyond direct disturbance to peat. (See Discussion below relating to mitigation.)

### **Compartment 30. NH 40900 21220**

#### **Condition**

Bog 10%. Modified 10%, Highly Modified 90%.

A mosaic of wet heath and Modified and Highly Modified bog in which M15 is dominant and the bog is on sloping ground and mostly poorly formed.

#### **Proposed Infrastructure**

Hardstanding. Lies on wet heath well clear of any patches of bog. Of no significance.

### **Compartment 31. NH 40677 20322**

#### **Condition**

Bog 100%. Near Natural 30%, Modified 50%, Highly Modified 20%.

The north end and central parts within the area of deepest peat support areas that are Near Natural with a high water table and abundant *Sphagnum*. The most modified part is towards the southern margin where the topography is slightly raised, gently sloping and therefore more drained. Here the water table is lower with drier hummocks. The majority of the area was probably once a lochan as parts appear to be in a relatively early stage of succession towards bog.

**Proposed Infrastructure:** None

### **Compartment 32. NH 40850 19900**

#### **Condition**

Bog 60%. Highly Modified 100%.

The bog is confined to raised, more drained areas with a lower water table. In places common *Sphagnum* is locally abundant. The driest parts are eroding with drier hummocks tending to M15c wet heath. The area is eroding towards the main river channel with bare peat in meandering, incised channels with a few species-poor M3 bog pools. Much of the remainder of the compartment is tending towards M25a marshy grassland.

**Proposed Infrastructure:** None

## Summary of Assessment

### 1. *Sphagnum* moss cover

This is directly related to the level of the water table. A high water table provides opportunities for less common species to colonise whereas a lower water table limits both the extent of cover and the species to be found. For the most part the only species found in any abundance was *S. capillifolium*, a species that can also be found on wet heath. The main exception was where M2 bog pools were found, with *Sphagnum fallax (recurvum)* and to a much lesser extent *Sphagnum cuspidatum*. *Sphagnum papillosum* was also found to be a conspicuous indicator that slightly less common species were present and hence the area was approaching Near Natural.

### 2. The presence of bare peat

For the most part bare peat was confined to the sides of species-poor M3 bog pools and a few deeper channels. The surface area was usually too small to record as a percentage of the bog. Micro erosion, whereby wind and precipitation act on small patches exposed through loss of *Sphagnum* (usually the result of burning) was noted wherever found in abundance but was otherwise too difficult to quantify as a percentage of the total area.

### 3. Drainage

Though no artificial drainage channels were found, in some places it appeared that natural channels might have been artificially deepened in the past. Where found this was noted.

### 4. Burning

Though no signs of recent burning were found it seems highly likely from the condition of most of the bogs that burning has occurred in the past. The evidence for this historic burning is secondary (in that no actual burned vegetation remains) in the form of peat loss and erosion, commencing with micro erosion and going on to the presence of conspicuous incised channels with bare peat. This was recorded where found.

### 5. Grazing and trampling

Deer signs were widespread. However, grazing was not particularly evident and trampling was only noted where it was clearly leading to a degree of erosion. However, it seems highly likely that levels were much higher in the past.

### 6. Peat loss

Though widespread this was normally in the form of hummock and hollow terrain, with the higher, drier parts tending to wet heath and the lower parts sometimes still retaining some semblance of a bog. In some places micro erosion was evident, but larger, deeper channels with bare peat were generally localised, usually approaching bog margins.

From this it the following assessments were made:



### **1. Near Natural**

9 Compartments supported Near Natural areas (ranging from 5% to 40%). This was normally only a small percentage of the total area of bog. All of these were Near Natural in the sense of being much less modified (this classification being used to place emphasis on this fact). However, when compared with bogs elsewhere that are designated Sites of Special Scientific Interest (SSSIs) and truly approaching a natural condition none of the bogs on the site came close to this.

### **2. Modified**

32 Compartments supported Modified areas (ranging from 5% to 100%). These areas were considered to be still functioning as a bog, with actively growing *Sphagnum* and the laying down of peat. The significance of designation as being simply Modified needs to be taken in context, particularly where the percentage is low. If the Compartment also supports a relatively high percentage of Near Natural bog then the low percentage of Modified bog is a positive sign. (Compartments 9, 13, 16 and 31.) However, if the majority is Highly Modified it is of course a negative (Compartments 2, 5a, 5b, 7, 8, 11, 14b, 20, 21, 22, 28, 30, 32). That being the case the percentage of Modified in itself is of much less significance than the percentages of Near Natural and Highly Modified.

#### **Highly Modified**

27 Compartments supported Highly Modified bog (ranging from 5% to 100%). This was used to denote degraded areas, large parts of which were no longer functioning as an active bog. This was usually in the form of a hummock and hollow terrain where the drier hummocks tend to be turning towards wet heath. The sunken hollows (sinking as the water table falls and erosion occurs) can still support areas of functioning bog, but more frequently they contain species-poor bog pools and bare, eroding peat. Where this erosion is pronounced clear channels are formed and the rate of erosion increases further.

### **3. Drained**

No Compartments showed signs of artificial drainage except possibly in the historic artificial deepening of natural channels within Compartments 3, 9 and 14b. The significance is that artificial drains are usually easier to fill in using peat removed from elsewhere during the course of infrastructure construction. Otherwise dams tend to be more suitable, which is the case on this site.

### **4. Actively Eroding**

Some parts of virtually all Compartments were actively eroding. Where pronounced this was noted as Highly Modified. Other areas tended to be more discreet, normally towards the margins. Micro erosion was noted where conspicuous (Compartments 1b, 7, 9, 13).

## **Implications for Proposed Infrastructure**

Compartments 7, 9, 10, 11, 12, 15, 16, 17, 22, 25 and 29 have notes that indicate that some thought should be given to the infrastructure proposed in or close to that area. For the most part this is a matter of avoiding run off onto a nearby bog that could cause further modification and nowhere is it at a scale that would require a major rethink. In terms of biodiversity nowhere was there any indication of rare or sensitive species or plant communities. However, it is important to remember that any development on peat of any depth will lead to the release of a certain amount of CO<sup>2</sup> into the atmosphere. On an active bog there will be the additional impact of rendering it inactive (essentially non-existent at that point). In other words it will no longer be able to sequester carbon and this could theoretically be calculated not only as area but as volume over time indefinitely.

## Reference

JNCC. *Guidelines for the selection of biological SSSI's. Part 2: Detailed guidelines for habitats and species groups.* Chapters 8 bogs and 9 upland habitats:

<http://data.jncc.gov.uk/data/20534790-bb45-4f33-9a6c-2fe795fb48ce/SSSIs-Chapter08.pdf>

<http://data.jncc.gov.uk/data/c1773745-b067-4f74-bbc4-83e942807247/SSSIs-Chapter09.pdf>.

Rodwell, J.S. (ed) *et al.* (1991 – 2000) *British Plant Communities* (5 volumes) CUP

Scottish Environment Protection Agency (2014) *Land Use Planning System SEPA Guidance Note 4; planning advice on windfarm developments*

<http://www.sepa.org.uk/media/136117/planning-guidance-on-on-shore-windfarms-developments.pdf>  
(This relates to GWDTE.)

The Heather trust (*et. al.*) *Peatland Condition Assessment.*

<https://www.nature.scot/sites/default/files/2017-10/Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf>

## List of NVC plant communities mentioned

M2 *Sphagnum cuspidatum/fallax* (formerly *S. recurvum*) bog pool community.

M3 *Eriophorum angustifolium* bog pool community.

M11 *Carex demissa-Saxifraga aizoides* mire

M15 *Trichophorum cespitosum (germanicum)-Erica tetralix* wet heath

M15b Typical sub-community

M15c *Cladonia* spp. sub-community

M17 *Trichophorum cespitosum (germanicum)-Eriophorum vaginatum* blanket mire

M17b *Cladonia* spp. sub-community

M25 *Molina caerulea-Potentilla erecta* mire

M25a *Erica tetralix* sub-community

Map: Peat Depth with numbered survey Compartments



## Sarah Tullie

---

**From:** Matt Burnett [REDACTED]  
**Sent:** 22 January 2021 17:09  
**To:** Sarah Sanders  
**Cc:** [REDACTED] Roy Ferguson; Cunningham, Craig; Macdonald, Jane; Rafe Dewar  
**Subject:** RE: Bhlaraidh Extension Wind Farm - Technical Note: Response to SNH Scoping Comments

Hi Sarah,

Thank you for your email below and apologies for the delay in getting back to you.

We agree the survey gaps highlighted in your report due to the lockdown restrictions will not prevent an impact assessment being undertaken.

With regards to the Slavonian grebe our previous advice remains unchanged with regard to SPA connectivity.

Kind regards,  
Matt

---

**From:** Sarah Sanders [REDACTED]  
**Sent:** 03 December 2020 15:33  
**To:** Matt Burnett [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension Wind Farm - Technical Note: Response to SNH Scoping Comments

Good Afternoon Matt,

Thank you for providing the response detailed below. As suggested, two years of baseline surveys have now been completed at Bhlaraidh Extension Wind Farm. The attached letter details the extent of baseline surveys (including any limitations as a result of Covid-19 restrictions) along with further information with regards Slavonian grebe.

Many thanks

Sarah

Please note:

My mobile number has been replaced with [REDACTED], if I am unavailable it will revert to the office main line where a colleague will take a message.

Working hours will usually be between 0730 and 1630.

Sarah Sanders

[REDACTED]  
www.macarthurgreen.com

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---

**From:** Matt Burnett [REDACTED] >

**Sent:** 10 January 2020 17:32

**To:** Cunningham, Craig [REDACTED]

**Cc:** McFadden S (Stephen) [REDACTED]

**Subject:** [EXTERNAL] RE: Bhlaraidh Extension Wind Farm - Technical Note: Response to SNH Scoping Comments

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

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Hi Craig,

Thanks for your email and apologies for the delay in getting back you, key member of staff we on leave over the festive period which delayed our conclusions on your technical note.

Slavonian Grebe are an exceptionally rare species in Scotland and are as qualifying features of the internationally important nearby Special Protection Areas. Slavonian Grebe have been recorded as breeding within 400m of the proposed boundary of Blairaidh Wind Farm Extension. The suggestion that interaction with the proposed wind farm can be excluded at this stage is something we disagree with. Further information on the tests and legislation which applies to Special Protect Areas is available on our website. We therefore remain of the view that there is a likely significant effect with the Loch Knockie and nearby Lochs SPA and North Inverness Lochs SPA. An appropriate assessment will therefore be required.

While we appreciate there is data covering nearby areas and this provides some context, due to the numerous sensitive species including those connected to international designations we do not agree that it is appropriate to undertake less than the minimum number of surveys described in the guidance. We therefore require that two years of surveys covering the suite set out in the guidance are required for this site.

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

Scottish Natural Heritage | Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: [REDACTED]

Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT  
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**From:** Cunningham, Craig [REDACTED]

**Sent:** 08 January 2020 09:23

**To:** Matt Burnett

**Subject:** Bhlaraidh Extension Wind Farm - Technical Note: Response to SNH Scoping Comments



Hi Matt,

Happy new year to you and all the best for 2020.

My colleague Alasdair Wilson submitted a Technical Note from our ornithological consultant MacArthur Green in mid-November providing some additional information and commentary in response to SNH's Scoping Opinion comments on our proposed ornithological survey and assessment methodologies for Bhlaraidh Extension. Can I press for a further response from SNH to the Technical Note as soon as possible, and, if a meeting is preferred to discuss further we would be more than happy to attend. We have continued with 2019-2020 wintering bird surveys to ensure no data gaps however we do believe we have set out a good justification for the survey programme set out in the Scoping Report and would like to understand SNH's stance after consideration of the Technical Note as soon as this is possible.

If there is anything that else that we can provide to allow further consideration please let me know.

Many thanks,  
Craig



**Craig Cunningham**

Project Manager

Capital Projects

M: [REDACTED]

E: [REDACTED]

1 Waterloo Street, Glasgow, G2 6AY, UK

[www.sse.com](http://www.sse.com)



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From 1 May 2020, SNH will be rebranding and changing its name to NatureScot.



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Tha am post-dealain seo agus fiosrachadh sam bith na chois dìomhair agus airson an neach no buidheann ainmichte a-mhàin. Mas e gun d' fhuair sibh am post-dealain seo le mearachd, cuiribh fios dhan manaidsear-sìostaim no neach-sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothai ch, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

\*\*\*\*\*

**NatureScot is the operating name of Scottish Natural Heritage.**



E-mail: [REDACTED]

Date: Thursday, 03 December 2020

Sent via email to [REDACTED]

cc: Stephen McFadden [REDACTED], Roy Ferguson [REDACTED]  
Craig Cunningham [REDACTED] Jane MacDonald [REDACTED]

Dear Matt,

**Bhlaraidh Wind Farm Extension: ongoing consultation with NatureScot with regards to ornithology.**

Thank you for commenting on the Technical Note (sent November 2019) sent regarding the ornithological baseline and Slavonian grebe. Further to the response received on 10 January 2020, MacArthur Green have provided further comment (Annex A). In summary:

- As recommended, two years of baseline ornithology surveys were undertaken. Annex A contains a summary of the timeframe the baseline data was gathered across and also a summary of the potential limitations of the nationwide Covid-19 lockdown on the baseline data.
- It is confirmed that Slavonian grebe will be scoped in to the ornithological impact assessment with impacts considered in the context of their regional/ Natural Heritage Zone and/or national population as applicable.
- It continues to be considered unlikely that there is any connectivity between the North Inverness Lochs SPA and Loch Knockie and nearby Lochs SPA and the development, however it is confirmed that the EIA Report will include all relevant available information to allow the competent authority, if required, to undertake an Appropriate Assessment.

Please also note: we are aware that NatureScot's recent guidance (September 2020<sup>1</sup>) included advice with regards to lighting on turbines over 150m to tip and assessment of possible effects of lighting on birds, this will also be taken into consideration in the assessment.

Yours sincerely,



Sarah Sanders

Senior Ornithologist

MacArthur Green is helping to combat the climate crisis through working within a carbon negative business model. Read more at [www.macarthurgreen.com](http://www.macarthurgreen.com).



<sup>1</sup> NatureScot (2020) General pre-application and scoping advice for onshore wind farms.

## ANNEX A.

### Introduction

This document, on behalf of the Applicant (SSE Renewables), addresses NatureScot's comments relating to ornithology in their response email (to Craig Cunningham, dated 10 January 2020) to the Applicant's Technical Note sent to them on November 2019. In the section below, NatureScot comments are in **bold** text and the response from MacArthur Green is in plain text.

### NatureScot (10 January 2020)

#### Slavonian Grebe

Slavonian Grebe are an exceptionally rare species in Scotland and are as qualifying features of the internationally important nearby Special Protection Areas. Slavonian Grebe have been recorded as breeding within 400m of the proposed boundary of Blairaidh Wind Farm Extension. The suggestion that interaction with the proposed wind farm can be excluded at this stage is something we disagree with. Further information on the tests and legislation which applies to Special Protect Areas is available on our website. We therefore remain of the view that there is a likely significant effect with the Loch Knockie and nearby Lochs SPA and North Inverness Lochs SPA. An appropriate assessment will therefore be required.

As a result of breeding activity within 1km of the development, Slavonian grebe will be scoped in to the ornithological impact assessment with impacts considered in the context of their regional/ Natural Heritage Zone and/or national population as applicable.

Based on information previously presented to NatureScot in the Technical Note and from sources including the review in the Druim Ba Environmental Statement, it is considered unlikely that there is any connectivity between the two SPAs and the development due to the separation distance (6.7km south and 7.7km north west) and distribution of breeding lochs in the area. It is however confirmed that the EIA Report will include all relevant available information<sup>2</sup> to allow the competent authority, if required, to undertake an Appropriate Assessment.

#### Baseline Survey Timescales

While we appreciate there is data covering nearby areas and this provides some context, due to the numerous sensitive species including those connected to international designations we do not agree that it is appropriate to undertake less than the minimum number of surveys described in the guidance. We therefore require that two years of surveys covering the suite set out in the guidance are required for this site.

Noted. The following baseline surveys for ornithology were continued across the 2019/2020 non-breeding and 2020 breeding season to achieve two years of baseline ornithology surveys:

<sup>2</sup> It should be noted that given the sensitivity of the species some of this information may be in a confidential appendix/only shown on confidential figures, however the ornithology chapter itself will not be confidential and an appropriate high-level summary of any detailed confidential information will be included in the chapter.

- Flight activity surveys: October 2018 to August 2020.
- Scarce breeding bird surveys, within the site plus a 2km buffer: February to August 2019 and February to August 2020.
- Black grouse surveys, within the site plus a 1.5km buffer: April/May 2019 (surveys in 2020 were not undertaken due to access restrictions relating to Covid-19 – see below for details).
- Breeding bird surveys, within the site plus a 500m buffer: April to July 2019 and May to July 2020 (surveys in April 2020 were not undertaken due to access restrictions relating to Covid-19 – see below for details).
- Winter walkover surveys, within the site plus a 500m buffer: November and December 2018, February and November 2019, January and February 2020.

The UK wide Covid-19 lockdown was implemented on 23<sup>rd</sup> March 2020 and access to the site (which is via the operational Bhlairaidh Wind Farm) was suspended. Consequently the 2020 breeding season surveys at the site (which were already underway from early March<sup>3</sup>) were also suspended from the 23<sup>rd</sup> March until the 20<sup>th</sup> May 2020. Prior to surveys recommencing, MacArthur Green developed guidance for field surveyors in consultation with SSE Renewables and in line with all available guidance at that time from the Scottish and UK Governments, NatureScot, CIEEM etc. Crucially for the proposed development, upon restarting on the 20<sup>th</sup> May 2020, surveys were able to continue due to the presence of local ornithologists who could travel individually to the site within approximately 1.5 hours without the need for overnight stays.

Although there were no surveys between 23<sup>rd</sup> March and 20<sup>th</sup> May 2020, this gap is not considered to be a significant limitation to allow a robust assessment for the reasons outlined per survey type below.

- Flight activity surveys: the recommended minimum of 36 hours survey effort per vantage point (VP) was still achieved for each VP during the 2020 breeding season.
- Scarce breeding bird surveys: whilst there is some potential for breeding activity to have been missed in April, the key species known to be present at the site are likely to have been adequately surveyed due to the reasons outlined below.
  - Golden eagle: early breeding season surveys were completed in February and March 2020, with surveys then continuing as planned from May to August 2020. Considering that 2020 was the second year of surveys (with four alternative eyries within the territory already known to surveyors), the lack of surveys in April is not likely to have resulted in any missed breeding attempts.
  - Slavonian grebe: survey timings to check for breeding activity are defined by Gilbert *et al.* (1998<sup>4</sup>) as a first visit in late May with a second visit in July. Consequently, the lack of April surveys is not considered to be a limitation.

<sup>3</sup> February for golden eagle.

<sup>4</sup> Gilbert, G., Gibbons, D. W. and Evans, J. (1998) Bird Monitoring Methods. RSPB, Sandy.

- Black-throated diver: survey timings to check for breeding activity are defined by Gilbert *et al.* (1998<sup>4</sup>) as two or more visits between 23<sup>rd</sup> April and 23<sup>rd</sup> July. Consequently, whilst there may have been some very early breeding attempts that failed prior to surveys restarting on 20<sup>th</sup> May 2020, given the presence of multiple previous years of diver breeding data (from 2019 surveys and baseline surveys from the now operational Bhlaraidh Wind Farm), the lack of April surveys is not considered to be a limitation.
- Red-throated diver: survey timings to check for breeding activity are defined by Gilbert *et al.* (1998<sup>4</sup>) as a first visit in late May/early June with a second visit in July. Consequently, the lack of April surveys is not considered to be a limitation.
- Breeding bird surveys (waders): breeding bird surveys in 2020 comprised of three complete visits (May, June and July) rather than the recommended four visits between April and July (SNH 2017**Error! Bookmark not defined.**). Whilst it is acknowledged that the lack of surveys for breeding waders in April may have resulted in missing any early failed breeding attempts by waders, given the data available from 2019, and the baseline surveys for the now operational Bhlaraidh Wind Farm, this is not expected to affect the robustness of the assessment. Furthermore, the site is located at between 400m and 580m elevation in the Scottish Highlands, and so whilst breeding wader activity may have commenced in April, it is likely that May/June represent the peak of activity.
- Black grouse: SNH (2017**Error! Bookmark not defined.**) survey guidance recommends that surveys are undertaken in April and May for black grouse. As access was not permitted until 20<sup>th</sup> May 2020, the decision was taken to prioritise the breeding bird, scarce breeding bird and flight activity surveys in the remaining 12 days of May 2020 and as a result no black grouse surveys were undertaken in 2020. However, considering that black grouse data are available for the site from 2011, 2015, 2018 and 2019, and that distribution is well known, the data available is considered to be representative of black grouse activity at the site.

**Sarah Tullie**

---

**From:** Nadine Little [REDACTED]  
**Sent:** 22 April 2020 16:30  
**To:** Matt Burnett  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Wind Farm Extension Bat Data  
**Categories:** Bhlaraidh

Hi Matt,

Many thanks for your response regarding the Bhlaraidh Wind Farm Extension and for confirming no further bat surveys are required. The survey results were based on the detectors recording for the entire duration of the deployment dates.

I'll make sure I direct any future correspondence to you but please let me know if you need anything else from me in the interim.

Best regards,

**Nadine Little ACIEEM MSc BVM&S**

Senior Ecological Consultant  
1621784 – Ecosystem Solutions

M [REDACTED]  
[REDACTED]

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**From:** Matt Burnett [REDACTED]  
**Sent:** 22 April 2020 14:50  
**To:** Nadine Little [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Wind Farm Extension Bat Data

Dear Nadine,

Thank you for getting in touch regarding Bhlaraidh Wind Farm Extension. Please direct future correspondence on Bhlaraidh Wind Farm to myself.

We have reviewed the bat survey report you have provided us with.

With regards to the survey effort we note that the minimum requirements of the bat survey guidance have not been met, both in terms of the duration of surveys (2 days rather than the minimum required 10 for spring season) and in

terms of the minimum number of detectors deployed (at times 7 rather than the minimum required 14). However given the nature of the site, the survey results and our understanding of the area we agree that no additional bat surveys are required to inform the EIA report.

Could you please provide clarification with regards to the actual number of days the detectors were operational? The report notes deployment dates, e.g. 30<sup>th</sup> May to 25<sup>th</sup> June, were the survey results based on detectors recording for the entire duration of these deployment dates?

Kind regards,  
Matt

**Matt Burnett | Renewable Energy Casework Adviser**

Scottish Natural Heritage | Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: [REDACTED]  
Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT  
[nature.scot](http://nature.scot) – Connecting People and Nature in Scotland - [@nature.scot](mailto:@nature.scot)

**\* tha seòladh puist-d ùr agam / I have a new email address – [REDACTED] \***

All SNH email addresses have changed to a new format: [REDACTED]

---

**From:** Nadine Little [REDACTED]

**Sent:** 24 March 2020 09:42

**To:** [REDACTED]

**Subject:** Bhlaraidh Wind Farm Extension Bat Data

Dear Liz,

I'm writing on behalf of SSE Renewables Developments (UK) Ltd for the proposed Bhlaraidh wind farm extension near Invermoriston in the Highlands. Ramboll have been involved in the ecology work, including the collection of habitat and protected species data. We are seeking confirmation from SNH on the suitability of our bat survey effort and the gathered data in terms of undertaking an Environmental Impact Assessment. Please see the attached letter for full details of the survey methodology and results of a programme of static bat surveys undertaken between May and October 2019. I appreciate this is a time of uncertainty due to the recent change in working practices following the government's recent announcement on coronavirus measures but would it be possible to have a response from you by mid-April?

Thank you for your time. I look forward to hearing from you.

Best regards,

**Nadine Little ACIEEM MSc BVM&S**

Senior Ecological Consultant  
1621784 – Ecosystem Solutions

M [REDACTED]  
[REDACTED]

---

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From 1 May 2020, SNH will be rebranding and changing its name to NatureScot.



## Ness District Salmon Fishery Board / Ness & Beaully Fisheries Trust

## Sarah Tullie

---

**From:** Chris Conroy [REDACTED]  
**Sent:** 20 May 2020 12:05  
**To:** 'Jon Watt'  
**Cc:** Roy Ferguson; 'Craig Cunningham'; 'Carolyn Wilson'  
**Subject:** RE: Bhlaraidh wind farm extension

**Categories:** Bhlaraidh

Hi John

Many thank for consulting me - I can confirm that we are happy with the comprehensive fish survey specification for the EIAR/Environmental Statement.

Looking ahead to post consent monitoring, it would be advisable to include an additional survey site further down the Allt Saigh at its confluence with Loch Ness. We suspect that the accessible reaches in this area may be utilised by spawning salmon and ferox trout. Likewise, an addition site on the River Moriston would be advisable given its importance for salmon and freshwater pearl mussel.

Hope this makes sense.

All the best

Chris

---

**From:** Jon Watt [REDACTED]  
**Sent:** 20 May 2020 09:14  
**To:** [REDACTED]  
**Subject:** Bhlaraidh wind farm extension

To: Chris Conroy, Director, Ness District Salmon Fishery Board/Ness & Beaully Fisheries Trust

Re: Bhlaraidh Wind Farm, proposed extension

Chris

You will be aware of the proposed extension to the Bhlaraidh Wind Farm, near Invermoriston. A turbine layout is included as an Appendix in the attached document and further details can be found at the Energy Consent Unit website.

SSE and the lead consultant, ITP Energised, have asked Waterside Ecology to prepare a fish survey specification for the site. The survey would be conducted to provide information on fish in support of the Environmental Impact Assessment Report for the site.

A proposed survey design is attached. Marine Scotland Science has requested that the developer contact the local Fishery Board and Trust to ensure that any fish survey best reflects local knowledge and the needs of local fishery management organisations. I'd be very grateful, therefore, if you could cast an eye over the attached and let me know whether:

- a) It is likely to satisfy the Board's/Trust's expectations in relation to fish data for the EIAR/Environmental Statement for the Bhlaraidh the site; and
- b) The Board and Trust consider that any changes or additions are required to the proposed specification.

The rationale behind the proposal is set out in the attached, but if anything is unclear or you'd like to talk it over, feel free to give me a ring.

Thanks and best wishes

Jon

Dr Jon Watt  
Waterside Ecology  
Druimindarroch, Arisaig, Inverness-shire, PH39 4NR  
T: [REDACTED] M: [REDACTED]



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## PDG Aviation

From: [REDACTED] <[REDACTED]@pdgaviation.com>  
To: Malcolm Spaven [REDACTED]  
Subject: RE: Wind turbine lighting schemes  
Date: Mon, 24 May 2021 10:47:33 +0000

Good morning Malcolm,

Thank you for keeping me informed on this issue.

As discussed in our phone call this morning, PDG rarely conducts night flying operations, and night flights are all flown in VFR and generally greater than 1500' AGL, so the proposed lighting scheme on this wind farm will have no adverse effect on our operations, and PDG have no objections.

Best regards,

[REDACTED]

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

From: Malcolm Spaven  
Sent: 25 February 2021 11:05  
To: [REDACTED] <[REDACTED]@pdgaviation.com>  
Subject: RE: Wind turbine lighting schemes

Dear [REDACTED]

You may recall our contacts about a year ago in relation to our work on developing reduced lighting schemes for wind farms with turbines exceeding 150m agl. I realise now, having looked again at the correspondence, that I singularly failed to deliver on my promise to send you copies of our various submissions - sincere apologies!

We have now had CAA approval for reduced lighting schemes at Clash Gour, south of Forres, and Garvary, near Lairg. I'll send you graphics showing the layout of those schemes under separate cover, for your information.

I'm contacting you again in relation to another wind farm lighting scheme. This is an extension of the existing wind farm at Bhlaraidh, north west of Invermoriston. Location map is attached.

The existing wind farm has 32 turbines with blade tips 135m agl. Since they're under 150m they are not required to have visible lighting. The lighting scheme on those turbines consists of infra-red lights only, on seven of the 32 turbines.

The proposed extension would be 18 x 180m tip height turbines located immediately to the east of the existing wind farm. The maximum tip heights amsl of the extension will be 2346ft, a little lower than the 2395 max tip heights of the existing turbines.

Because this is an extension of an existing wind farm which has only IR lights, and because the additional turbines will be no higher than the existing wind farm, we believe there is a case for extending that IR-lights-only scheme to cover the extension too - see attached

graphic. We have made initial submissions to the CAA to that effect but would value your views on the proposal.

Let me know if you require any further information.

Thanks again and best regards

Malcolm

Police Scotland

From: "[REDACTED]" <[REDACTED]@babcockinternational.com>

To: Malcolm Spaven <[REDACTED]>,  
"[REDACTED]" <[REDACTED]@babcockinternational.com>

Subject: Re: CAUTION: External email - Lighting scheme: Bhlaraidh Extension wind farm

Date: Sat, 27 Feb 2021 19:21:47 +0000

Hi Malcolm,

Yes all good here thanks, I trust you are well also...?

With regards this latest project, given that it is an extension of an existing windfarm, and is lower than the current turbines, I do not envisage any issues as far as the Police operation is concerned.

I'll let [REDACTED] revert back regarding the Babcock/SCAA Air Ambulance operations.

Regards,

[REDACTED]

[REDACTED]  
Unit Chief Pilot Police Scotland  
Mission Critical Services Onshore [Aviation]  
Babcock International Group  
Clyde Heliport | 16 Linthouse Road | Govan | Glasgow | G51 4BZ  
Telephone: [REDACTED] | Mobile: [REDACTED]  
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## Scottish Environment Protection Agency (SEPA)

**Sarah Tullie**

---

**Subject:** FW: 1350: Bhlaraidh Wind Farm Extension - Cross Country Cable Route

---

**From:** Planning.North <[REDACTED]>

**Sent:** 26 May 2021 13:10

**To:** Macdonald, Jane <[REDACTED]>

**Subject:** [EXTERNAL] 1350: Bhlaraidh Wind Farm Extension - Cross Country Cable Route

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OFFICIAL – BUSINESS

Dear Jane

Thank you for consulting SEPA further on the above windfarm extension in relation to the overland cable routes, an issue I did not pick up on in my attached response of 17 December 2020.

We would be unlikely to have any significant concerns regarding the two proposed lengths of cross country cable routes if the method of laying was relatively unobtrusive. I welcome the proposal for a ploughing method, but we would want to see slightly more confidence in the final submission that it would actually be achievable in these locations. I recommend that some consideration is given to the topography and soil/peat conditions on the route prior to the formal submission so that a better idea can be gained as to whether ploughing is likely to be used – and if its not, provide justification for the approach taken.

It is disappointing that its not possible to simply join the new turbines onto the existing cables. It would be good to see developers future-proofing initial applications so that they already have the ability to increase capacity at a later stage. This would save considerable environment impacts, especially since its not just that the new turbines cannot connect to the existing cables, but that the new cables also cannot be located within proximity to the existing cables, resulting in further disturbance.

Kind regards

Susan

Susan Haslam

Senior Planning Officer

SEPA Planning Service – [REDACTED] – telephone [REDACTED]

Please note I am not at work on Friday afternoons

SEPA was subject to a cyber-attack on Christmas Eve; further details on the impact this had on our work is available on our website - [Planning | Scottish Environment Protection Agency \(SEPA\)](#)

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**From:** Macdonald, Jane [REDACTED]

**Sent:** 10 May 2021 12:17

**To:** [REDACTED]  
[REDACTED]

**Subject:** Bhlaraidh Wind Farm Extension - Cross Country Cable Route

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

Hi Susan,

As discussed briefly on the phone last week, please see attached letter presenting our further consultation information on the proposed cross country cable routes.

I hope the letter contains all the information you need at present, but please do not hesitate to contact me if you require further details.

Kind regards,  
Jane.

**Jane MacDonald** CEnv MIEMA || Consent Manager

**SSE Renewables**

1 Waterloo Street  
Glasgow, G2 6AY

**T:** [REDACTED]  
**M:** [REDACTED]

[saserenewables.com](https://saserenewables.com)

Please note that I don't normally work on Fridays.



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

Susan Haslam  
Senior Planning Officer  
Planning Service, SEPA  
Graesser House  
Dingwall Business Park  
Dingwall  
IV15 9XB

**SSE Renewables**  
1 Waterloo Street  
Glasgow  
G2 6AY

10 May 2021

**Re: Proposed Cross Country Cable Routes,  
Bhlaraidh Wind Farm Extension**

**Dear Ms Haslam,**

Hi Susan,

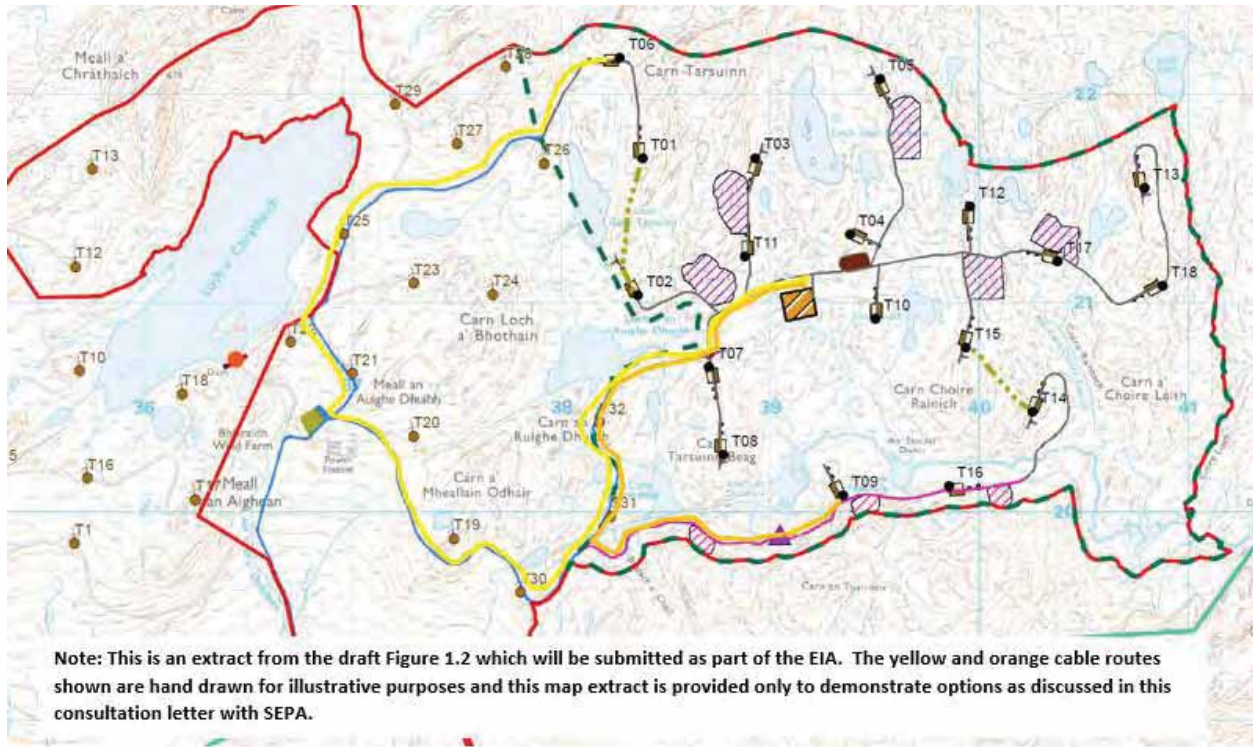
I am writing to provide you with additional consultation information on the proposed cross-country cable route at Bhlaraidh Wind Farm Extension.




This is provided as follow up to SEPA's responses to the scoping report (PCS/166651, 6th August 2019), which stated: *"The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required"*.

During the iterative design process, it was apparent that the option of taking cable routes across country at two locations would be preferable to laying cables alongside tracks on the existing wind farm. Hence our Gatecheck report in November 2020 stated *"following SSER experience at Gordonbush Extension wind farm, further consultation will take place regarding cabling options to be included in EIA Report"*.

As illustrated on the plans provided in our further consultation following the Gatecheck report (emails Jane MacDonald to Susan Haslam 11th December 2020), we are proposing to install approximately 700m of cross-country cable between Turbine 01 and Turbine 02 and approximately 450m of cross-country cables between T14 and T15.

The sketch below is provided here to further illustrate the points raised in this consultation letter:



-  Likely cable route from T01/ T06 to substation if cross country route was not possible
-  Likely cable route from T14, T16 and T09 to substation if cross country route was not possible.
-  Indicative Cross Country Cable Route

The justification for selecting the cross-country routes is summarised as follows:

1. The proposed cross-country cable routes have been selected as they result in the shortest distance and are unlikely to have a significant impact on any areas of sensitive habitats or species. This will be further assessed in the EIA and suitable mitigation will be proposed where necessary.
2. The extension cables cannot be joined onto the existing wind farm cables as, in order to minimise the amount of conductor material used in the cable, the cabling arrays are designed to meet the requirements of the existing site electrical capacity and so the cables are not rated to accommodate any new turbines.
3. Without the cross-country routes, the cabling from the T01 / T06 and T09, T16 & T14 turbine arrays would need to be routed via the existing wind farm infrastructure back to the substation (refer to yellow and orange sketched routes above). Installation beside the existing wind farm

track is problematic from a health and safety risk perspective (requiring outtages to ensure no risk to workers from live cables), but also from a construction perspective as the new cables cannot be laid within the same trench as the existing cables. While we would look to install any new cable in verges on the opposite side of the access track from the existing cables, if this was not possible (e.g. due to topography or other constraint), the new cables would need to be installed in virgin ground adjacent to the existing cable run, which results in a greater corridor of temporary ground disturbance, particularly given a likely minimum separation distance of 2m so as not to affect the existing cables.

4. The two cross-country route options substantially reduce the overall length of cable required, providing not just a significant cost saving but reduction in temporary land disturbance and also savings in construction time, materials (cables, copper, aluminium, concrete for jointing bays, bedding sand, tape) and transport. These benefits/savings have been very broadly estimated:
  - Approximately 23,400m<sup>2</sup> less temporary land disturbance;
  - 7.8km reduction in cabling length; and
  - Reduction in materials by approximately 2,570m<sup>3</sup> sand, 150m<sup>3</sup> concrete and 31.2km warning tape required in the cable bed and jointing bays.

It is proposed that the cross-country cables would be installed using a plough method where possible as this provide the least impact and temporary habitat disturbance. However, the method will be confirmed following ground investigation and detailed electrical design post-consent. As with other infrastructure micro-siting, we would like to propose that any planning condition be worded such that it provides the opportunity to agree any alterations to the proposed cross-country cable locations in order to optimise their routes following detailed design with respect to further minimising impacts as far as possible.

I hope that the information presented here is sufficient to demonstrate that the option to include the proposed cross-country cable routes in this application will provide environmental benefits which outweigh the alternative routes alongside existing tracks.

If you have any comments on any aspect presented above, please do get in touch, or I would be happy to arrange a virtual meeting to discuss further.

Yours sincerely,

**Jane MacDonald**  
Consents Manager



## Sarah Tullie

---

**From:** Planning.North [REDACTED]  
**Sent:** 17 December 2020 08:57  
**To:** Macdonald, Jane  
**Cc:** Greenwood, Alan; [REDACTED] Wilson, Carolyn; Turnbull, Louise M; Roy Ferguson; Cunningham, Craig  
**Subject:** [EXTERNAL] RE: Bhlaraidh Wind Farm proposal - Gatecheck report - SEPA consultation

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SEPA email response: PCS/174301

Dear Jane

Thank you for your comprehensive submission which I have now had time to consider. SEPA welcomes this continued pre-application engagement. Please consider the below issues (underlined so they are easier to find) prior to the submission of your application.

### **GWDTE**

Thank you for updating us on what further survey work has been undertaken and the consequences. We can confirm that we are content that the M15c is very unlikely to be groundwater dependant in this setting and need not be considered as a constraint to development. We note that areas of other M15 habitat are a significant distance from infrastructure.

A couple of small areas of M11 - which is potentially highly groundwater dependant – have been identified and the further information you provided on that aspect was helpful. We accept that the M11 is also not likely to be groundwater dependant in this setting, but it is a locally unusual wetland habitat and therefore warrants some protection. Please do show the location of these habitats on the final NVC and GWDTE maps. The southern “patch” seems to be more extensive so make sure the layout plan shows a small buffer between the end of the feature and the track and include in the GWDTE/wetland mitigation proposals for maintaining local drainage patterns.

In view of above we are content that a detailed qualitative GWDTE assessment is not required for this application.

I would encourage you to include two GWDTE figures in the final EIA Report – one showing potential GWDTE (as submitted now) and one with the M15c excluded, as that would help clearly demonstrate that GWDTE are not an issue.

### **Impacts on the water environment**

It's clear that buffers to watercourse have been taken into consideration in the design of the layout, which is very welcome. Where watercourses and related buffers need to be crossed then this has generally been done at a perpendicular angle, as we would like to see.

The existing track to the south is within the buffer for some of its length – however we are content that making use of this existing infrastructure is the better environmental option. I would encourage you to state somewhere in the submission that were existing tracks need to be upgraded and they are near watercourses the widening works will be carried out on the opposite side to the watercourse.

The borrow pit search area directly south of T12 is too close to the watercourse and we request that final area is clipped to the buffer. I note that this is an area where an amend is planned, which will partially address this issue.



There is also a proposed amendment north of T07 which would move the track into a buffer. If it results in an overall environmental improvement to the design and the risks to the watercourse are not thought to be especially high then it's likely to be acceptable to us.

### **Peat**

It's good to see that the peat on this site is generally shallow and avoiding deep peat is not a significant issue for this site.

Do make the proposed amendment of the track to the west of T06. Half of the T06 hardstanding is also on deep peat – please realigning it slightly to address this issue.

Do make the proposed amendment of the track to the east of T04. Some of the T04 hardstanding is also on deep peat – please realigning it slightly to address this issue.

Any good quality habitats that are thought to be activity sequestering carbon should also be protected from development.

### **Layout issues**

Thank you for explaining the reasoning for other layout elements that we queried. In view of the fact that the development will not have an impact on GWDTE, avoids deep peat and generally complies with watercourse buffers then we are content that these have been addressed as far as is necessary in this site specific case.

I hope all of above is helpful.

Kind regards

Susan

### **Susan Haslam**

Senior Planning Officer

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

Mobile: [REDACTED] email: [REDACTED]

Work Pattern: Full time Monday to Thursday + Friday morning

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---

**From:** Macdonald, Jane [REDACTED]

**Sent:** 11 December 2020 11:33

**To:** Haslam, Susan [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Bhlaraidh Wind Farm proposal - Gatecheck report - SEPA consultation

Dear Susan,

Please find attached letter containing information which I hope fulfils SEPA's expectations in terms of further consultation on design of the wind farm extension and also addresses the comments raised in your previous correspondence with Carolyn back in June. I will send the following maps (as referenced within the letter) separately to ensure file size does not exceed email limits:

1. NVC
2. GWDTE
3. Peat Probe – x2 maps
4. Extrapolated Peat Depth
5. Peat Probe Risk Rating

## 6. Hydrology

I'd be grateful if you could confirm once you have received all of the above and I look forward to your response. I'd also be very happy to have a call with you to discuss any aspect in more detail.

Kind regards,  
Jane.

**Jane MacDonald** cEnv MIEMA || Consent Manager

### SSE Renewables

1 Waterloo Street  
Glasgow, G2 6AY

M: [REDACTED]

sserenewables.com



---

**From:** Haslam, Susan <[REDACTED]>  
**Sent:** 19 November 2020 17:22  
**To:** Macdonald, Jane <[REDACTED]>

**Subject:** [EXTERNAL] RE: Bhlaraidh Wind Farm proposal - Gatecheck report - SEPA consultation

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Hello Jane

Very nice to speak to you a couple of days ago. As long as SEPA has the opportunity to provide advice at a stage in the process whereby amendments can be made or further baseline information collected then I am happy with what is proposed. We still find ourselves, for example, objecting to applications due to a lack of peat probing or impacts on deep peat and would much rather work with the developer at the pre-application stage to avoid this if at all possible.

Kind regards

Susan

### Susan Haslam

Senior Planning Officer  
Planning Service, SEPA, Graesser House, Dingwall Business Park, Dingwall IV15 9XB  
Mobile: [REDACTED] email: [REDACTED]  
Work Pattern: Full time Monday to Thursday + Friday morning

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---

**From:** Macdonald, Jane [REDACTED]  
**Sent:** 17 November 2020 16:49  
**To:** Haslam, Susan [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Wind Farm proposal - Gatecheck report - SEPA consultation

Hello Susan,

Good to speak with you earlier. I thought it would be good to follow up with a very brief confirmation of our discussions so that the rest of team are aware of your expectations and we can deliver accordingly:

We are aiming to complete a design workshop on the 1<sup>st</sup> December, with a subsequent walkover by the civil engineering team prior to design freeze. We are hoping to have a final design frozen by mid Dec, or at least this side of Christmas, so that the EIA consultants can start completing their assessments early in the new year.

I will provide the maps requested (peat depth, NVC and hydrology) following the workshop to allow comment from SEPA prior to formal design freeze so that we can address any concerns you may have.

Regards,  
Jane.

**Jane MacDonald** cEnv MIEMA || Consent Manager

**SSE Renewables**  
1 Waterloo Street  
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G2 6AY

**M:** [REDACTED]

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---

**From:** Wilson, Carolyn [REDACTED]  
**Sent:** 12 November 2020 16:28  
**To:** Haslam, Susan [REDACTED]  
**Subject:** RE: Bhlaraidh Wind Farm proposal - Gatecheck report

Dear Susan

Many thanks for your response below to the ECU regarding our Gatecheck Report on the Bhlaraidh Extension project, it is noted and very helpful. Since our discussions in June we have been completing our phase 2 peat probing and more recently further survey on peatland habitat condition to allow us to fully address all matters related to carbon rich soils, deep peat and peatland habitat and feed this into our

design evolution, we have also undertaken further hydrological site survey. We should therefore be in a position in the next month or so to share this further information with you and take further advice in advance of commencement of the EIA report.

I would like to take this opportunity however to introduce my colleague Jane Macdonald who is copied in to this email and who is taking over the consent manager role for the Bhlaraidh Extension project and who will be in touch with you in the future to present the further information outlined below for SEPA's consideration and comment.

I hope this helps to clarify our ongoing work on the project and our future intentions, and I would like to personally thank you for your assistance and advice in progressing this project over the last 6 months, it is greatly appreciated.

Kind regards

Carolyn

**Carolyn Wilson** || Consents Team Manager

**SSE Renewables**  
One Waterloo Street  
Glasgow  
G2 6AY

[sserenewables.com](https://www.sserenewables.com)



---

**From:** Planning.North [REDACTED]  
**Sent:** 12 November 2020 15:50  
**To:** [REDACTED]

**Subject:** [EXTERNAL] RE: Bhlaraidh Wind Farm proposal - Gatecheck report

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SEPA email response PCS/173870

Dear Mr McFadden

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

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

an opportunity to provide pre-application advice to the current layout and the potential impacts it will have on the aspects of the environment in which we have an interest.

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

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

Kind regards

Susan

**Susan Haslam**

Senior Planning Officer

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

Mobile: [REDACTED] email: [REDACTED]

Work Pattern: Full time Monday to Thursday + Friday morning

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---

**From:** [REDACTED]

**Sent:** 11 November 2020 13:34

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Bhlaraidh Wind Farm proposal

Dear Consultee

## **Bhlaraidh Wind Farm Extension proposal**

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

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

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

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

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

Yours faithfully

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

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\*\*\*\*\*

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Graesser House  
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Dingwall  
IV15 9XB

**SSE Renewables**  
1 Waterloo Street  
Glasgow  
G2 6AY

11 Dec 2020

**Dear Ms Haslam,**

Following on from your response to the Gatecheck report, I can confirm that we completed our final design workshop on the 1<sup>st</sup> of December for the Bhlaraidh Extension wind farm. Data from additional peatland and hydrological surveys completed in Sept/October 2020 was considered in detail as part of this design workshop.

We still have a few minor proposed design refinements to be validated by our civil engineering team. These final design refinements relate to proposed track realignments shown in red on the plans and small realignments / re-orientation of hardstandings away from pockets of deeper peat (these final refinements will be presented in the EIAR). The information we used at the design workshop to inform the current design freeze layout is presented on the following maps, all of which are attached here for your review:

1. **Refined NVC** - As mentioned in the scoping report, National Vegetation Classification (NVC) and Phase 1 habitat surveys were completed in June 2019. This initial NVC survey data has now been refined considering Stage 2 peat probing completed in September 2020 and further field data collated during a peatland condition assessment survey undertaken in October 2020. The peatland condition survey and NVC data was used to identify and consider better quality areas of peatland as part of the design process, as well as addressing comments raised through consultation with Nature Scot in relation to priority peatland habitat.
2. **GWDTE** - This has been refined and is now based on the refined NVC map referred to above. The majority of infrastructure is situated on M15c across the site and, as per previous correspondence relating to the potential moderate GWDTE on M15c vegetation, we would seek to obtain a similar position from SEPA as previously stated in PCS/171540 email response, "Subcategory M15c is generally a drier habitat and we are content that in this case the layout would not need to avoid impacts on it as it is very unlikely to actually be groundwater dependant".
3. **Peat Probe** x2 - Mott MacDonald map showing the existing wind farm and access track, and SSE design workshop map showing more detail of the extension infrastructure. These maps present all peat probe locations from both Stage 1 & 2 peat probing surveys as well as any relevant probing data available from the development/construction of the existing wind farm.

4. **Extrapolated Peat Depth** - This is based on the combined peat probe data (Stage 1 & 2 and existing data) and has been used to refine the design layout to ensure that infrastructure has avoided deep peat wherever possible. Proposed final design refinements to avoid these pockets will be verified by our civil engineering team. The majority of infrastructure now lies on peat depth <1m. As part of the on-going civil engineering validation process, where deeper peat sections cannot be avoided, floating track construction principles will be explored and shown as part of the design layout where applicable.
5. **Initial Peat Probe Risk Rating** – This is an initial indication of risk rating at probe locations. A full peat slide risk assessment will be undertaken and presented within the EIAR.
6. **Hydrology** - This demonstrates how the design layout avoids infrastructure within watercourse buffers and minimisation of watercourse crossings where possible. Final refinements may be made following civil engineering validation to confirm minor proposed track realignments, some of which have been identified to avoid water crossings or areas with potentially difficult hydrological conditions (e.g. heavily channelled topography etc).


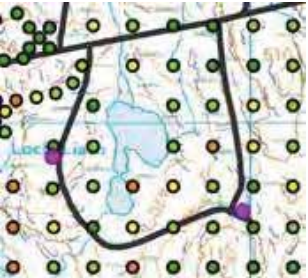
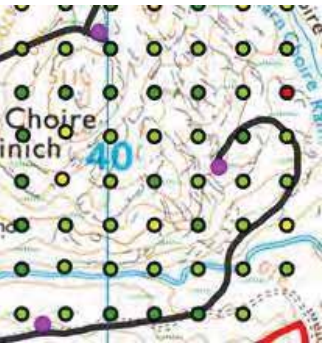
During the design freeze workshop, we also took into account the comments you raised after your last meeting with Carolyn Wilson (SEPA email response: PCS/171540, 3<sup>rd</sup> June 2020) and can confirm the following actions have been taken to address each comment:



| SEPA email response:<br>PCS/171540/3 <sup>rd</sup> June 2020   | Action taken   |
|--|--|
| <p>“Clearly demonstrate that suitable steps have been taken in the layout design to minimise peat disturbance”.</p> <p>“We will expect it to be demonstrated that the supporting infrastructure is minimised as much as possible. We would hope to see compound areas, laydown areas and borrow pits from the existing site re-use to minimise overall environmental disturbance”.</p> | <p>Stage 1 and Stage 2 peat probing surveys have been undertaken. This included:</p> <p>An initial Phase 1 ‘low resolution’ peat depth survey with the aim of obtaining wide-spread coverage of the site was carried out, to investigate the extent and depth of peat (up to 5m depth) to inform the site infrastructure layout design. To satisfy planning requirements, the peat probing survey was undertaken in accordance with the relevant guidance for sites in Scotland. This comprised a grid at 100m centres across areas within the Development Area where potential peat deposits were identified during desk-based studies. In addition to peat depth, the following information was recorded:</p> <ul style="list-style-type: none"> <li>• Visual description of peat layers and their approximate depth, with peat described as fibrous, pseudo-fibrous or amorphous;</li> <li>• Identification of consolidated acrotelmic and unconsolidated catotelmic material;</li> <li>• A subjective indication of peat moisture content made by visual and tactile assessment;</li> <li>• A visual description of surface hydrological conditions (e.g. well-drained, boggy, standing water); and</li> </ul> |



| SEPA email response:<br>PCS/171540/3 <sup>rd</sup> June 2020   | Action taken   |
|--|--|
|  | <ul style="list-style-type: none"> <li>Local slope angle, using a hand-held inclinometer.</li> </ul> <p>A second phase of 'refined' probing was undertaken once the infrastructure layout had been developed to target areas of proposed infrastructure locations. The data gathered included consideration of site characteristics. The following rationale was applied to the phase 2 probing survey:</p> <ul style="list-style-type: none"> <li>Tracks – 50m centres on centre line and 50m offsets on both sides to 50m beyond the end of any spur.</li> <li>Hardstandings – 25m centres and 25m and 50m offset through length of hardstanding inclusive of assist pads / lattice boom assembly pads.</li> <li>Turning Heads – 25m centres and 25m offset through length.</li> <li>Turbines – Turbine centre plus 4 x 25m radial offset and 4 x 50m radial offset.</li> <li>Substation Platform – 25m centres</li> <li>Batching Plant – 25m centres as extension to track grid.</li> <li>Areas of blanket bog / deeper phase 1 peat – 25m centres and 25m and 50m offsets of track centre line.</li> <li>Cross country cable options 50m centres on centre line and 50m offsets.</li> </ul> <p>To minimise disturbance to virgin ground, the compound area from the original Bhlairaidh Wind Farm construction will be re-used. As this is some distance from the main extension construction area, a satellite compound will be required, and this is proposed to be situated on the site of the former batching plant. Borrow pits from the original wind farm construction will not be utilised due to economics and significant construction logistic issues. The existing access tracks and also use of hydro access tracks have been utilised as part of the extension and opportunities for use of former hydro asset borrow pits will be explored further.</p> |
| <p>"It would be helpful if the final version of the peat probing plan used more regular classes of peat depth – why there is a division in categories at 20 cm, 55 cm and 170 cm is unclear. The categories used for the extrapolated peat</p> | <p>Final peat plan and extrapolated peat plan now both use 50cm categories and similar colour coding.</p>  |

| SEPA email response:<br>PCS/171540/3 <sup>rd</sup> June 2020   | Action taken  |
|--|---|
| <p>info look more sensible – in 50 cm divisions, with a nice clear colour change at 1 m so the deep peat is easy to see. However for the red category then we would want to see 2-3 m, if that is the case, so we know how deep the peat gets”.</p>  |   |
| <p><b><u>Habitats</u></b></p> <p>“Thank you for sharing the Phase 1 and GWDTE maps with us, and now the map showing the NVC classification for those areas which are identified as GWDTE. As expected the large area to the east which the development will impact on is M15, in this case M15c. Subcategory M15c is generally a drier habitat and we are content that in this case the layout would not need to avoid impacts on it as it is very unlikely to actually be groundwater dependant. The final submission should highlight that steps will be taken to minimise impacts on it via floating track where that’s possible and including regular cross drains where cut road is used to ensure that drainage between habitats is maintained”.</p> | <p>The NVC map has been updated following further surveys and review of all available information relating to peatland condition and priority habitats. This has also informed the updated GWDTE map.</p> <p>The updated NVC mapping has resulted in an increase in the amount of M15 habitat within the site extents. The specific classification has remained the same – M15c (with one exception discussed below) and as previously discussed, is considered very unlikely to be groundwater dependent given its dry nature and the hydrogeological site setting (underlying impermeable rocks generally without groundwater). As such, our opinion has not changed, and we would expect that the development would not need to avoid impacts on these areas provided suitable drainage is installed for habitat continuity purposes.</p> <p>The updated NVC mapping has identified two small areas of M11 (saxifrage) – classed as highly groundwater dependent. These areas cover only a few meters and are therefore not shown on the map due to scale, although grid references have been recorded. Given the hydrogeological site setting as discussed and the very limited extent of the habitat, it is unlikely that these small pockets of M11 are dependent on groundwater. The extended peatland condition survey results describe the areas as “a small fragment of saxifrage remaining” and “a scattering stretching several metres”. It is proposed to microsite the track to avoid these small patches ideally downstream and provide drainage continuity.</p> |

| SEPA email response: PCS/171540/3 <sup>rd</sup> June 2020   | Action taken  |
|---|---|
|  <p>“We would need to understand why a direct route has not been taken between these two turbines. We would like to see this route minimised as much as possible”.</p> <p>“This is also an example of an area where significantly more peat probing will be required – we would want the deep peat to be avoided”.</p>   | <p>The direct route was reviewed, however currently it is considered that topography precludes a direct approach from the south and turbine location options are limited, further limiting options for reconfiguration of the hardstand and turning head. Final verification is to be completed by civil engineering. Track alignment has been extensively probed and is now amended to avoid pockets of deep peat and will be optimised to minimise cut and fill as part of the final civil engineering validation.</p>  |
|  <p>“We wouldn’t be able to support a loop approach – one of these tracks would need to be removed”.</p>  | <p>A loop was not intended but this showed two potential track approaches to these turbines. Preference at design freeze was to design a separate track from the main spine road north to south towards each turbine (thus avoiding a watercourse crossing to the southwest of the lochan and likely deeper peat in the valley).</p>  |
|  <p>“We would want to understand why the two northern turbines are not connected rather than the two southern ones – this would remove a large watercourse crossing and reduce the length of new track required”.</p> <p>“Also, if the current connection is shown to be the better environmental option then we would want to understand why a more direct route wasn’t being taken”.</p> | <p>While it would be our preference to connect the turbines this way as it avoids the large watercourse crossing, shortens access track length and avoids requirement to upgrade the existing hydro access track, this is still considered to be unfeasible from an engineering perspective due to steep and complex topography. Peat is likely to be shallow due to the steep topography, however all engineering constraints will be finally reviewed during the validation exercise to confirm whether there is any possibility of this being a viable option and all other alternative approaches are investigated.</p> |

| SEPA email response: PCS/171540/3 <sup>rd</sup> June 2020  | Action taken  |
|--|---|
|  <p>“As a first option – can the existing substation be expanded.</p> <p>If not – the final location of a new substation should avoid deep peat”.</p> | <p>Feasibility assessment of the existing substation being utilised found it was not possible without significant extension, which would have required extensive earthworks and aggregate to extend the level platform due to the topography. It was also considered extremely challenging from a health and safety perspective because of incoming cables on multiple sides. Given these constraints, along with the additional cabling that would be needed to get from the extension turbines to the existing substation this option was not considered to be significantly environmentally beneficial.</p> <p>A wider area was peat probed at the proposed substation area in order to optimise the new location and avoid deep peat.</p> |
|  <p>Cable route is too close to the loch – a buffer is required, the size of which should be based on environmental risk.</p>                       | <p>This was presented initially to show an indicative route of the overhead line. This will not be included within the wind farm extension EIAR as this would be SSEN's responsibility to select a route and undertake the required environmental assessments. The indicative route shown was mapped in order to demonstrate to SSEN that a line could be routed without impinging on minimum spacing requirements from proposed turbine locations.</p>   |

I hope that the information presented here is sufficient to demonstrate that the iterative design process at this site has considered all impacts on deep peat, peatland habitat and potential groundwater dependent wetlands sufficiently to minimise impacts where possible.

If you have any comments on any aspect presented above, please do get in touch, or I would be happy to arrange a virtual meeting to discuss further.

Yours sincerely,

**Jane MacDonald**  
Consents Manager

## The Highland Council (THC)

## Sarah Tullie

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 03 March 2021 08:36  
**To:** Nicola Sukatorn; [REDACTED]  
**Cc:** Jennifer Skrynka; Cunningham, Craig; Macdonald, Jane; Roy Ferguson; [REDACTED] Wilson, Carolyn  
**Subject:** RE: Bhlaraidh Extension - Cumulative LVIA Consultation (March 2021)

Good Morning Nicola,

I have compared the submitted details against our records and the wind energy map on our website. The wind energy map was updated at the start of the year.

There are a number of sites that appear to be just on the edge of your study area which should be included or that perhaps require updating :

- Cairn Dhuie (consented but a re-design application is about to be submitted);
- Coire na Cloiche;
- Strathrory;
- Strathrory Wood (Scoping but understand the application will be submitted shortly);
- Loch Luichart Extension 2 (re-design application about to be submitted).

I agree that constructed schemes should be re-montaged into the visualisations.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 02 March 2021 17:49  
**To:** [REDACTED]  
[REDACTED]  
**Subject:** Bhlaraidh Extension - Cumulative LVIA Consultation (March 2021)

Dear Simon and Matt,

Please can we consult with you on cumulative sites for inclusion in the Bhlaraidh CLVIA? Please see attached letter and accompanying drawing.

We look forward to hearing from you,

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL

Tel. [REDACTED]  
[REDACTED]

*Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)*

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## Sarah Tullie

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 01 March 2021 22:14  
**To:** Roy Ferguson  
**Cc:** Macdonald, Jane; Cunningham, Craig; Jennifer Skrynka; Nicola Sukatorn; Wilson, Carolyn  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)  
**Categories:** Bhlaraidh

Roy / Nicola,

Further to your emails below and the uploading of information on to the case file I have now had the opportunity to review the submitted information with our landscape architect.

Firstly and in relation to the Study area, I feel that a robust assessment for the full 45km study area will be required given the scale of the turbines proposed within the development. I would not be in a position to support the screening in or out of viewpoints based upon distance.

In relation to Wild Land, I would recommend that you scope this with NatureScot and then advise us of their position.

Our landscape architect has reviewed in detail the approach to the visible lighting assessment and advises that with turbines proposed at 180m to blade tip, the requirement for Aviation Lighting becomes an important consideration in potential impacts on Landscape Character and Visual Impact, particularly where it influences perception of existing sense of place or perception of wildness or remoteness.

Lighting is likely to be visible from over half of the proposed viewpoint locations,. The development's location close to the Loch Ness and Duntelchaig Special Landscape Area as well as to Inverness, places it at a nexus where the sensitivities of tourism visitors and local residents traveling experience coincide, as such an increase in the number of Dark Hours visualisations from the proposed three is appropriate

Nacelle mounted aviation lights can reflect off the blades as they move through the upper part of their rotation, therefore it isn't necessarily enough to assess impacts only in viewpoints where hubs themselves are visible. The Consultation ZTV for Lighting shows potential exposure to hubs only. With this in mind, and looking at the earlier ZTV with Proposed Viewpoints Figure 8.1, a viewpoint on the A82 southbound overlooking Urquhart Bay should be added and include full Dark Hours visualisations. Duplication of the viewpoint close to Temple Pier identified in Loch Liath Scoping at A82/Great Glen Way, Urquhart Bay 252972, 830032 is likely to be particularly useful

Dark Hours visualisations should also be completed for Viewpoints 7, 10 and 26.

In relation to the viewpoints, having reviewed the wireframe viewpoint images and ZTV mapping we note that the electronic ZTV's for Viewpoint and Lighting Consultation, which show the ZTV for 'SSE Design Layout 04D a' are fairly low resolution, which necessarily limits the amount of information to be gleaned from them. The earlier ZTV with Proposed Viewpoints Figure 8.1 is of higher resolution but it isn't entirely clear if the differences in extent of visibility are due to further design iteration or if 8.1 shows visibility to blade tip. With that said I support the scope of viewpoints proposed.

I trust the above response is useful. If you have any further matters you wish to discuss in relation to this proposed development, please do not hesitate to contact me.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

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**From:** Roy Ferguson [REDACTED]  
**Sent:** 11 February 2021 08:47  
**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Simon

Following on from your email correspondence with Nicola Sukatorn (below), I can confirm that I have upload the documents to eplanning as post submission additional information using the reference number 19/03373/SCOP. The online reference is 100362803-001.

Regards  
Roy

---

**From:** Nicola Sukatorn  
**Sent:** 08 February 2021 18:43  
**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Many thanks Simon,

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 08 February 2021 18:37  
**To:** Nicola Sukatorn [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Nicola,

Apologies for not coming back sooner. Could you please upload via the eplanning.scot portal i.e. the Council eplanning website.

In doing so you will have to use the Post Submission Additional Documentation section of the portal and yes this would be referring to the Scoping Report rather than the planning application.

If there are any issues with uploading them to the portal please email [REDACTED] and they will be able to assist.

Kind regards,

Simon

Simon Hindson

Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]

**Sent:** 08 February 2021 17:54

**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

I appreciate you are very busy, so I just wanted to ask if you had any thoughts on my previous email, or whether you would like us to upload to ECU or the THC eplanning website? Please could you also confirm if you would still like the tag 'post submission additional information' to be used? We assume the 'submission' here refers to the Scoping Report, as opposed to the planning application.

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

---

**From:** Nicola Sukatorn

**Sent:** 02 February 2021 09:53

**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

We have looked into uploading the figures to the eplanning website, but since the Scoping application was submitted to ECU through their portal, we assume these consultation figures may need to be uploaded to ECU's portal. We appreciate that there may be a preference to keep ECU documents to final application documents. We are therefore wondering if there may be another way for us to send you the consultation figures or another location to upload them? If the eplanning website is the best way for you, we can continue looking into this.

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

---

**From:** Nicola Sukatorn

**Sent:** 28 January 2021 16:20

**To:** Simon Hindson [REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Hi Simon,

That's no problem – we will upload the figures to the eplanning portal and let you know when they are there.

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]

**Sent:** 27 January 2021 19:48

**To:** Nicola Sukatorn [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC) [Filed 28 Jan 2021 09:54]

Hi Nicola,

Unfortunately our security policies do not allow us to access the figures on the file sharing website.

Would you be able to upload them to eplanning as post submission additional information using the reference number 19/03373/SCOP?

Thanks,

Simon

Simon Hindson

Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]

**Sent:** 27 January 2021 12:58

**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** Bhlaraidh Extension - Further LVIA Consultation (Jan 2021) (THC)

Dear Simon,

We wish to consult further with you on the LVIA for Bhlaraidh Wind Farm Extension. Please see attached letter and table.

Figures can be downloaded from this link (expires in 1 week): [REDACTED]

These include two ZTV figures (*119009-D-LC1-1.0.0 Lighting Consultation (January 2021)*); and *119009-D-VPC4-1.0.0 Viewpoint Consultation (January 2021)* ) and draft wirelines from all proposed viewpoints

Kind regards,

**Nicola Sukatorn**

Senior Landscape Architect

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ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL  
Tel. [REDACTED]  
Email. [REDACTED]

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## Sarah Tullie

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 12 June 2020 16:30  
**To:** Nicola Sukatorn  
**Cc:** Jennifer Skrynka; Cunningham, Craig; Wilson, Carolyn; Roy Ferguson; [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - LVIA VP Consultation (June 2020) (THC)

Hi Nicola,

Having reviewed the attached, I am generally content with the viewpoints proposed. Given the scale of the turbines it would be important to understand the visibility in relation to aviation lighting as well so if you can please consider which viewpoints will be accompanied by visualisations for hours of darkness as well.

When it comes for finalised siting of viewpoints for photography purposes please ensure that due consideration is given to intervening vegetation, fences, buildings etc.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 12 June 2020 16:15  
**To:** Simon Hindson [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** Bhlaraidh Extension - LVIA VP Consultation (June 2020) (THC)

Dear Simon,

We wish to consult further with you regarding the LVIA Viewpoints for Bhlaraidh Wind Farm Extension, please see attached letter, drawing and table.

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL  
**Tel.** [REDACTED]  
**Email.** [REDACTED]

*Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)*

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Our Ref.: 119009-L-THC2-1.0.0

Date : 12.06.20

The Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

FAO : Simon Hindson, Team Leader – Strategic Projects

Dear Simon,

### **Bhlairaidh Wind Farm Extension: LVIA Viewpoints (Further Consultation June 2020)**

Following on from our LVIA Viewpoint consultation of October 2019<sup>1</sup>, we are writing to confirm the proposed Viewpoints (VPs) for Bhlairaidh Wind Farm Extension LVIA.

Since October 2019, some small amendments and clarifications have been made to the Proposed Development (reference Layout SSE DL03), and consequently to the VPs, as detailed in the attached document. A list of proposed viewpoints is appended to this letter (119009-N-VP2-1.0.0), with a viewpoint plan (119009-D-VPC2-1.0.0).

The key changes are as follows:

- As a result of the amended turbine layout for the Proposed Development, theoretical visibility has now been removed from the circular path (core path) around Loch Affric. **Scoping VP 8** was located on this path, so we propose to omit this VP from the assessment.
- Although theoretical visibility has been removed from the circular path around Loch Affric, there are some areas of theoretical visibility on hill slopes and elevated areas. Therefore, **VP 20** (Path north of Loch Affric; previously **SNH2** in post-scoping consultation) and **VP 21** (Toll Creagach; previously **SNH3** in post-scoping consultation) are included to illustrate views from elevated locations in the Glen Affric NSA.
- In the Pre-Application Advice Pack (PAAP), a VP was requested to illustrate “routes along the north side of Loch Affric and Loch Beinn A’Mheadhoin within the Glen Affric NSA”. We suggest **VP 19** is located on a mountain track (located north of the removed **Scoping VP 8**), near the junction with the core path, at approximately 214770, 823054 to illustrate the theoretical visibility from this location.
- In the October 2019 consultation, it was noted that some VPs could be excluded from the LVIA if the Proposed Development turbines were to be under 150m tip height, due to the size of study area. However, as the Proposed Development will now comprise turbines that will be over 150m to tip, we confirm that the **VP 23** and **VP 24** (previously **THC1** and **THC2** in post-scoping consultation) will be included in the LVIA to illustrate distant views of the Proposed Development.

<sup>1</sup> See letter 119009-L-SNH1-1.0.0; drawing 119009-D-VPC-1.0.0 and list of viewpoints in document 119009-N-VP-1.0.0.

- All other VPS in the attached document remain as they were in our October 2019 consultation, but with some updated VP numbering. We have not identified any other areas of 'new' theoretical visibility occupied by the current Proposed Development (Layout SSE DL03) that would require other VPs.

This letter is being sent to Scottish Natural Heritage, The Highland Council and Energy Consents Unit.

Further consultation regarding other LVIA matters raised in your Scoping letter will be addressed separately.

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

Kind regards,



**Jennifer Skrynka**  
Managing Director

Cc: Craig Cunningham and Carolyn Wilson (SSE Renewables); Roy Ferguson (ITPE); Matt Burnett (SNH); Stephen McFadden (ECU)

**Sarah Tullie**

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 24 October 2019 13:51  
**To:** Nicola Sukatorn  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (THC)

Nicola,

Thank you for sending over this figure.

On review, I am generally content with the proposals for viewpoints subject to micrositeing to achieve the best possible image of site.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects

Phone: [REDACTED]

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 23 October 2019 14:44  
**To:** Simon Hindson  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (THC)

Hi Simon,

Thank you for your email. The figure we sent via file transfer was large (almost 88 MB), so we attach a low resolution version of the figure. If you would like a copy of the higher resolution drawing, then please let us know what format would be best.

Kind regards,

**Nicola Sukatorn**  
Senior Landscape Architect

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 23 October 2019 13:41  
**To:** Nicola Sukatorn  
**Cc:** [REDACTED]  
**Subject:** RE: Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (THC)

Hi Nicola,

Apologies, I am just back from annual leave and I am unable to download the figure. Can you please forward the figure on via email as we can not access file sharing webpages due to conflicts with our IT security policies.

I am in general agreement with the contents of the proposed letter and table however I would like to review the figure before I provide a formal response.

Kind regards,

Simon Hindson  
Team Leader – Strategic Projects

Phone: [REDACTED]

---

**From:** Nicola Sukatorn [REDACTED]  
**Sent:** 15 October 2019 15:18  
**To:** Simon Hindson  
**Cc:** [REDACTED]  
**Subject:** Bhlaraidh Extension - Post-Scoping LVIA Viewpoint Consultation (THC)

Dear Simon,

Thank you for providing your recent consultation response to the Bhlaraidh Wind Farm Extension Scoping Report. Please find attached a consultation letter regarding the LVIA Viewpoints.

An accompanying figure can be downloaded from this link (which expires in 1 week on Tuesday 22<sup>nd</sup> October):

[REDACTED]

Kind regards,



**Nicola Sukatorn**  
Senior Landscape Architect

---

ASH design+assessment  
21 Gordon Street, Glasgow, G1 3PL  
**Tel.** [REDACTED]  
**Email.** [REDACTED]

*Please visit our website at [www.ashdesignassessment.com](http://www.ashdesignassessment.com)*

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Our Ref.: 119009-L-THC1-1.0.0

Date : 15.10.19

The Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

FAO : Simon Hindson, Team Leader – Strategic Projects

Dear Simon,

## **Bhlaraidh Wind Farm Extension LVIA: LVIA Viewpoints**

ASH design + assessment Ltd has been contracted to provide Landscape and Visual Impact Assessment (LVIA) services for the proposed Bhlaraidh Wind Farm Extension (the 'Proposed Development'). We write to you regarding the LVIA Viewpoints and your recent consultation response to the Scoping Report (23<sup>rd</sup> August 2019, your ref. 19/03373/SCOP).

Further consultation regarding other LVIA matters raised in your Scoping letter will be addressed separately.

### *Proposed Viewpoints*

We appreciate your review of the proposed viewpoints for inclusion in the LVIA and propose the following:

- Two viewpoints have been requested by THC, situated approximately 43km and 45km to the north-east of the proposed development: An Cabar (Ben Wyvis) and on the NCN1 – Between Dingwall and Evanton. These are illustrated respectively as **THC1** and **THC2** on the attached plan. These VPs would illustrate very distant views, both to the north-east of the site.
  - If the proposed development consists of turbines *above* 150m tip height, we would include these VPs given that the study area would extend to 45km.
  - However, if the proposed development turbines are all *under* 150m tip height, we would not propose to include these, given that the study area would be reduced to 40km, as per SNH guidance.
- We agree to include an additional viewpoint in the Central Black Isle, on the road between Tore and Raddery (see **THC3** on the attached plan), where a suitable location would be chosen on site. A location has been suggested on the attached plan, around 38km from the proposed development, based on a desk-based review of theoretical visibility, aerial imagery and googlemaps but this may be relocated on site.
- We agree to the addition of a viewpoint on the A87 / A887 near Bun Loyne (see **THC4** on the attached plan), where a suitable location would be chosen on site. A location has been suggested on the attached plan, based on a desk-based review of theoretical visibility, aerial imagery and googlemaps but this may be relocated on site.

- We agree to include a viewpoint at the top of the path at the summit of the Suidhe (see VP **5b (THC5)** on the attached plan), in addition to VP **5a** (Suide Viewpoint, B862), which is located by the car park.
- The purpose of selected and agreed VPs will be identified in the LVIA.

Consultation with Scottish Natural Heritage on proposed viewpoints is also being undertaken and you are included in this correspondence. A list of proposed viewpoints is appended to this letter (119009-N-VP), with a viewpoint plan (119009-D-VPC).

We trust that this is acceptable to you but if you have any further queries or comments on the above please let us know as soon as possible.

Kind regards,



Jennifer Skrynka  
Managing Director

Cc: Craig Cunningham and Alasdair Wilson (SSE Renewables); Roy Ferguson (ITP); Matt Burnett (SNH); Mark Ashton (ECU)

## Sarah Tullie

---

**From:** Simon Hindson [REDACTED]  
**Sent:** 07 February 2020 12:00  
**To:** Roy Ferguson  
**Cc:** Paul Darnbrough; Sarah Tullie  
**Subject:** RE: Bhlaraidh Wind Farm Extension: Air Quality Assessment

**Categories:** Bhlaraidh

Hi Roy,

Apologies for not getting back to you sooner.

I would agree that based upon the likely impacts that Air pollution can be screened out. However, I would request that the mitigation proposed during the construction period, is still included in the Schedule of Mitigation.

Kind Regards,

Simon

Simon Hindson  
Team Leader – Strategic Projects Team

---

**From:** Roy Ferguson [REDACTED]  
**Sent:** 28 January 2020 16:52  
**To:** Simon Hindson <[REDACTED]>  
[REDACTED]  
**Subject:** Bhlaraidh Wind Farm Extension: Air Quality Assessment

Dear Simon

Thank you for your Scoping Response to the ECU with respect to the proposed Bhlaraidh Wind Farm Extension proposal.

With regards to air quality I would like to highlight that air quality assessment are typically undertaken following the Institute of Air Quality Management (IAQM) Land Use Planning and Development Control: Planning for Air Quality guidance (IAQM, 2017).

### Construction Traffic

The IAQM sets out indicative criteria for requiring an air quality assessment:

| The development will:   | Criteria to Proceed to an Air Quality Assessment   |
|---|--|
| 1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight). | A change of LDV flows of:<br>- more than 100 Annual Average Daily Traffic (AADT) within or adjacent to an Air Quality Management Area (AQMA).<br>- more than 500 AADT elsewhere. |
| 2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight).      | A change of HDV flows of:<br>- more than 25 AADT within or adjacent to an AQMA.<br>- more than 100 AADT elsewhere.   |



The site is not located within an Air Quality Management Area and the anticipated traffic flows for LDVs and HDV are less than the criteria outlined above.

We will provide full details of the anticipated traffic flows within the EIA Report.

### **Operation Traffic**

During operation there will be approximately one vehicle a week visiting the site, which is less than the criteria outlined above.

### **Construction Dust**

Construction activities (such as borrow pit works) have the potential to generate dust during dry spells, which may adversely affect local air quality. Given the scale and nature of construction activities and given the distance between construction areas and the nearest residential properties, it is considered that dust from construction is unlikely to cause a nuisance.

Any emissions/dust created during the construction of the development would be controlled through legislation (e.g. Pollution Act) and standard best practice (e.g. as outlined by Institute of Air Quality Management Guidance on the Assessment of Dust from Demolition and Construction) which would be detailed in the Construction Environmental Management Plan (CEMP). We anticipate that the requirement to produce, submit and abide by the CEMP will be a condition of the consent.

### **Operational Emissions**

There are no combustion processes associated with the operation of the development and therefore no assessment of operational effects is required.

Based on the above we propose that an air quality assessment is not required for the Bhlaraidh Wind Farm Extension and can be scoped out of the EIA.

Please can you confirm that you agree that air quality should be scoped out of the EIA?

Regards  
Roy

**Roy Ferguson | Senior EIA Consultant | ITP Energised**

Tel: [REDACTED]  
60 Elliot Street, Glasgow, G3 8DZ  
[www.itpenergised.com](http://www.itpenergised.com)

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## THC Environmental Health Officer (EHO)

## Sarah Tullie

---

**From:** Cais, Calum [REDACTED]  
**Sent:** 08 December 2020 11:53  
**To:** Robin Fraser  
**Cc:** James Mackay; Gemma Clark; Macdonald, Jane; Cunningham, Craig; Roy Ferguson  
**Subject:** RE: Bhlaraidh Extension - noise assessment

**Categories:** Bhlaraidh

Hi Robin

No apology necessary, I understand you've probably several projects coming your way at the minute, so thanks for taking the time to respond.

Thanks for the detailed responses – we'll be sure to consider these in the assessment.

Hope you have a good Christmas and New Year if I don't contact you again before then.

Regards

Calum

---

**From:** Robin Fraser [REDACTED]  
**Sent:** 04 December 2020 12:03  
**To:** Cais, Calum [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - noise assessment

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

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As per usual my apologies for taking so long to get back to you. To respond directly to your queries; -

-You agree with our proposed approach to use the previously collected baseline noise data at Bhlaraidh and Levishie to set noise limits;

I understand the background measurements were affected by noise from nearby watercourses but I am satisfied that for those NALs this noise can be considered as part of the background noise. I'm happy with the approach that has been taken with rain fall data to ensure the background levels are representative. I also note that at Achnaconeran, which is not impacted by noise from the river, a simplified ETSU limit of 35dB LA90 has been applied and I welcome that approach.

- You agree with the general approach we are proposing to set noise Total and Site Specific Noise Limits at the nearest receptors;

I'm happy with the approach taken on the understanding that the cumulative figures are based on the conditioned limits for Blaraidh and a 2dB margin over predicted levels for other developments due to significant headroom. At NALs where developments are more than 10db below ETSU limits, they have been discounted from the cumulative assessment. I'm happy with this approach.

With regard to site specific limits, to avoid repeating the same cumulative noise problems for future developments, my preference is to cap limits at 2db above predicted. In some cases this will result in very low limits which would be too low to undertake compliance monitoring. It may be that proxy monitoring locations could be used or it might

be reasonable to set limits only for Levishie and Achnaconeran. The latter will undoubtedly be the controlling property.

- The Council is aware of any schemes which should be included in the cumulative noise assessment or any other dwellings which should be considered; and  
I'm not aware of any other schemes that should be considered however, I would advise that you seek confirmation from the planning Service.

- You agree that a vibration assessment is not required.

Agreed

Again, sorry for the delay. If there's anything you want to discuss please get in touch.

Regards,  
Robin Fraser  
Environmental Health Officer  
Highland Council, Community Services, 38 Harbour Road, Inverness, IV1 1UF  
Telephone: [REDACTED] E-Mail: [REDACTED]

**N.B.** Any email message sent or received by the Council may require to be disclosed by the Council under the provisions of the Freedom of Information (Scotland) Act 2002

Environmental Health welcomes your feedback. Please help us improve our service by taking our short customer survey by clicking on this link  
<https://www.surveymonkey.com/s/highlandeh>

---

**From:** Cais, Calum [REDACTED]  
**Sent:** 25 November 2020 16:06  
**To:** Robin Fraser [REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - noise assessment

Hi Robin

I hope you are keeping well?

Just wanted to follow up to see if you had any comments on the proposed approach to the EIA or whether you're happy for us to continue on the basis of the method proposed?

Thanks

Calum

---

**From:** Cais, Calum  
**Sent:** 03 September 2020 09:08  
**To:** Robin Fraser [REDACTED]  
**Cc:** James Mackay [REDACTED]  
[REDACTED]  
**Subject:** RE: Bhlaraidh Extension - noise assessment

Hi Robin

I hope you're keeping well? Please accept my apologies for the delay in getting this letter to you. As discussed at our previous meeting on Bhlaraidh wind farm extension James and Gemma at TNEI have prepared the attached letter for your consideration.

You will see that the letter is in line with the discussions we had on 3<sup>rd</sup> August, but with greater detail. Our intention is to agree some of the broad principles ahead of the full EIAR chapter and appendices.

As such I hope that you will find the letter useful, and that if you have any queries or issues that you can contact either myself or TNEI directly to discuss. If you are comfortable with the principles and approach proposed I would be grateful if you could confirm this, in which case we will continue with the assessment for the EIA as per the letter.

I look forward to hearing from you in due course.

Regards

Calum

---

**From:** Robin Fraser [REDACTED]  
**Sent:** 31 July 2020 13:55  
**To:** Cais, Calum [REDACTED]  
**Subject:** [EXTERNAL] RE: Bhlaraidh Extension - noise assessment

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

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Hi Calum, Monday afternoon would be best for me.

Regards,  
Robin Fraser  
Environmental Health Officer  
Highland Council, Community Services, 38 Harbour Road, Inverness, IV1 1UF  
Telephone: [REDACTED] E-Mail: [REDACTED]

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Environmental Health welcomes your feedback. Please help us improve our service by taking our short customer survey by clicking on this link  
<https://www.surveymonkey.com/s/highlandeh>

---

**From:** Cais, Calum [REDACTED]  
**Sent:** 31 July 2020 13:54  
**To:** Robin Fraser [REDACTED]  
**Subject:** Bhlaraidh Extension - noise assessment

Hi Robin

I hope you're well? I wondered if you might be available to talk through the noise assessment that we intend to carry out for Bhlaraidh Extension next week?

TNEI have been appointed by SSE to carry out the assessment and have availability at the following times. If you are able to attend a call to discuss the assessment at any of the times below please let me know and I can arrange a call.

Monday  
11:00 – 17:30

Thursday  
09:00 – 17:30

Regards

**Calum Cais** || Noise Analyst

**Working days Mon. & Wed. to Fri.**

**SSE Renewables**

One Waterloo Street  
Glasgow, G2 6AY

**T:** [REDACTED]  
**M:** [REDACTED]

**sserenewables.com**



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**Listening \* Open \* Valuing \* Improving \* Supporting \* Partnering \* Delivering**  
**Èisteachd \* Fosgailte \* Luach \* Leasachadh \* Taic \* Com-pàirteachas \* Libhrigeadh**

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01 September 2020

Ref: 13813-001 – R0

Sent by email only.

Mr Robin Fraser  
Environmental Health Officer  
Highland Council  
Community Services  
38 Harbour Road  
Inverness  
IV1 UF

Dear Mr Fraser,

**PROPOSED BHLARAI DH WIND FARM EXTENSION ON LAND TO THE NORTH WEST OF INVERMORISTON: NOISE ASSESSMENT**

As you are aware, SSE Generation Ltd (SSE) is considering developing an extension to the operational Bhlaraiddh Wind Farm ('the proposed development') to the north west of Invermoriston. An initial draft wind farm layout is shown on the enclosed Figure A1.1 (Appendix 1).

TNEI Services has been appointed by SSE to undertake the noise assessments for the proposed development, and prior to commencing the noise assessments we would like to agree the noise assessment methodologies with you.

*Construction and Decommissioning Noise*

If required, a construction and decommissioning noise assessment will be undertaken to determine the potential noise impacts during the construction and decommissioning phases of the wind farm development. The construction and decommissioning noise assessment would be undertaken in accordance with the methodology outlined in British Standard (BS) 5228-1:2009+A1:2014 and ISO9613:1996 ('Acoustics - Attenuation of sound during propagation outdoors -Part 2: General method of calculation'). Impacts will be assessed using criteria contained within BS5228 and, where appropriate, mitigation measures will be proposed.

As per the Scoping Report, it is proposed that vibration is scoped out of the EIA.

***Operational Noise***

An operational noise assessment will be undertaken in accordance with ETSU-R-97 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97) and the Institute of Acoustics document 'A good practice guide to the application of ETSU-R-97 for the assessment and rating of wind turbine noise' (IOA GPG). In relation to wind turbine noise PAN 1/2011 'Planning and Noise' refers to the Scottish Government's 'Onshore Wind Turbines' web based document which states that:

*"ETSU-R-97 describes a framework for the measurement of wind farm noise, which should be followed by applicants and consultees, and used by planning authorities to assess and rate noise from wind energy developments, until such time as an update is available".*

Newcastle  
7th Floor, West One  
Forth Banks  
Newcastle Upon Tyne  
NE1 3PA

Tel: [REDACTED]



And;

*“The Institute of Acoustics (IOA) has since published Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise The document provides significant support on technical issues to all users of the ETSU-R-97 method for rating and assessing wind turbine noise, and should be used by all IOA members and those undertaking assessments to ETSU-R-97. The Scottish Government accepts that the guide represents current industry good practice.”*

The noise limits derived in the assessment would inform appropriate noise related planning conditions should an application be made and should the Scottish Ministers be minded to grant consent.

#### **ETSU-R-97**

ETSU-R-97 describes the findings of the Working Group on Noise from Wind Turbines, the aim of which was to provide information and advice to developers and planners on the environmental assessment of operational noise from wind turbines.

ETSU-R-97 recommends noise limits should be set at 5dB(A) above existing background noise levels, subject to fixed minimum limits (35-40dB for quiet daytime and 43dB for night-time periods), and that these limits should reflect the variation in background noise with wind speed. Higher fixed minimum limits apply to the occupiers of properties that have a financial interest in the wind farm development. The choice of daytime fixed minimum limits should be considered in light of the guidance contained within ETSU-R-97 and the IOA GPG. Noise limits established at properties in accordance with ETSU-R-97 shall be applicable to all existing / proposed wind turbines in the area, and will henceforth be referred to as the ‘Total ETSU-R-97 Noise Limits’.

Site Specific Noise Limits would then be derived taking account of the noise limits already allocated to, or the limit that may be used by, other wind farm developments in the area. The Site Specific Noise Limits will be derived using the principles contained within the IOA GPG (which may include the use of the controlling property principal / determining if there is significant headroom etc). The Site Specific Noise Limits will be the limits that the proposed development would have to operate within should consent be granted.

#### **Background Noise Survey**

As part of the pre-construction work undertaken for Bhalaraidh Wind Farm a background noise assessment was undertaken in June/ July 2015 at two properties to the south to the proposed development. The noise monitoring was undertaken by Spectrum Acoustics. The two noise monitoring locations (NMLs) are shown on Figure A1.1 (Annex 1) and in the photographs below. At NML1 No.2 Bhlaraidh (approximate OS Grid Reference: 238064, 816644), the kit was sited in the north facing garden to the rear of the property and at NML2 Levishie House (approximate OS Grid Reference: 240263, 817682), the kit was sited to the north east of the property.



Bhlaraidh is comprised of a cluster of ~11 properties and Levishie a cluster comprising ~3 dwellings. Background noise levels were monitored at a height of between 1.2m and 1.5m above ground, in line with the ETSU-R-97 / IOA GPG guidance. The noise monitoring equipment was located in a free-field position at least 3.5m away from hard reflective surfaces where practicable and within the residential amenity area where possible.

There was a 70 m meteorological mast (met mast) installed to the north east of the Bhlaraidh Wind Farm site (within the proposed development site, See Figure A1.1) and that was used to collect wind speed and direction data at various heights during the noise survey.

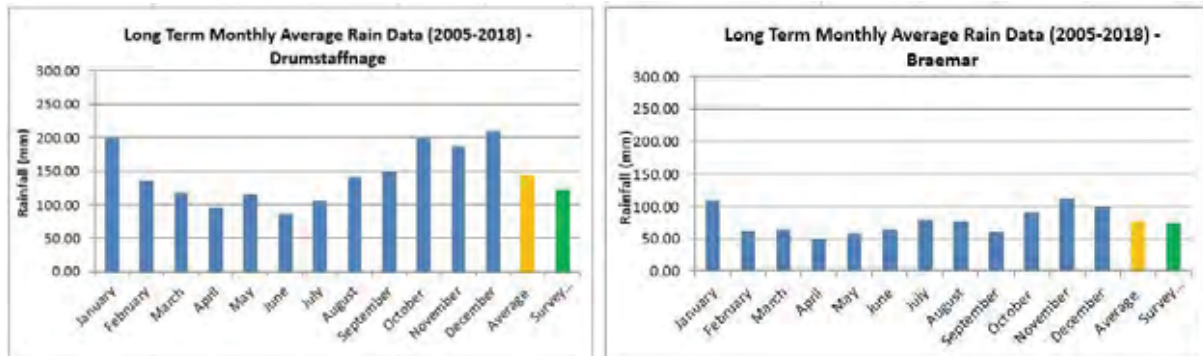
### ***Operational Noise Assessment for the Proposed Development***

TNEI has undertaken a detailed review of the raw noise and meteorological data collected and re-analysed it in accordance with ETSU-R-97 and current good practice. The wind speed data collected at 50 m and 70 m height were used to calculate hub height wind speeds (114 m) which were then standardised to 10 m height, in accordance with current good practice. The hub height is subject to change but at this stage the 114 m hub represents a worst case in the design envelope currently being considered for the proposed development. The measurement heights of 70 m and 50 m conform with the IOA GPG stipulation that measurements should be taken at a height not less than 60 % of hub height and at least 15 m below.

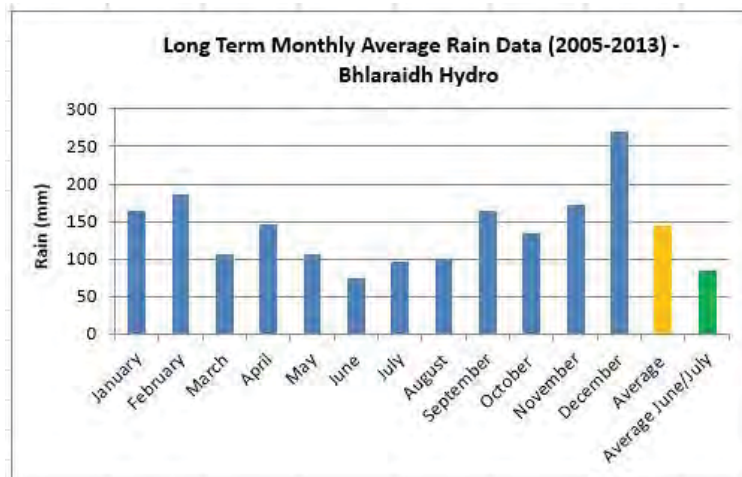
The overall soundscape at both receptors is affected by the nearby watercourses. Both clusters of properties are in proximity to the River Moriston to the south which Spectrum Acoustics noted was audible at both monitoring locations as well as two other watercourses Allt Bhlaraidh (which runs to the west of Bhlaraidh) and Levishie Burn (which runs through the centre of the properties at Levishie). During the survey there were some periods of rainfall and some apparent lagging in the data following a rainfall event, however the noise levels remain relatively steady at both locations throughout the survey. The impacts of rainfall are discussed in SGN2 of the IOA GPG (Section 2.4).

Section 2.4.1 of SGN2 states that *'if the rainfall and resulting watercourse flows are atypical then it may be appropriate to remove the data.'* However, Section 2.4.2 states that *'at some locations, the background noise environment will be dominated by noise from watercourses and the data may therefore show little correlation with wind speed. In such circumstances data filtering may not be necessary, this can sometimes be supported by using long term rain data for the area to show that rain fall during the survey period.'*

There appears to be a couple of periods of lagging in the noise data collected at both receptors and although this is most probably part of the natural variation at the receptors after a period of rainfall throughout the year the we have looked to remove periods, using data measured from the rain gauge, where short term increases in noise were apparent. To ensure that the level of rain measured during the monitoring period was representative of the long term rainfall, TNEI has reviewed the rain data collected at two of the closest weather stations to the site. As per Figure 5 of SGN 2 we compared the long term rain data from these weather station with the data collected during the months of the background noise survey and as can be seen on the two graphs below, the rainfall data collected during the survey months appears to be representative of typical conditions.



In addition, the graph below shows the long term rain data collected as part of the Bhlaraidh Hydro Scheme. Although the data collection period did not cover the survey year of 2015, it does show that the average yearly rainfall (yellow bar) compared to the average during the months when the survey was undertaken (June/July) (green bar).



A set of Regression Analysis Graphs showing the wind speed vs wind direction data for the daytime and night time periods at both NMLs are included within Appendix 1 as A1.2a and A1.2b. A set of Time Series Graphs have also been included which shows the variation of noise levels with wind speed and wind direction during the noise survey. Rainfall events are marked in blue on both sets of graphs and all excluded data in red. The excluded data reflects the data excluded due to lagging and also some atypical periods. We do intend to undertake a site visit to both locations (subject to any Covid 19 restrictions<sup>1</sup>) but we do anticipate that the data collected is representative of the two locations given their proximity to the watercourses.

<sup>1</sup> <https://www.ioa.org.uk/sites/default/files/Joint%20Guidance%20on%20the%20Impact%20of%20Covid.IOA%20ANC%20V2.pdf>

On that basis we propose to use the datasets to set noise limits at Bhlaraidh and Levishie as part of the noise assessment for the proposed development. The datasets will be used to derive the Total ETSU-R-97 Noise Limit (applicable to all schemes in the area) and the Site Specific Noise Limits for the proposed development which take account of the noise limit allocated to, or could be used by other schemes in the area.

### ***Cumulative Noise Assessment***

There are a number of operational wind farms and a proposed wind farm in the area and as such TNEI has undertaken some preliminary modelling to consider the schemes operating in conjunction with the proposed development. The schemes currently proposed for inclusion within the noise assessment are listed below:

- Corrimony (operational);
- Bhlaraidh (operational); and
- Fasnakyle (pre-planning).

TNEI understand that a planning application for the proposed Fasnakyle Wind Farm has not yet been submitted but it has been included within the initial modelling for completeness.

The wind turbines identified to date are shown on Figure A1.1. We would be grateful if you confirm whether you are aware of any other proposed, consented and operational wind turbine developments which are not listed above which would need to be included within the noise assessment.

### ***Limit Derivation and Initial Noise Modelling***

The preliminary noise modelling has been undertaken in three stages:

- 1) deriving the Total ETSU-R-97 Noise Limits (which are applicable to noise from all wind turbines in the area operating concurrently) at noise sensitive receptors;
- 2) predicting the likely effects (undertaking a cumulative noise assessment where required) to determine whether noise immissions at noise sensitive receptors will meet the Total ETSU-R-97 Noise Limits; and
- 3) deriving Site Specific Noise Limits for the proposed development (taking account of the noise limit that has already been allocated / could realistically be used by other schemes) and undertaking predictions against those limits.

A total of seven Noise Assessment Locations (NALs) have been identified for the initial modelling. The NALs were chosen to represent the noise sensitive receptors located closest to the proposed development and additional receptors were included to consider cumulative noise impacts. As detailed above TNEI propose to use the background noise data previously collected to set the noise limits.

As detailed above wind speed was measured at various heights using a temporary meteorological mast which was located on the proposed development site. The data collected at 50 m and 70 m height was used to calculate hub height wind speeds (114 m) which were then standardised to 10 m height, in accordance with current good practice. Analysis of the measured data was undertaken in accordance with ETSU-R-97 and current good practice to determine the pre-existing background noise environment and to establish the daytime and night-time noise limits.

Having due regard to the guidance in ETSU-R-97 and the draft layout for the proposed development, at the two locations where background noise levels have been undertaken, some preliminary Total ETSU-R-97 Noise limit have been derived for information purposes. Once the Total ETSU-R-97 Noise limits have been finalised a set of Site Specific Noise Limits will be derived for each receptor for the daytime and night time period. At other receptors, where the baseline data collected at Bhlaraidh or Levishie is not deemed a suitable proxy or where noise limits have not already been set, it is proposed that the noise limits will be set based on the simplified ETSU-R-97 Noise Criterion of *35 dB(A)  $L_{90,10min}$  up to wind speeds of 10 m/s at 10 m height*.

Predictions of wind turbine noise for the proposed development were made, based upon the sound power level data for a candidate wind turbine, the GE 158, 5.3 MW. This wind turbine model has been chosen as it is considered to be representative of the type of turbine that could be installed at the site. Whatever the final turbine choice is, the proposed development would have to meet the noise limits determined and contained within any condition applied as part of the consent. Modelling was undertaken using the ISO 9613: 1996 'Acoustics – Attenuation of sound during propagation outdoors Part 2: General method of calculation' noise prediction model which accords with current good practice and is considered to provide a realistic impact assessment. For the other schemes, predictions have been undertaken using sound power level data for the installed turbines or a suitable candidate. The model of turbine was either identified through an online search, or through the use of Highland Council's Planning Application Portal.

The likely cumulative assessment shows that the proposed development can operate concurrently with the proposed, consented and operational wind farms in the area, whilst still meeting the Total ETSU-R-97 Noise limits at all receptors except NAL6 (See Figures A1.4a-g). At NAL6 there is a slight exceedance of the limits but this is based on a draft Fasnakyle Wind Farm (which is the dominant development) so this is subject to change. It should also be noted that the likely contribution of the proposed development is negligible at this location (with predicted noise levels being nearly 20 dB(A) below the Total ETSU-R-97 Noise Limits) and on that basis it may be scoped out of the final assessment.

A set of preliminary Site Specific Noise Limits have also been derived which take account (where required) of the other wind farm developments. The process to derive the Site Specific Noise Limits at each NAL was as follows:

NAL1 and NAL2 – Bhlaraidh Wind Farm has a noise limit set at the receptors based on 35dB(A)  $L_{90}$ . On that basis the predicted noise levels for Bhlaraidh have been increased to meet the noise limits. The increase in level has been determined based on the minimum difference (seen at 8m/s) between the predicted level and the 35 dB limit and that difference has been applied across all wind speeds. For all other developments there is significant headroom at these properties so cautious predictions have been undertaken by adding 2 dB to the likely levels. The resulting cautious predictions for all other schemes have then been logarithmically subtracted from the Total ETSU-R-97 Noise Limit to determine the Site Specific Noise Limit for the proposed development.

NAL3 and 5 - The noise predictions for the other proposed and operational schemes show that there is, in theory, significant headroom between the likely predicted levels and the Total ETSU-R-97 Noise Limit (>5 dB). In accordance with Section 5.4.11 of the IOA GPG, a 2 dB buffer has been added to the turbine noise predictions for each of the other developments; this is considered to be a suitable buffer in accordance with the IOA GPG and would represent a 60% increase in emitted noise levels from the other schemes. The resulting cautious predictions of cumulative wind turbine noise have then been logarithmically subtracted from the Total ETSU-R-97 Noise Limit to determine the Site Specific Noise Limit for the proposed development.

NAL4 and 7 - The likely predictions level from other schemes were found to be more than 10 dB below the Total ETSU-R-97 Noise Limits and as such the entire noise limits has been allocated to the proposed development.



NAL6 - The likely predictions level from other schemes were found to equal the Total ETSU-R-97 Noise Limits, however the proposed development is having a negligible contribution.

A set of figures showing the preliminary Site Specific Noise Limits and predictions from the proposed development against the limits are included as Figures A1.5a-g in Annex 1.

Please note that the wind farm layout is still subject to change but we were keen to get your thoughts at this early stage on our proposed methodology for the noise assessment. To enable us to progress the assessment we would be very grateful if you confirm whether:

- You agree with our proposed approach to use the previously collected baseline noise data at Bhlaraidh and Levishie to set noise limits;
- You agree with the general approach we are proposing to set noise Total and Site Specific Noise Limits at the nearest receptors;
- The Council is aware of any schemes which should be included in the cumulative noise assessment or any other dwellings which should be considered; and
- You agree that a vibration assessment is not required.

If you have any immediate concerns or queries, please do not hesitate to contact me or my colleague James Mackay. We look forward to hearing from you soon.

Yours sincerely,



Gemma Clark  
BSc(Hons), MSc, AMIOA

**Principal Consultant**



Tel: 

Reviewed and approved by:



James Mackay  
BSc(Hons), Dip, MIOA

**Director of Environment & Engineering**



Tel: 

Enc.

Figure A1.1 - Noise Monitoring and Assessment and Turbine Locations

Figure A1.2a-b – Regression Analysis Graphs

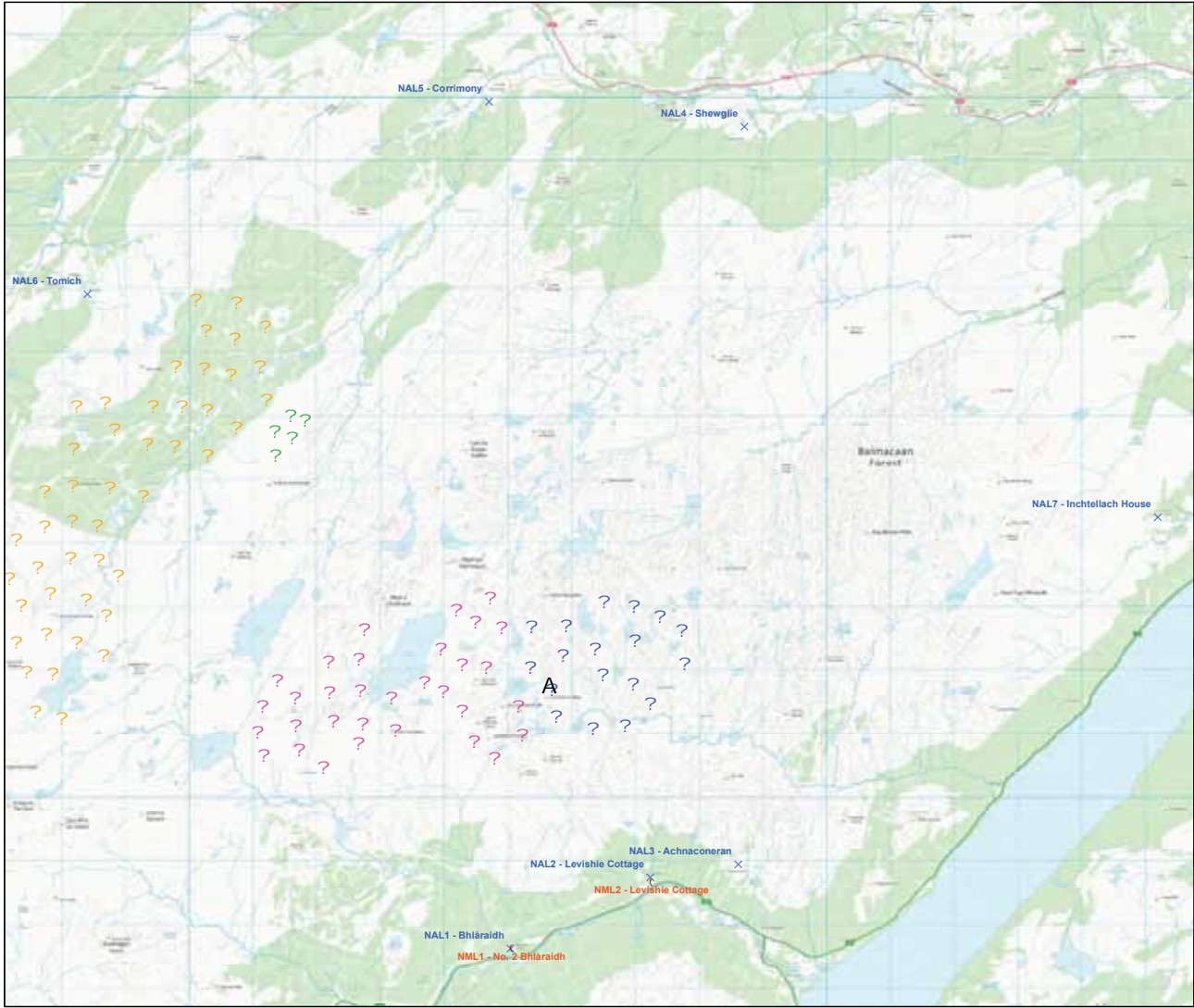
Figure A1.3a-b – Time Series Graphs

Figure A1.4a-b – Cumulative Predictions – Likely Effects

Figure A1.5a-b – Site Specific Noise Modelling

## Annex 1: Figures

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**Legend**

- Noise Monitoring Location
- Noise Assessment Location
- Met Mast Location

**Cumulative Turbine Location**

- Bhlaraidh
- Bhlaraidh Ext
- Corrimony
- Fasnakyle

0 1,000 2,000 Metres

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| NO  | FIRST ISSUE | GC    | JM    | JM   | 15/05/2020 |
|-----|-------------|-------|-------|------|------------|
| REV | DETAILS     | DRAWN | CHECK | APPD | DATE       |

**Project** Bhlaraidh Extension Wind Farm



**Client** SSE Renewables

**Title** Noise Monitoring, Assessment and Wind Farm Locations

**Figure No.** A1.1

**Scale** 1:55,000 @A3

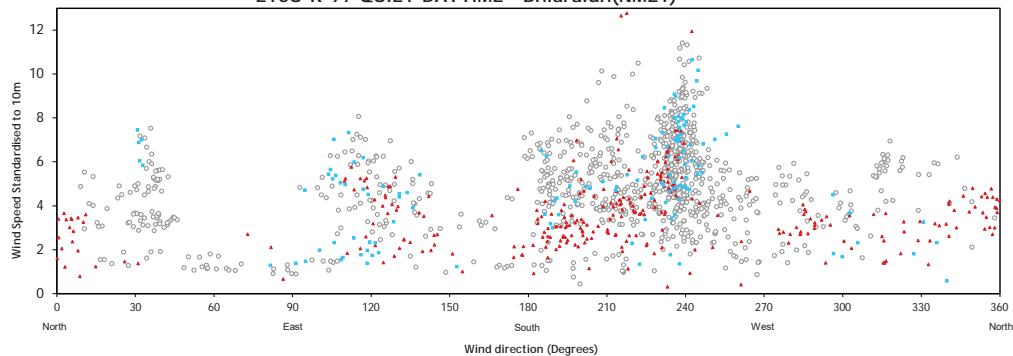
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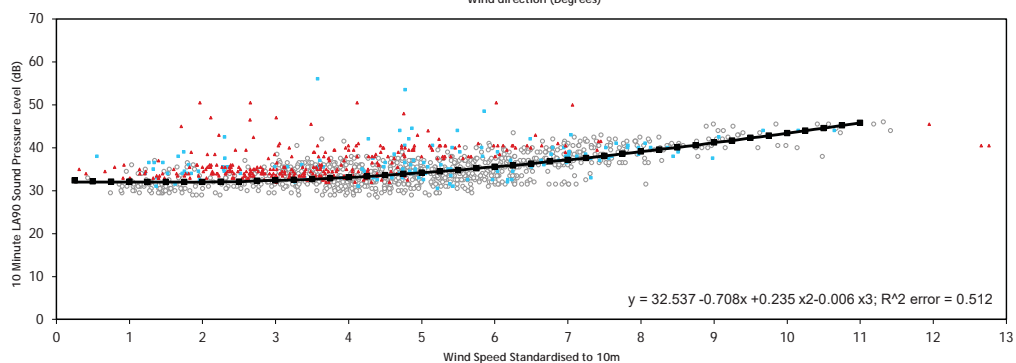


### ETSU-R-97 QUIET DAYTIME - Bhlaraidh(NML1)

#### Wind Conditions Quiet Daytime



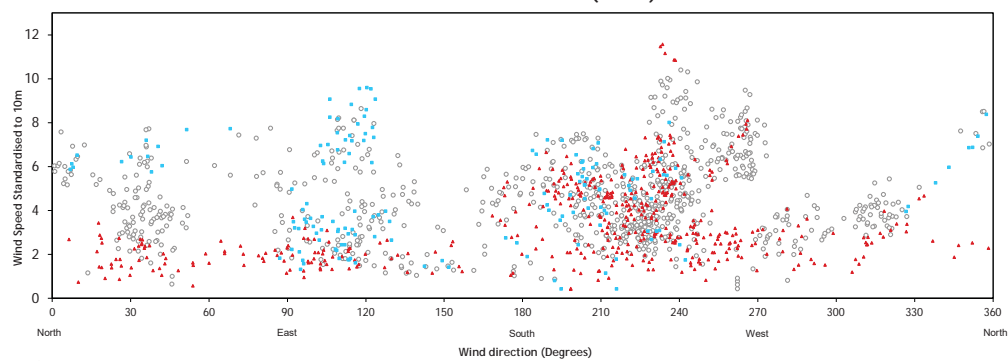
#### Regression Analysis Quiet Daytime



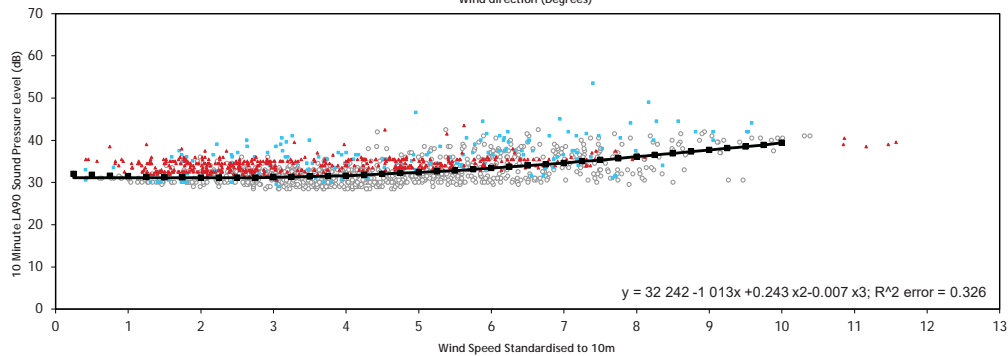
| Wind Speed (m/s)      | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12 | Total |
|-----------------------|----|------|------|------|------|------|------|------|------|------|----|-------|
| Number of data points | 48 | 103  | 183  | 179  | 166  | 101  | 44   | 24   | 8    | 6    | 0  | 862   |
| Prevailing Background | 32 | 32.4 | 33.1 | 34.2 | 35.6 | 37.2 | 39.1 | 41.2 | 43.4 | 45.8 | -  |       |

### ETSU-R-97 NIGHT-TIME - Bhlaraidh(NML1)

#### Wind Conditions Night-Time



#### Regression Analysis Night-Time



| Wind Speed (m/s)      | 2    | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11 | 12 | Total |
|-----------------------|------|------|------|------|------|------|------|------|------|----|----|-------|
| Number of data points | 74   | 176  | 187  | 137  | 113  | 69   | 39   | 20   | 8    | 0  | 0  | 823   |
| Prevailing Background | 31.1 | 31.2 | 31.6 | 32.4 | 33.4 | 34.6 | 36.1 | 37.7 | 39.4 | -  | -  |       |

#### Legend:

- LA90 10 Minute Measurement Point
- Line of best fit
- Line of best fit flat lined where appropriate(Prevailing Background)
- Excluded Data-Manual exclusion
- Excluded Data-Rain

Project: Bhlaraidh Wind Farm Extension

Client: SSE Renewables

Title: Wind Conditions&Regression Analysis

Figure Number: A1.2a

Drawn: GC

Checked: JM

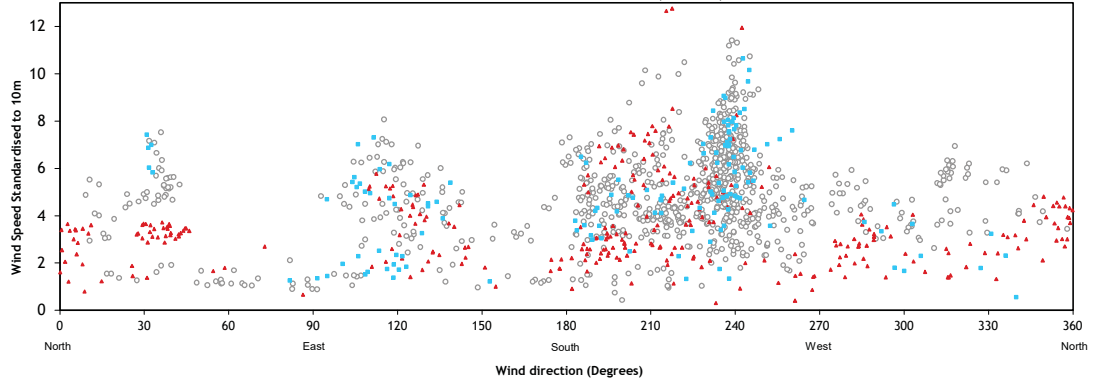
Date: 14/05/2020

Document Reference: 13813-RA

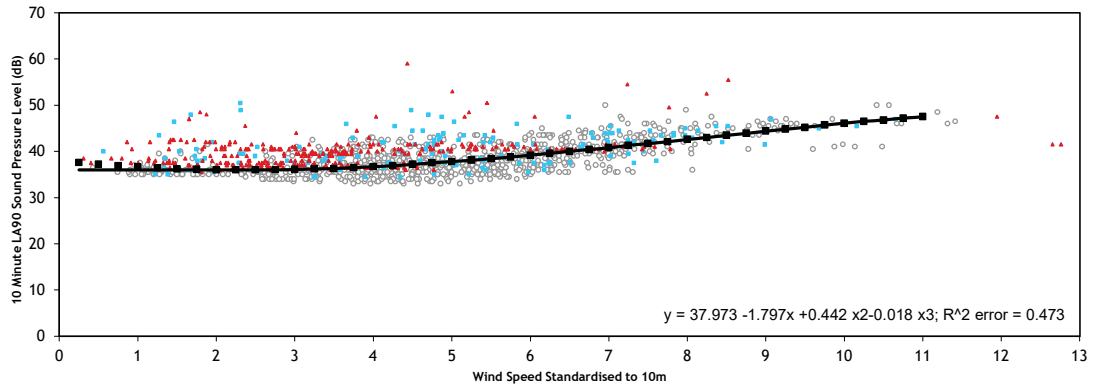


### ETSU-R-97 QUIET DAYTIME - Levishie(NML2)

Wind Conditions Quiet Daytime



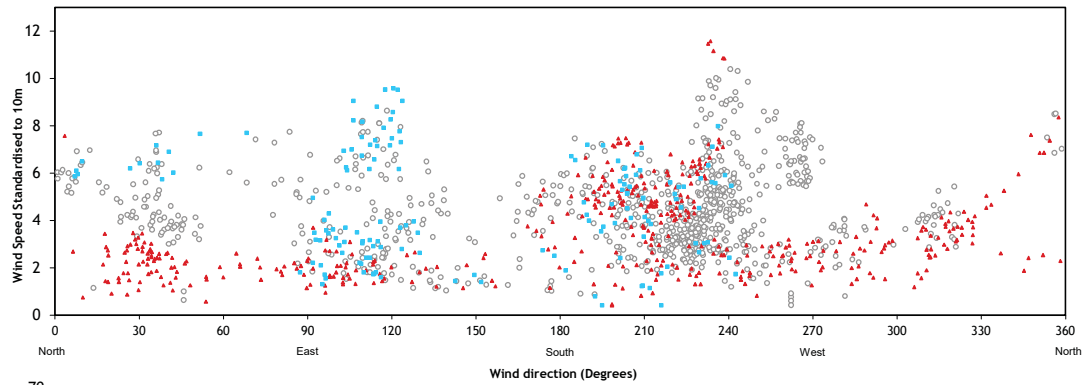
Regression Analysis Quiet Daytime



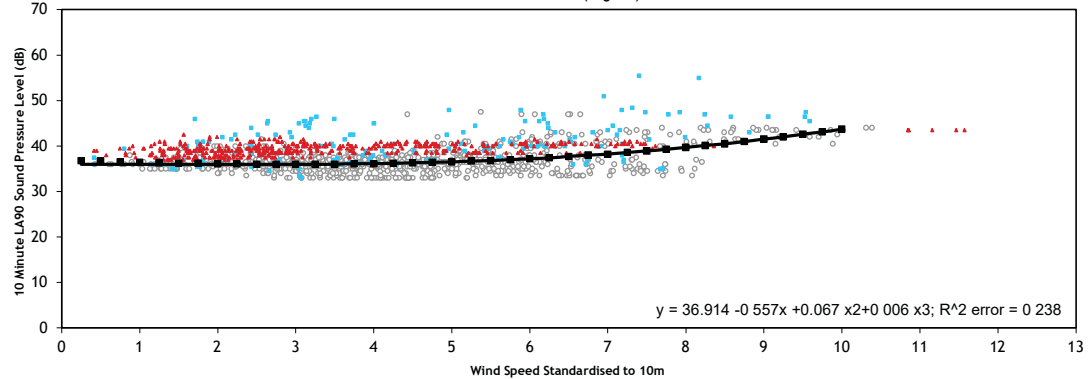
| Wind Speed (m/s)      | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12 | Total |
|-----------------------|----|------|------|------|------|------|------|------|------|------|----|-------|
| Number of data points | 38 | 91   | 202  | 182  | 165  | 100  | 39   | 23   | 8    | 6    | 0  | 854   |
| Prevailing Background | 36 | 36.1 | 36.7 | 37.8 | 39.2 | 40.8 | 42.6 | 44.4 | 46.1 | 47.5 | -  |       |

### ETSU-R-97 NIGHT-TIME - Levishie(NML2)

Wind Conditions Night-Time



Regression Analysis Night-Time



| Wind Speed (m/s)      | 2  | 3   | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11 | 12 | Total |
|-----------------------|----|-----|------|------|------|------|------|------|------|----|----|-------|
| Number of data points | 77 | 174 | 190  | 155  | 110  | 61   | 29   | 16   | 8    | 0  | 0  | 820   |
| Prevailing Background | 36 | 36  | 36.1 | 36.5 | 37.2 | 38.2 | 39.7 | 41.5 | 43.7 | -  | -  |       |

#### Legend:

- L<sub>90</sub> 10 Minute Measurement Point
- Line of best fit
- Line of best fit flat lined where appropriate(Prevailing Background)
- Excluded Data-Manual exclusion
- Excluded Data-Rain

Project Bhlaraidh Wind Farm Extension

Client SSE Renewables

Title Wind Conditions&Regression Analysis

Figure Number A1.2b

Drawn GC

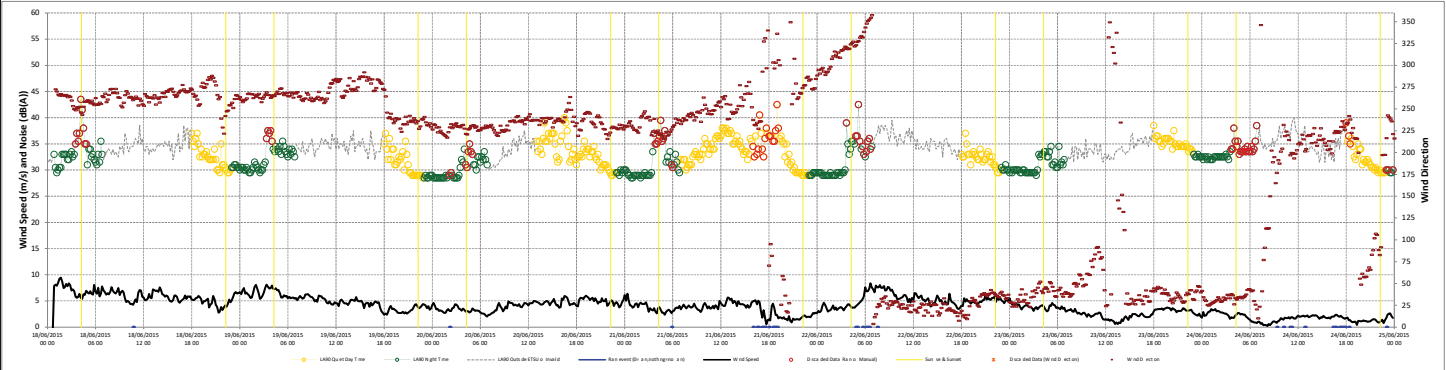
Checked JM

Date 15/05/2020

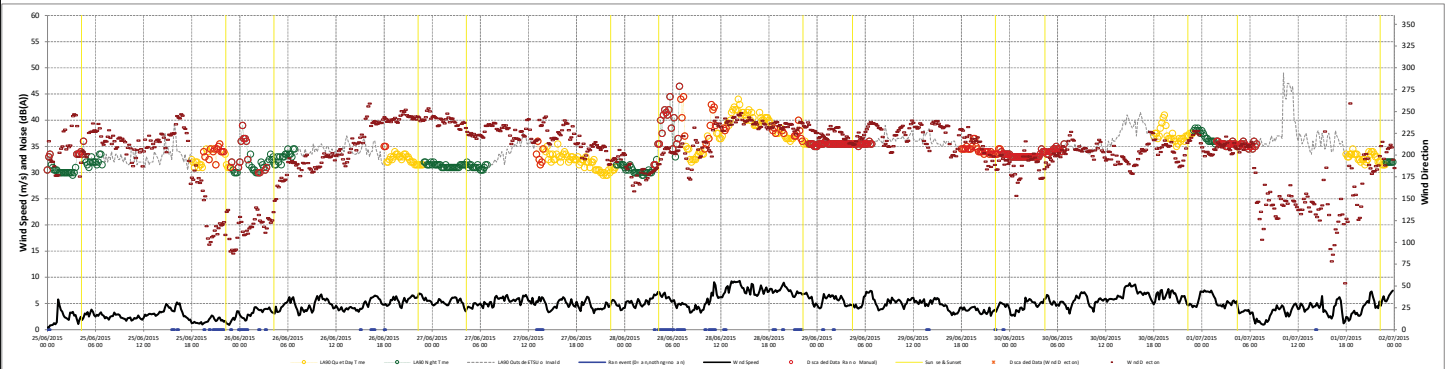
Document Reference 13813-RA



18/06/2015 to 25/06/2015



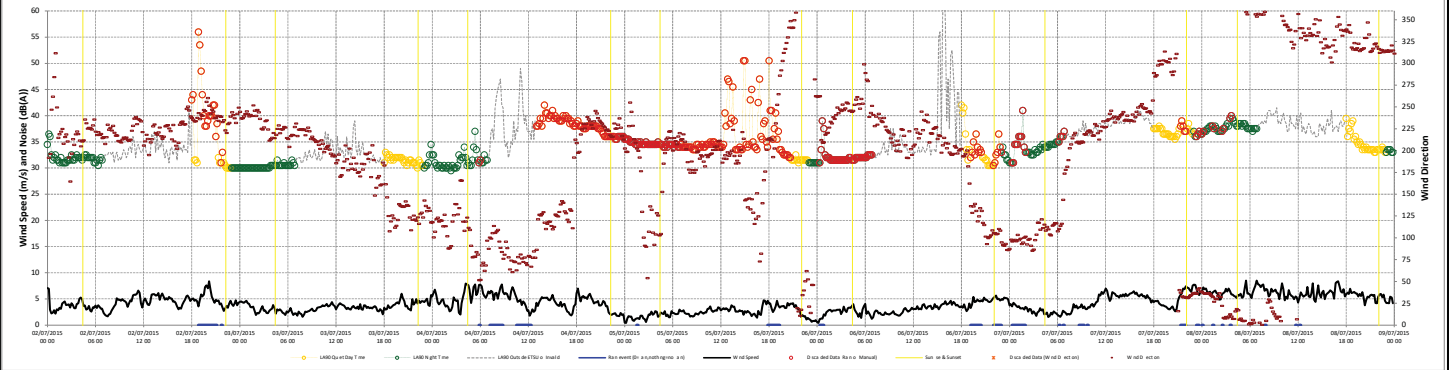
25/06/2015 to 02/07/2015



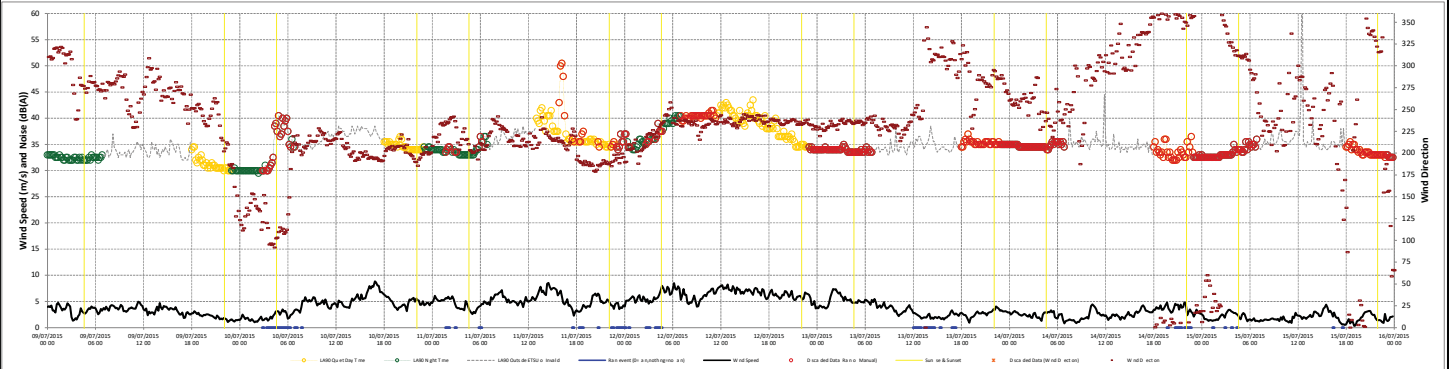
|         |                                       |              |
|---------|---------------------------------------|--------------|
| Project | Bhlaraith Wind Farm Extension         |              |
| Client  | SSE Renewables                        | Figure A1.3a |
| Title   | Time Series for Bhlaraith Page 1 of 3 |              |
| Date    | 14/05/2020                            |              |



02/07/2015 to 09/07/2015



09/07/2015 to 16/07/2015



Project Bhlaraidh Wind Farm Extension

Client SSE Renewables

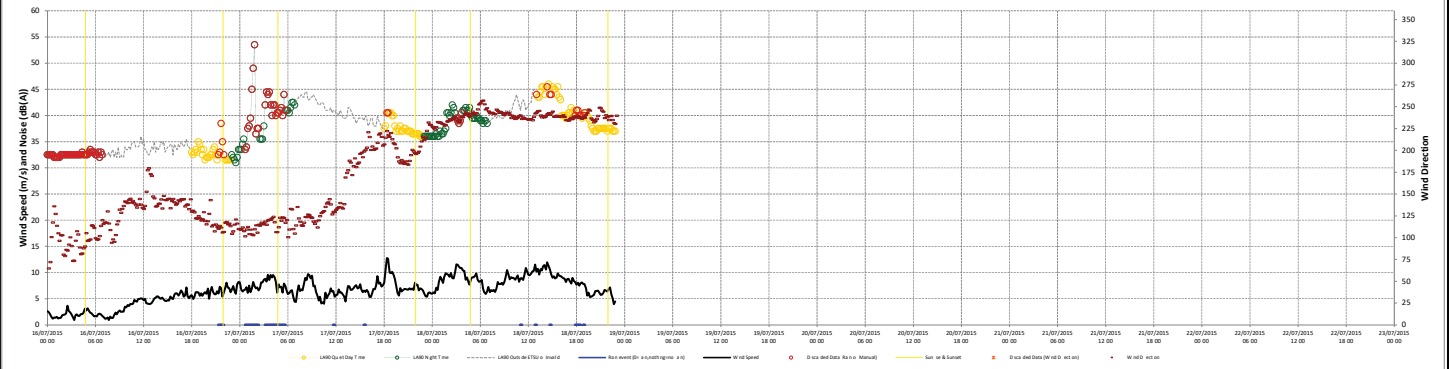
Figure A1.3a


Title Time Series for Bhlaraidh Page 2 of 3

Date 14/05/2020

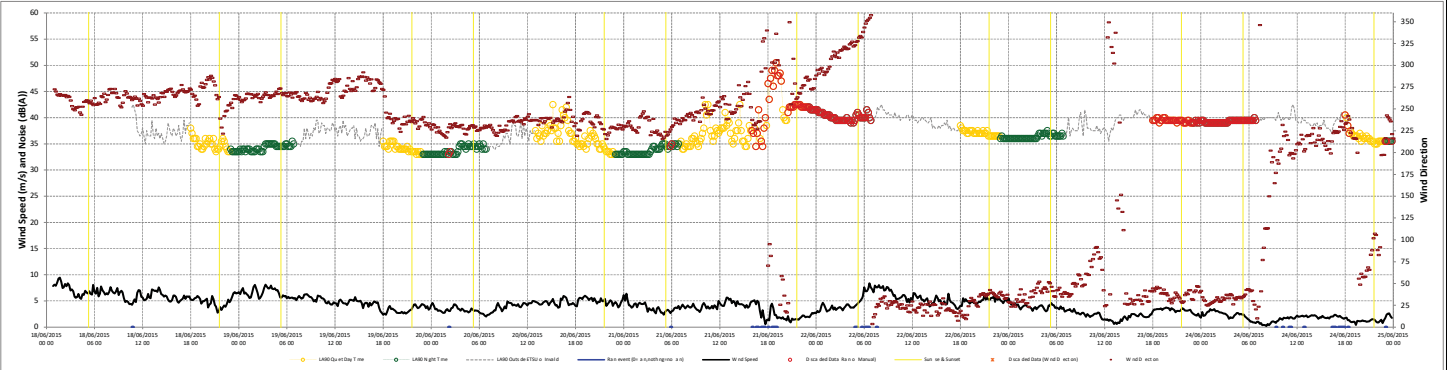


16/07/2015 to 23/07/2015

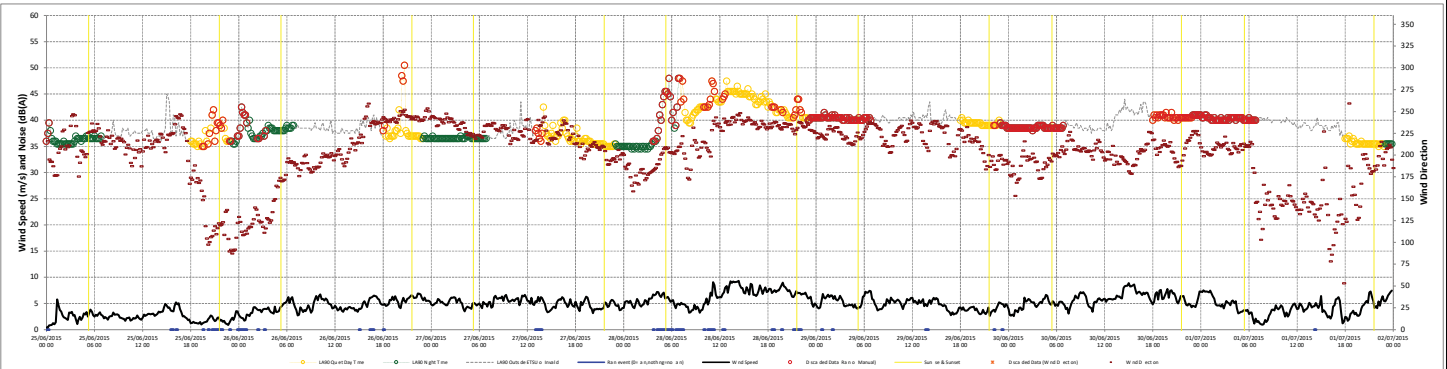


|  |   |  |
|--|---|--|
|  | <div>Project</div> <div>Bhlairaidh Wind Farm Extension</div> <div>Client</div> <div>SSE Renewables</div> <div>Title</div> <div>Time Series for Bhlairaidh Page 3 of 3</div> <div>Date</div> <div>14/05/2020</div> | <div>Figure A1.3a</div> <div></div> |
|--|---|--|

18/06/2015 to 25/06/2015



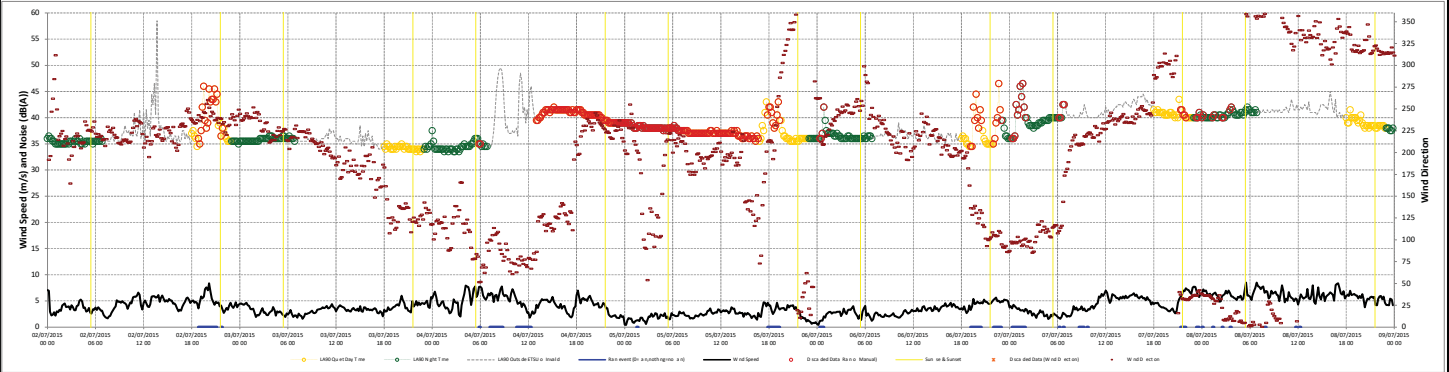
25/06/2015 to 02/07/2015



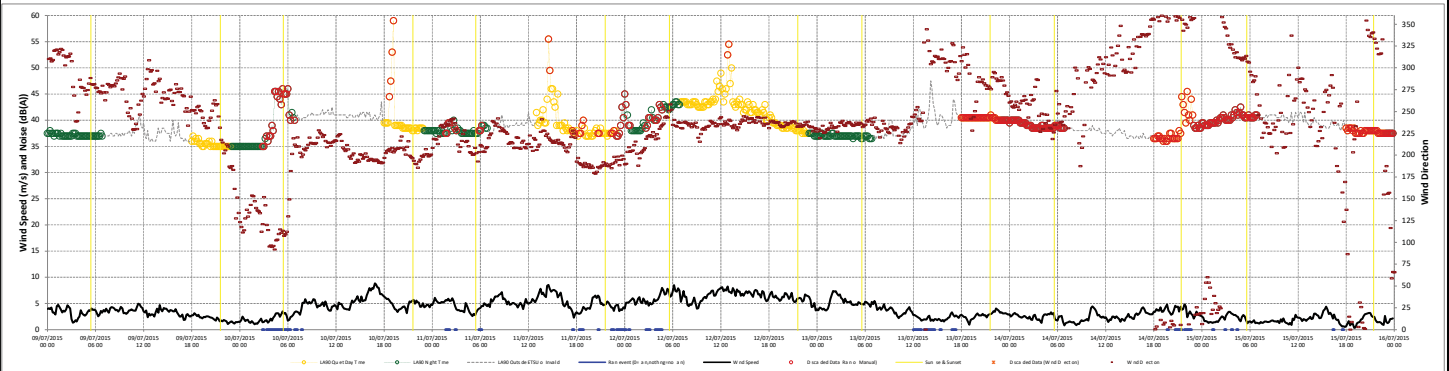
Project Bhlaraith Wind Farm Extension  
Client SSE Renewables  
Title Time Serie for Levislie Page 1 of 3  
Date 15/05/2020



02/07/2015 to 09/07/2015

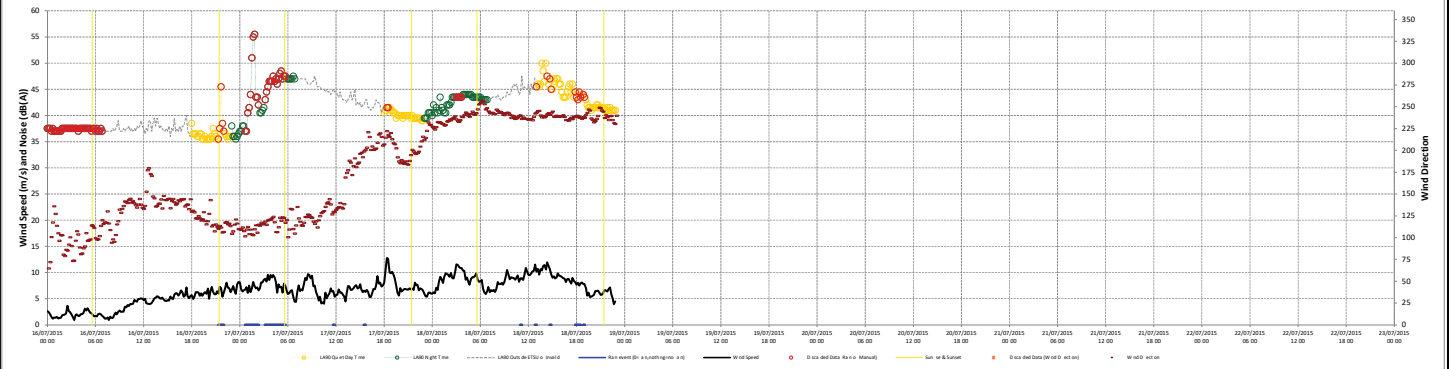


09/07/2015 to 16/07/2015



|  |         |                                     |   |
|--|---------|-------------------------------------|---|
|  | Project | Bhlaraidh Wind Farm Extension       |  |
|  | Client  | SSE Renewables                      |   |
|  | Title   | Time Serie for Levishie Page 2 of 3 |   |
|  | Date    | 15/05/2020                          |   |

16/07/2015 to 23/07/2015



Project Bhlairadh Wind Farm Extension

Client SSE Renewables

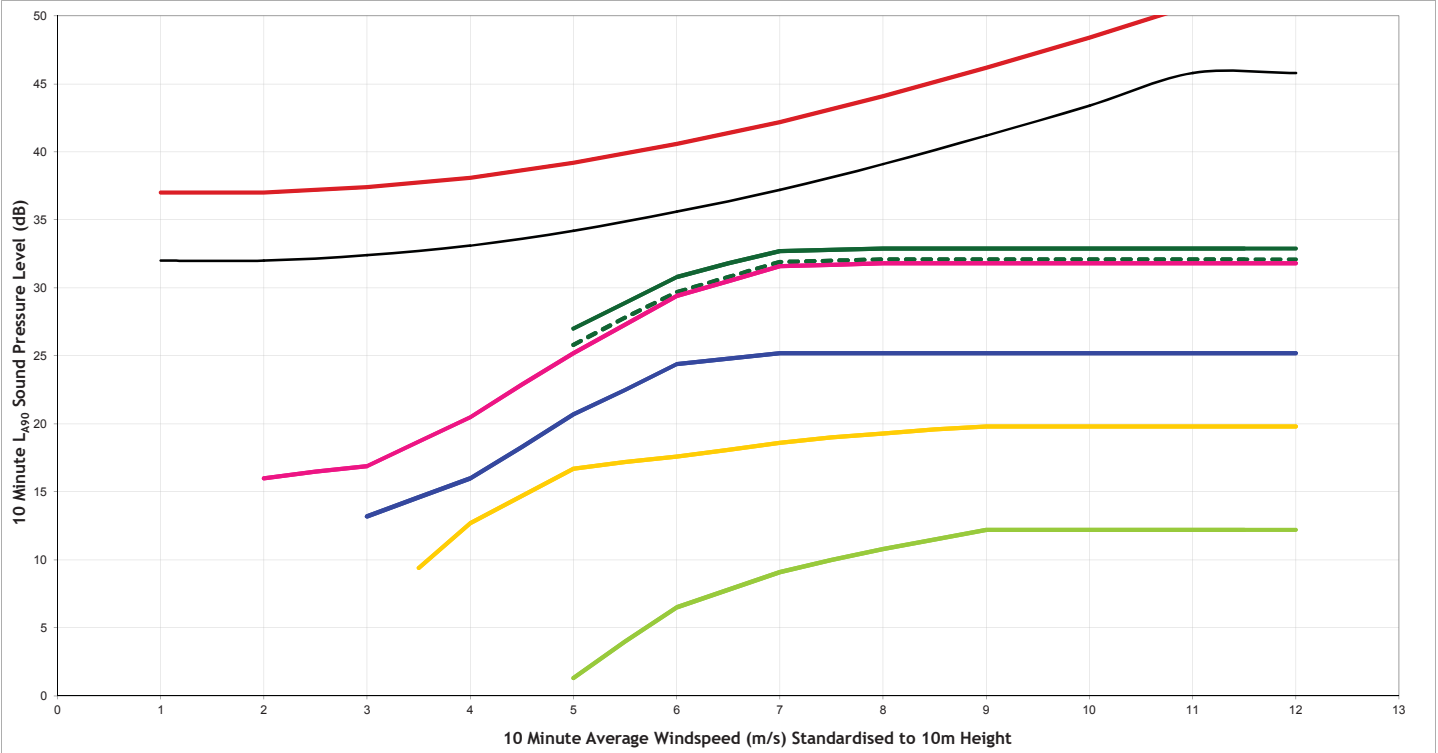
Title Time Serie for Levisihie Page 3 of 3

Date 15/05/2020

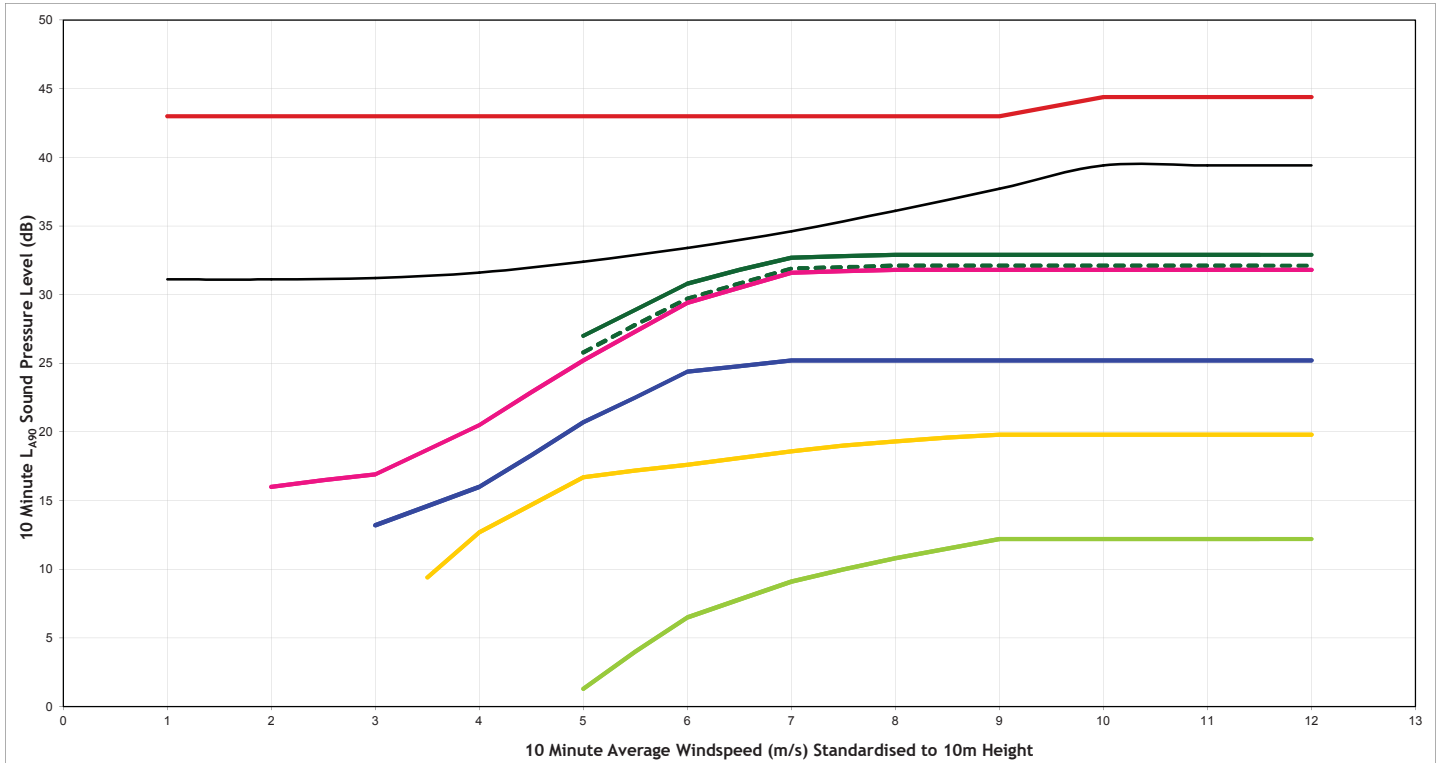




Quiet Daytime - Bhlàraidh (NAL1)



Night Time - Bhlàraidh (NAL1)



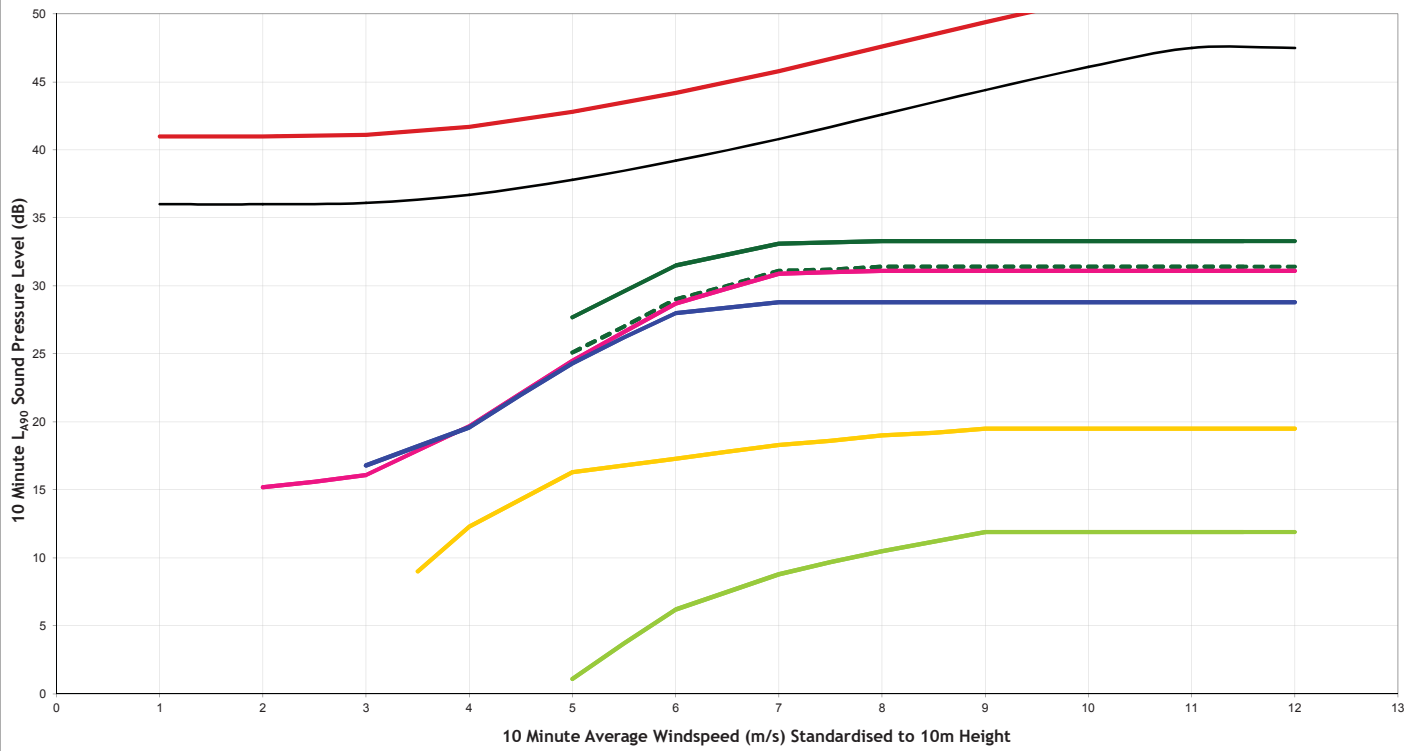
Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlàraidh Extension)
- Bhlàraidh Only
- Bhlàraidh Extension Only
- Corrimony Only
- Fasnakyle Only

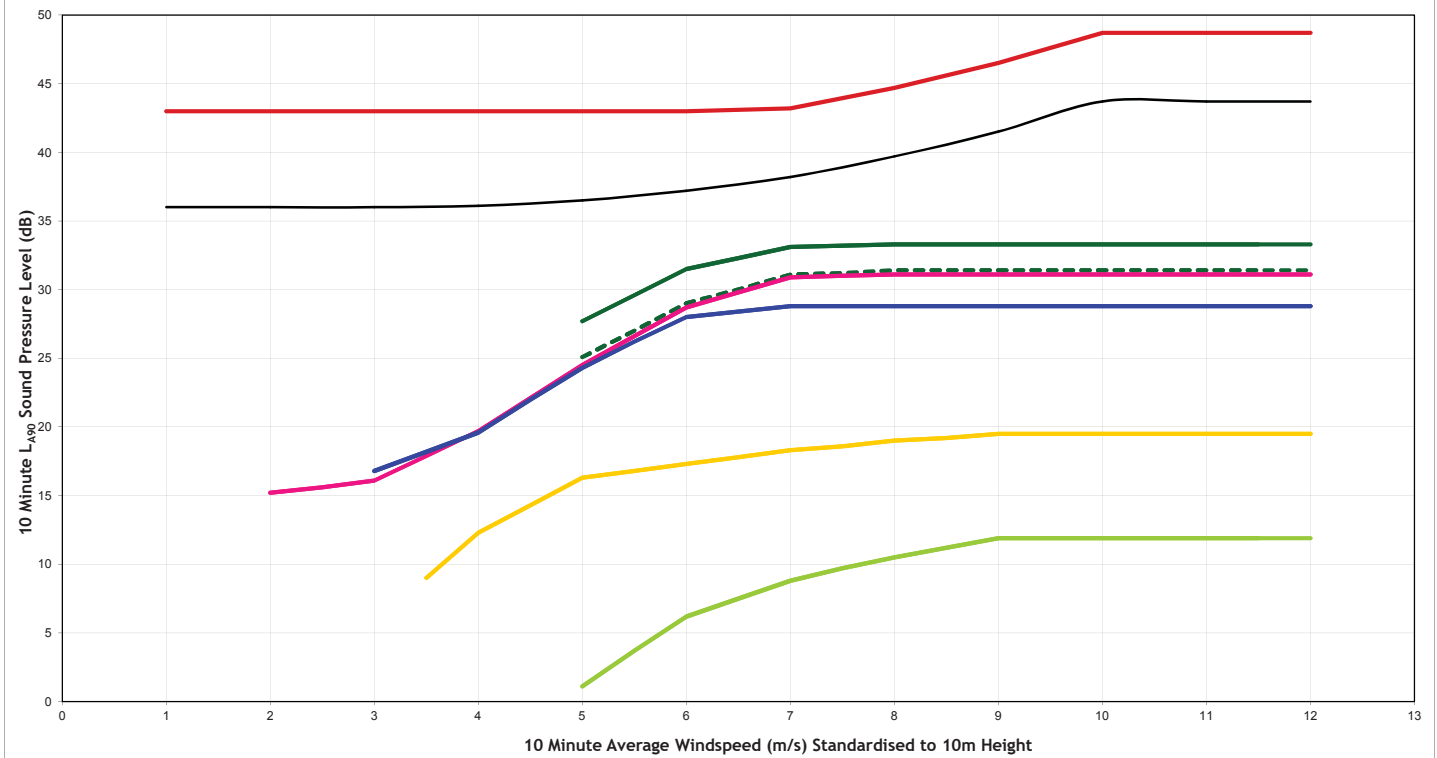
Project Bhlàraidh Extension Wind Farm  
 Client SSE Renewables  
 Title Noise Assessment  
 Bhlàraidh (NAL1)  
 Figure Number Figure A1 4a  
 Scale NTS  
 Drawn MT  
 Checked GC  
 Date 09/04/2020  
 Document Reference 13813-Models



### Quiet Daytime - Levishie Cottage (NAL2)



### Night Time - Levishie Cottage (NAL2)



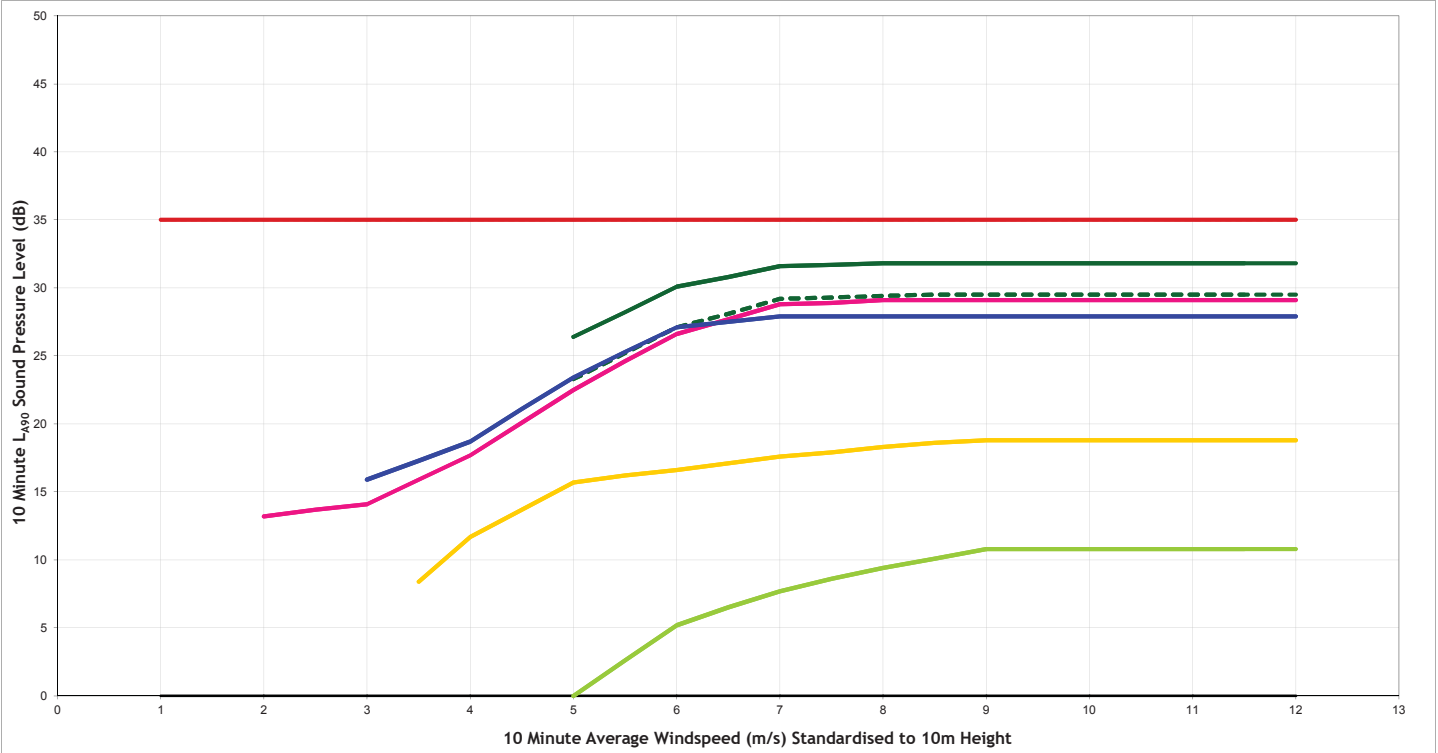
#### Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

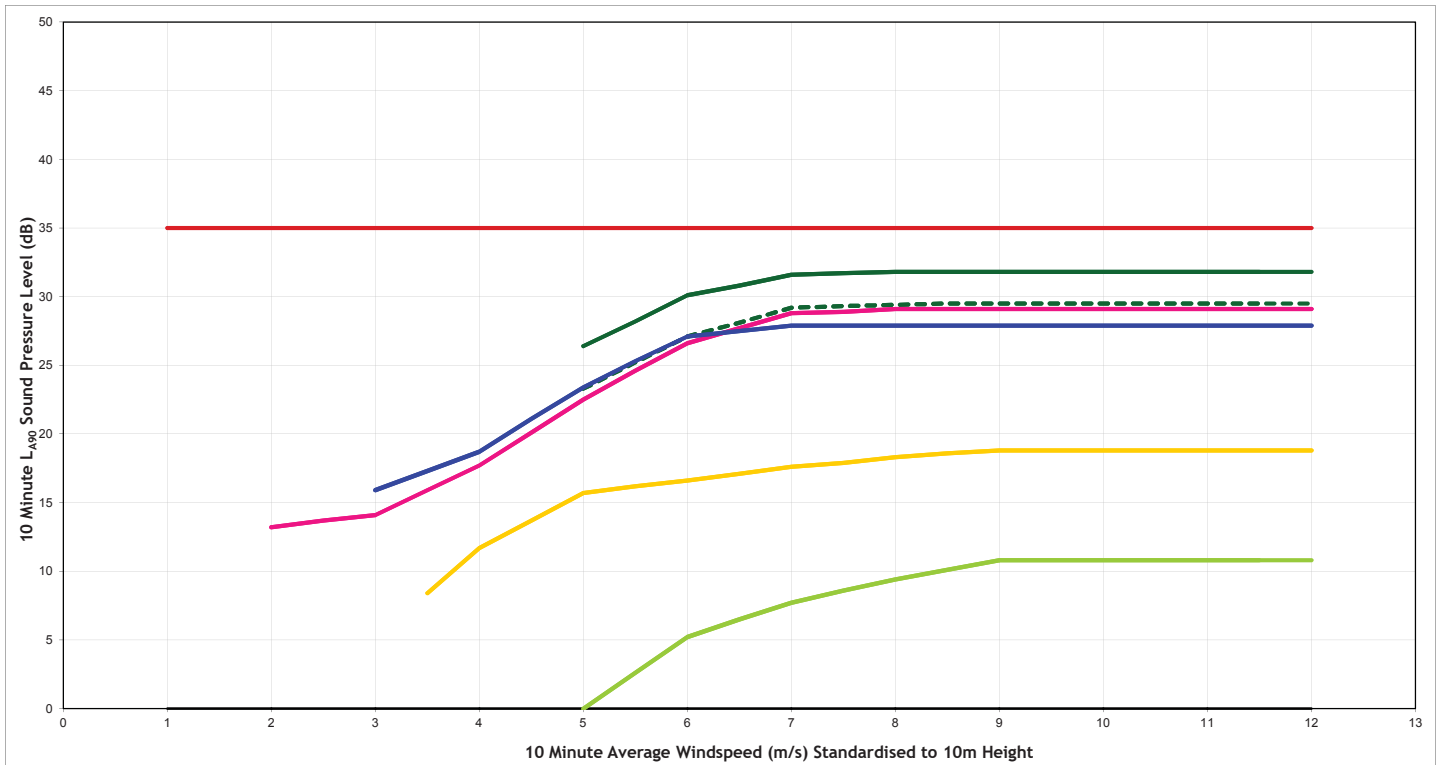
|                    |   |
|--------------------|---|
| Project            | Bhlaraidh Extension Wind Farm               |
| Client             | SSE Renewables                              |
| Title              | Noise Assessment<br>Levishie Cottage (NAL2) |
| Figure Number      | Figure A1 4b                                |
| Scale              | NTS   |
| Drawn              | MT  |
| Checked            | GC  |
| Date               | 09/04/2020                                  |
| Document Reference | 13813-Models                                |



### Quiet Daytime - Achnaconeran (NAL3)



### Night Time - Achnaconeran (NAL3)



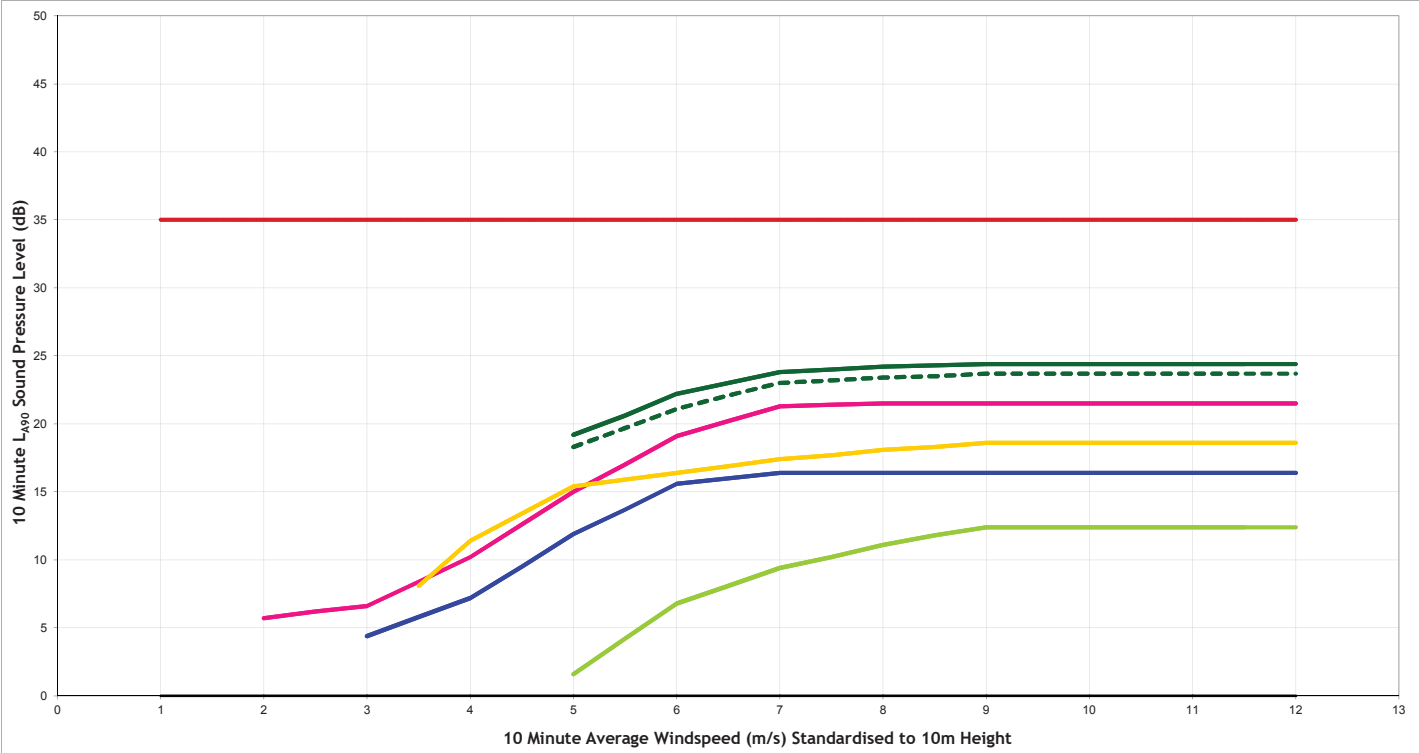
#### Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

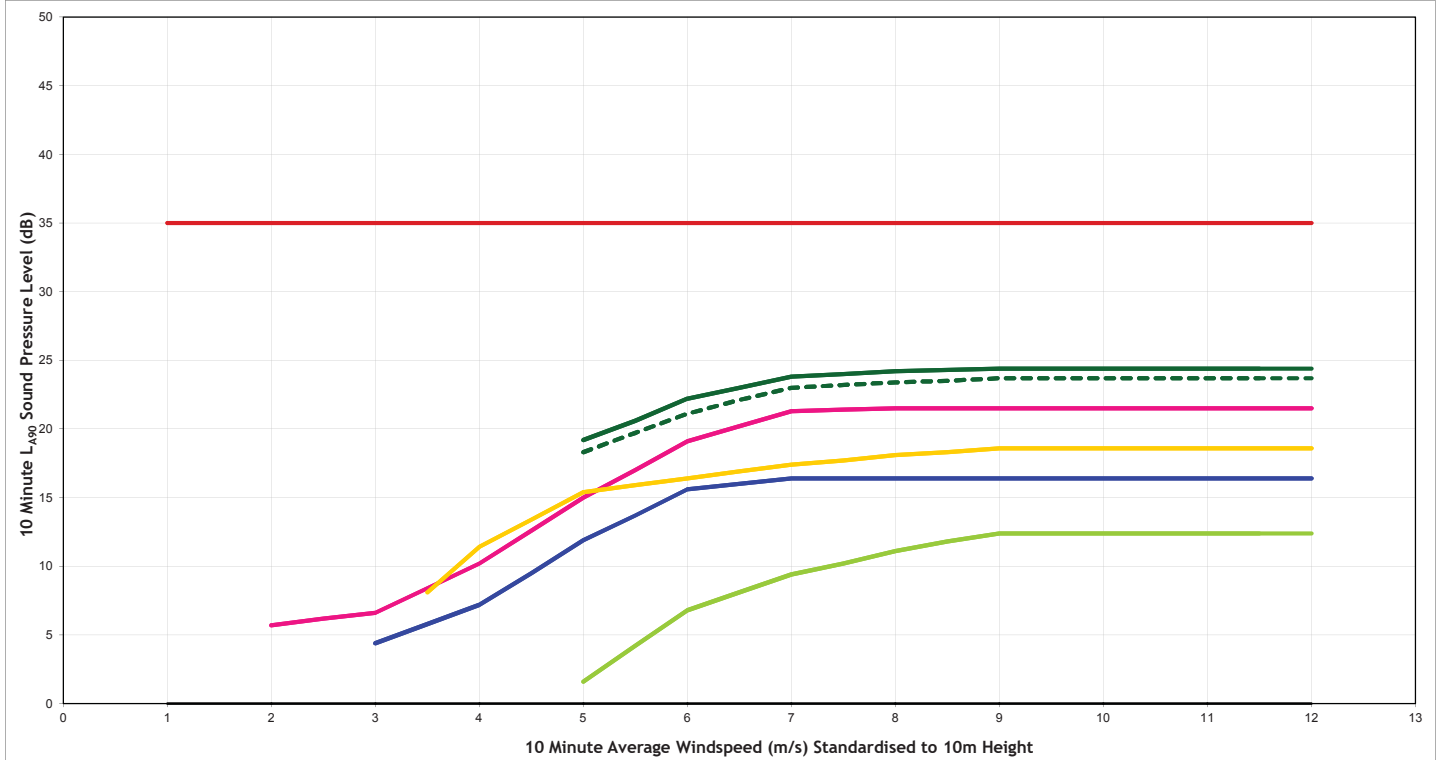
**Project** Bhlaraidh Extension Wind Farm  
**Client** SSE Renewables  
**Title** Noise Assessment  
 Achnaconeran (NAL3)  
**Figure Number** Figure A1 4c  
**Scale** NTS  
**Drawn** MT  
**Checked** GC  
**Date** 09/04/2020  
**Document Reference** 13813-Models



Quiet Daytime - Shewglie (NAL4)



Night Time - Shewglie (NAL4)



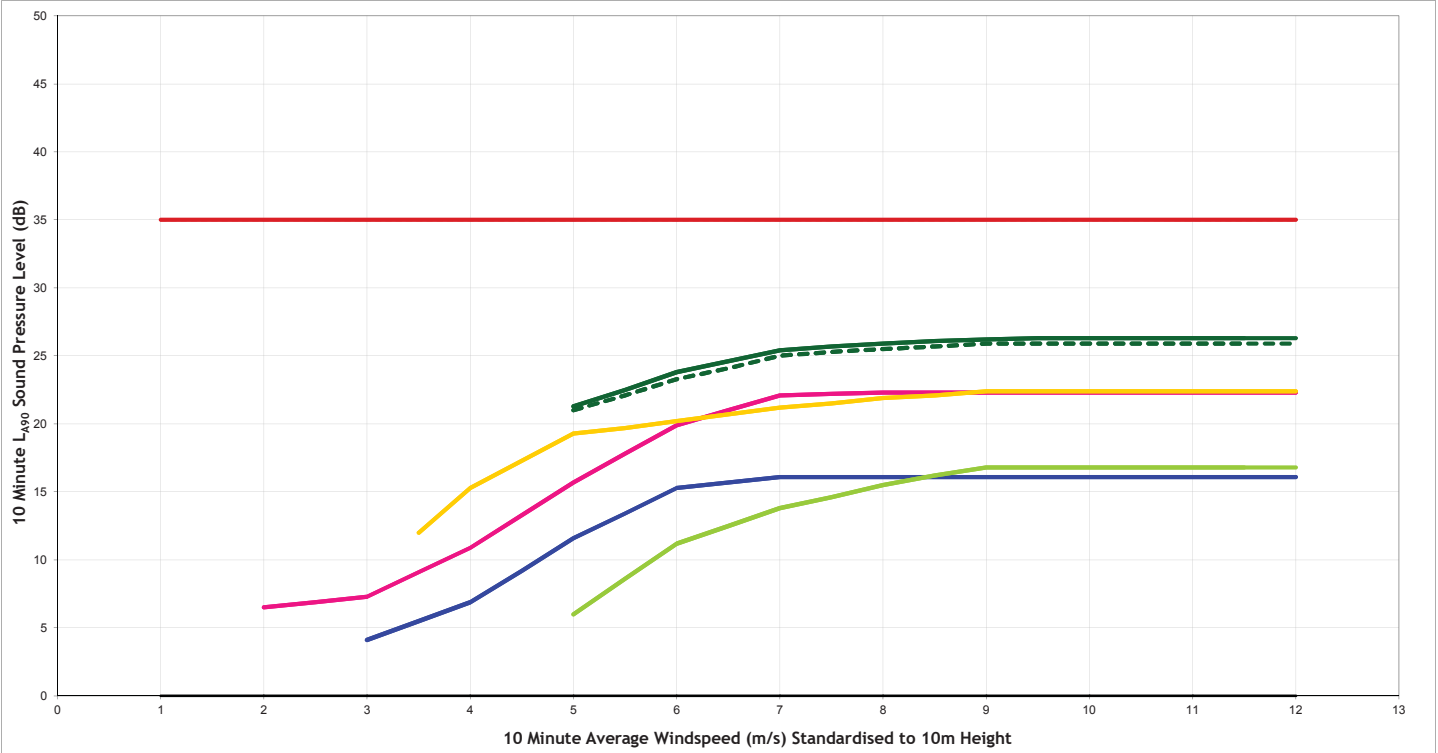
Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

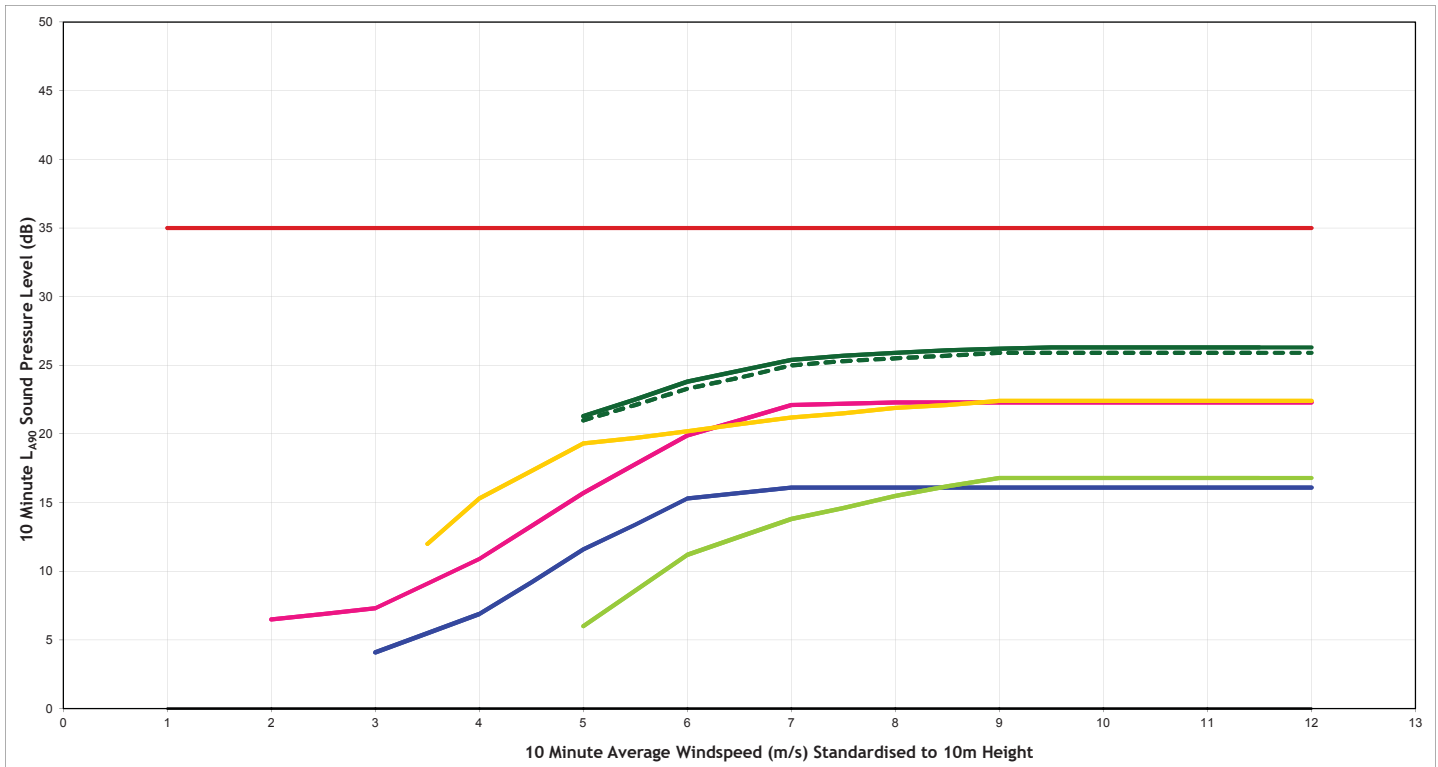
|                    |                                     |
|--------------------|-------------------------------------|
| Project            | Bhlaraidh Extension Wind Farm       |
| Client             | SSE Renewables                      |
| Title              | Noise Assessment<br>Shewglie (NAL4) |
| Figure Number      | Figure A1 4d                        |
| Scale              | NTS                                 |
| Drawn              | MT                                  |
| Checked            | GC                                  |
| Date               | 09/04/2020                          |
| Document Reference | 13813-Models                        |



### Quiet Daytime - Corrimony (NAL5)



### Night Time - Corrimony (NAL5)



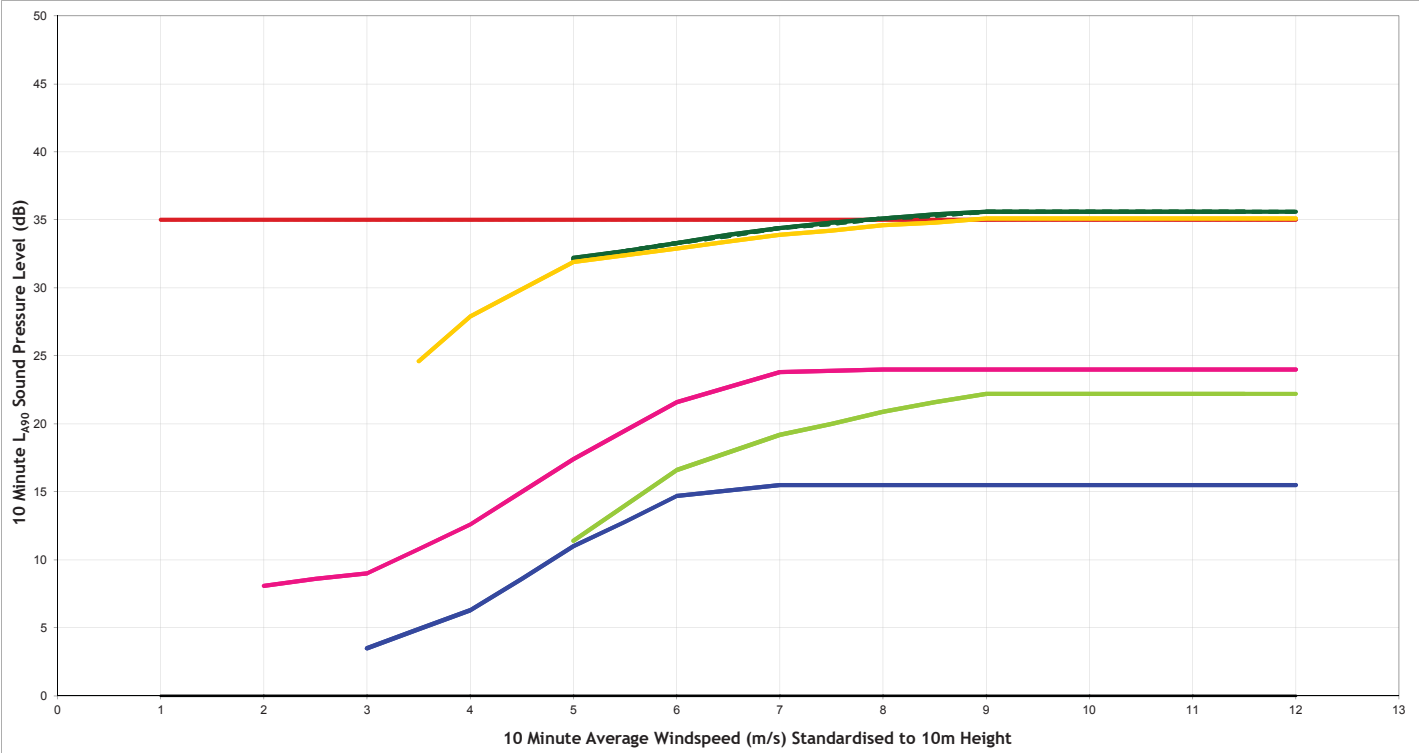
#### Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

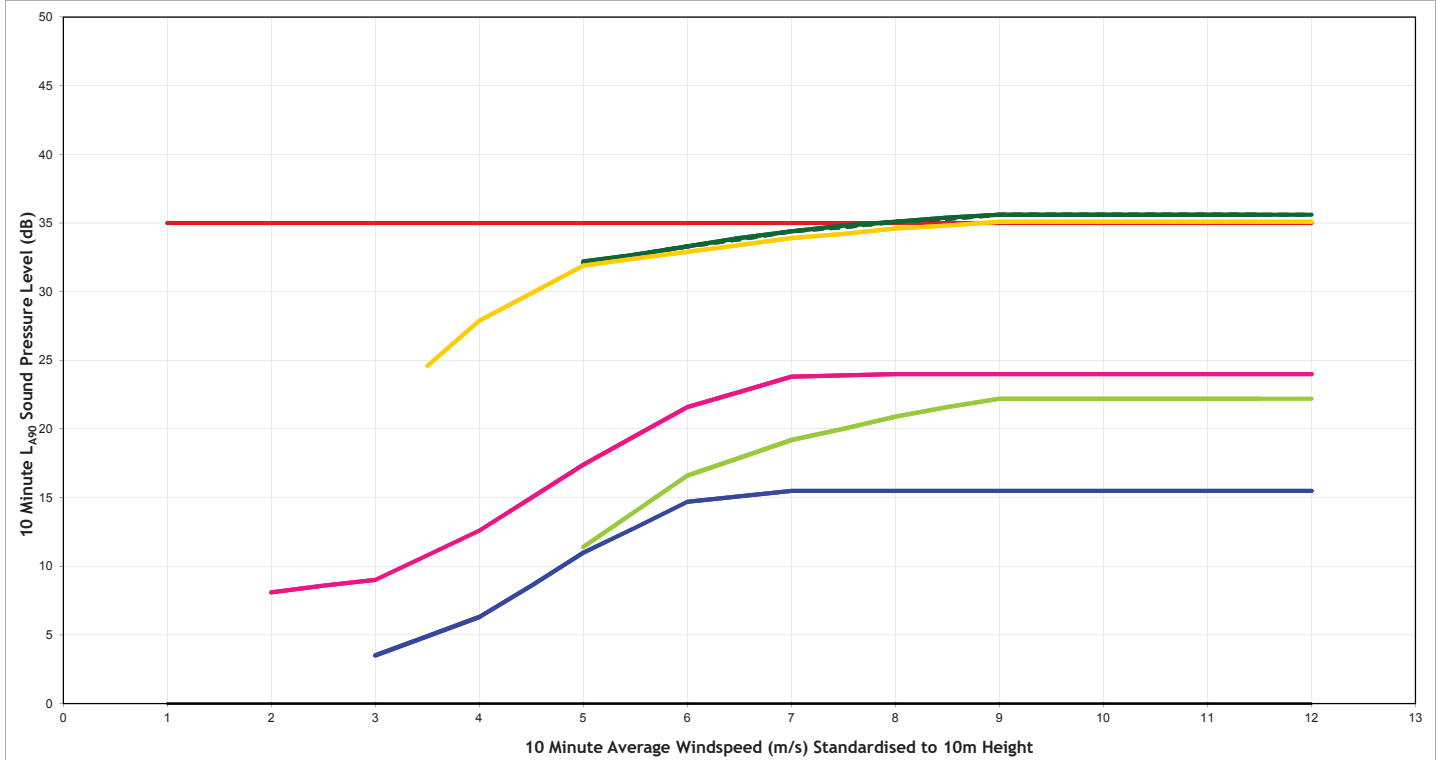
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| Project            | Bhlaraidh Extension Wind Farm        |
| Client             | SSE Renewables                       |
| Title              | Noise Assessment<br>Corrimony (NAL5) |
| Figure Number      | Figure A1 4e                         |
| Scale              | NTS                                  |
| Drawn              | MT                                   |
| Checked            | GC                                   |
| Date               | 09/04/2020                           |
| Document Reference | 13813-Models                         |



### Quiet Daytime - Tomich (NAL6)



### Night Time - Tomich (NAL6)



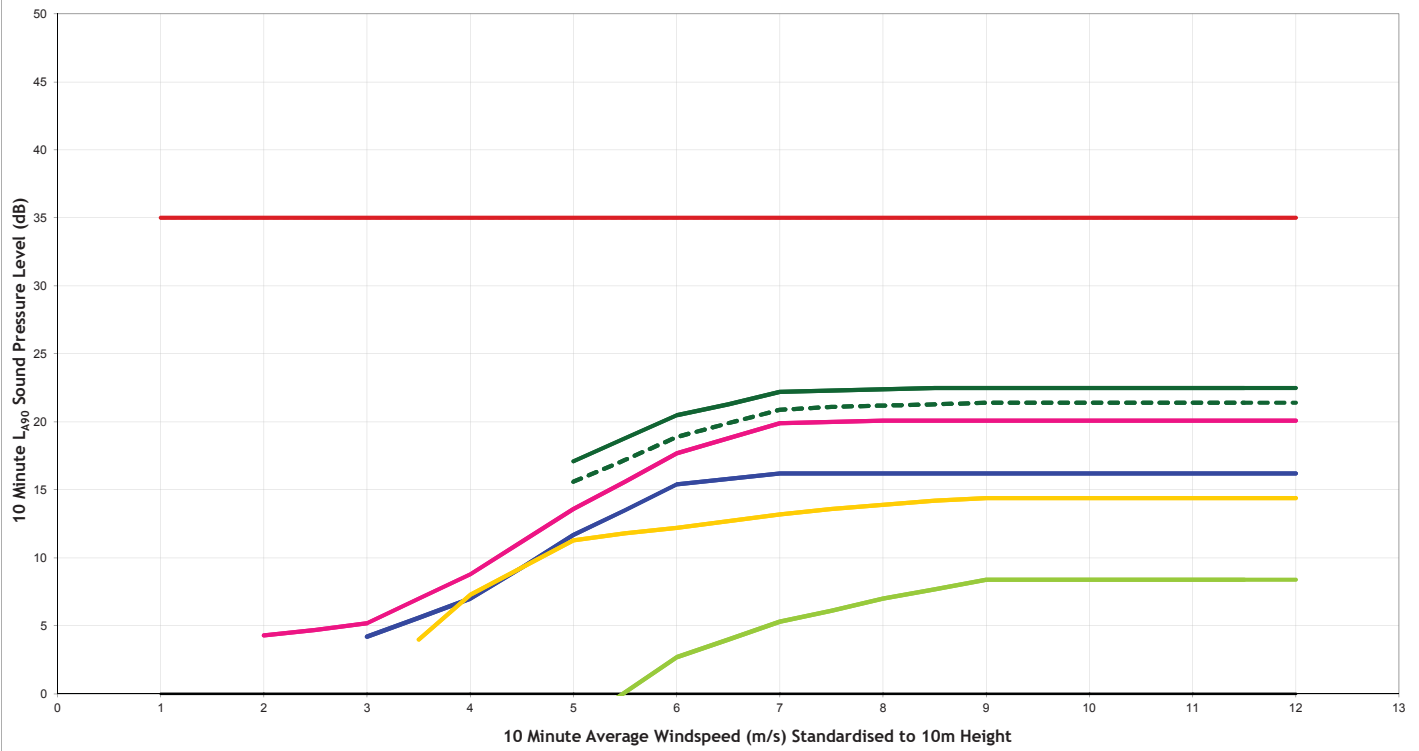
#### Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

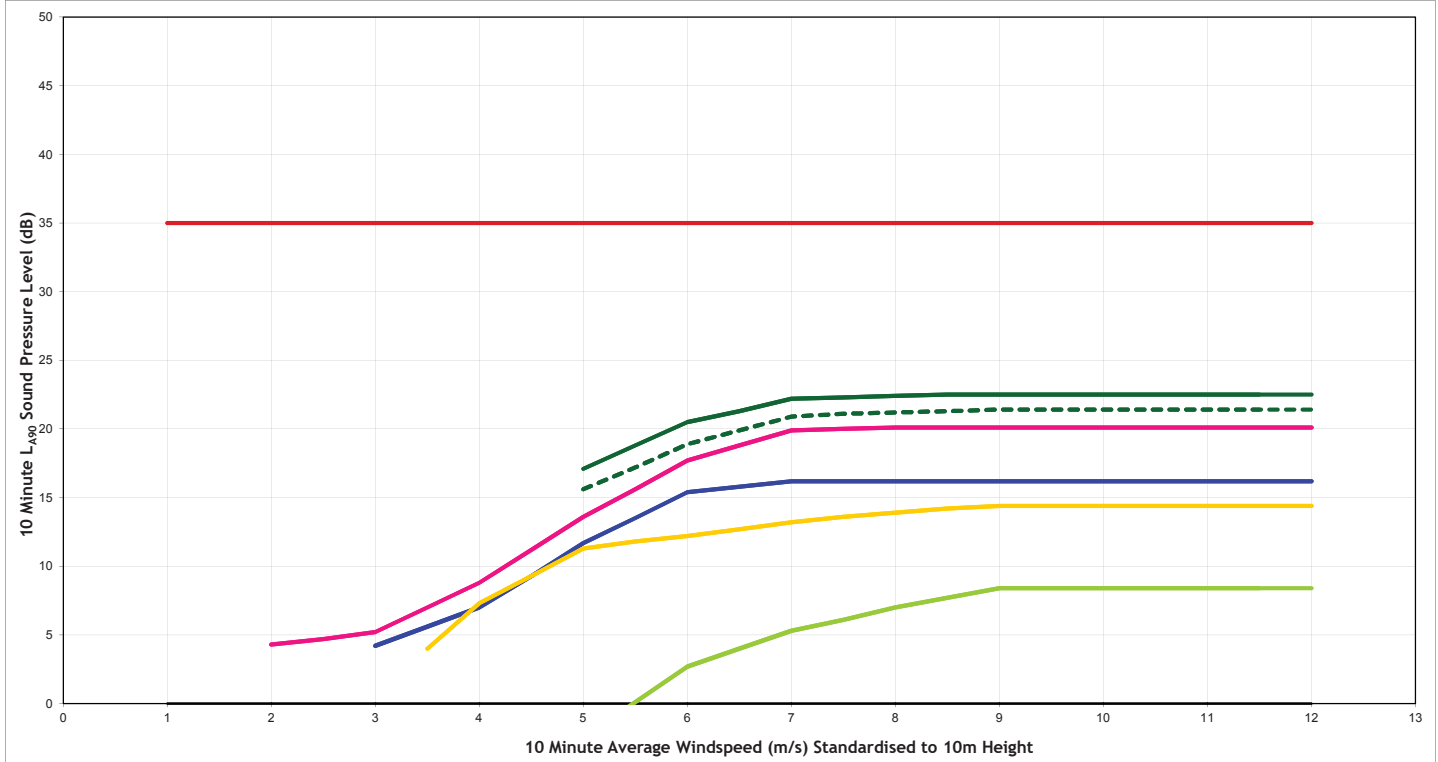
|                    |                               |
|--------------------|-------------------------------|
| Project            | Bhlaraidh Extension Wind Farm |
| Client             | SSE Renewables                |
| Title              | Noise Assessment              |
|                    | Tomich (NAL6)                 |
| Figure Number      | Figure A1 4f                  |
| Scale              | NTS                           |
| Drawn              | MT                            |
| Checked            | GC                            |
| Date               | 09/04/2020                    |
| Document Reference | 13813-Models                  |



### Quiet Daytime - Inchtellach House (NAL7)



### Night Time - Inchtellach House (NAL7)



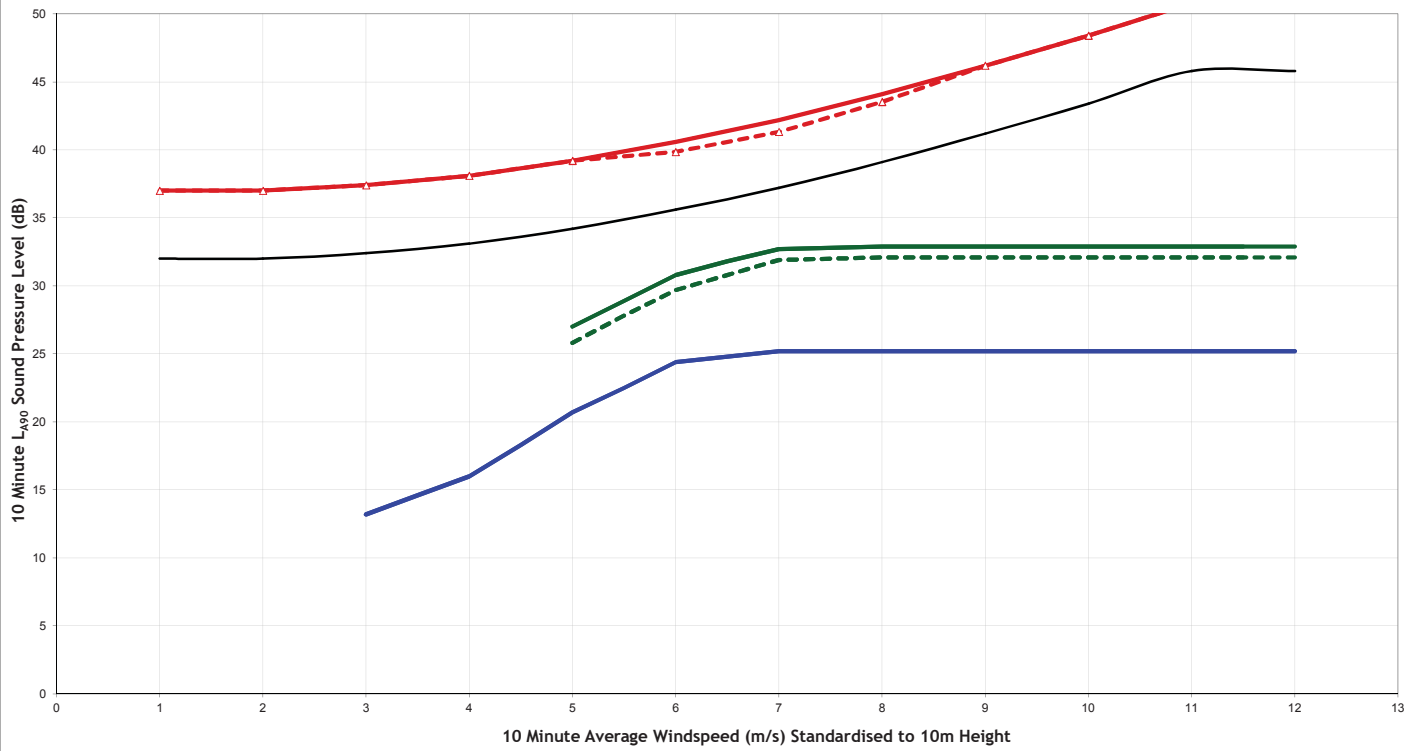
#### Legend:

- Total ETSU-R-97-Limit
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Only
- Bhlaraidh Extension Only
- Corrimony Only
- Fasnakyle Only

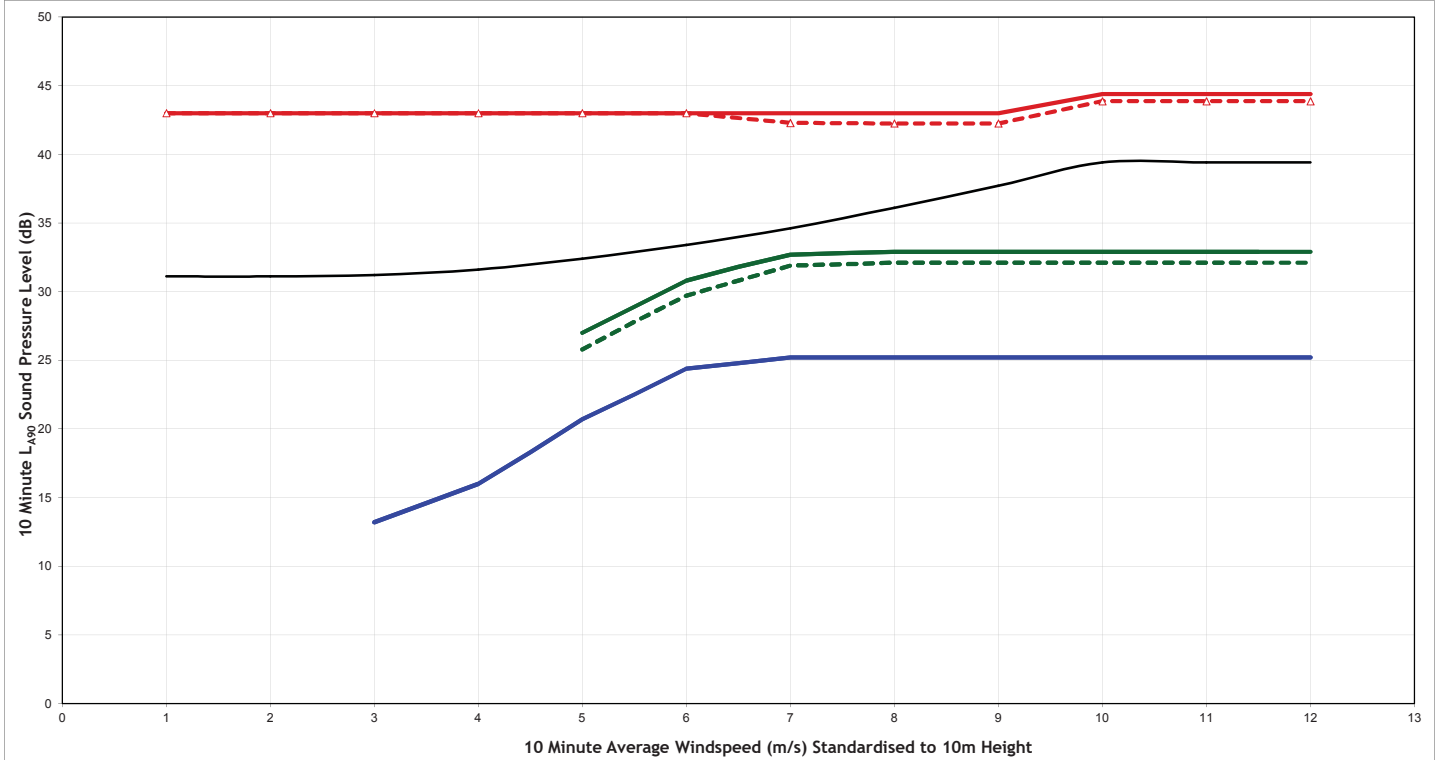
|                    |  |
|--------------------|--|
| Project            | Bhlaraidh Extension Wind Farm                |
| Client             | SSE Renewables                               |
| Title              | Noise Assessment<br>Inchtellach House (NAL7) |
| Figure Number      | Figure A1 4g                                 |
| Scale              | NTS  |
| Drawn              | MT   |
| Checked            | GC   |
| Date               | 09/04/2020                                   |
| Document Reference | 13813-Models                                 |



### Quiet Daytime - Bhlàraidh (NAL1)



### Night Time - Bhlàraidh (NAL1)



#### Legend:

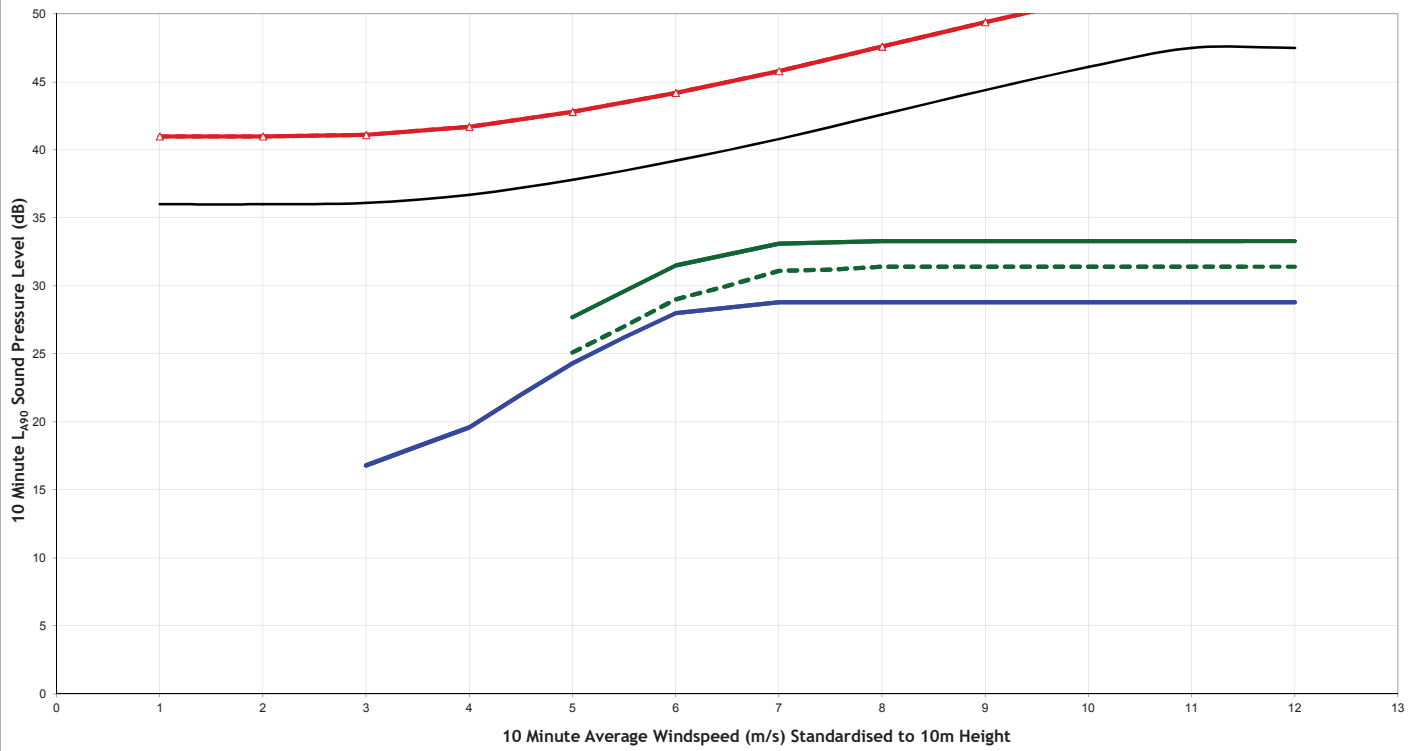
- Total ETSU-R-97-Limit
- - - Δ - - - Site Specific Limits
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlàraidh Extension)
- Bhlàraidh Extension Only

|                    |                                      |
|--------------------|--------------------------------------|
| Project            | Bhlàraidh Extension Wind Farm        |
| Client             | SSE Renewables                       |
| Title              | Noise Assessment<br>Bhlàraidh (NAL1) |
| Figure Number      | Figure A1 5a                         |
| Scale              | NTS                                  |
| Drawn              | MT                                   |
| Checked            | GC                                   |
| Date               | 09/04/2020                           |
| Document Reference | 13813-Models                         |

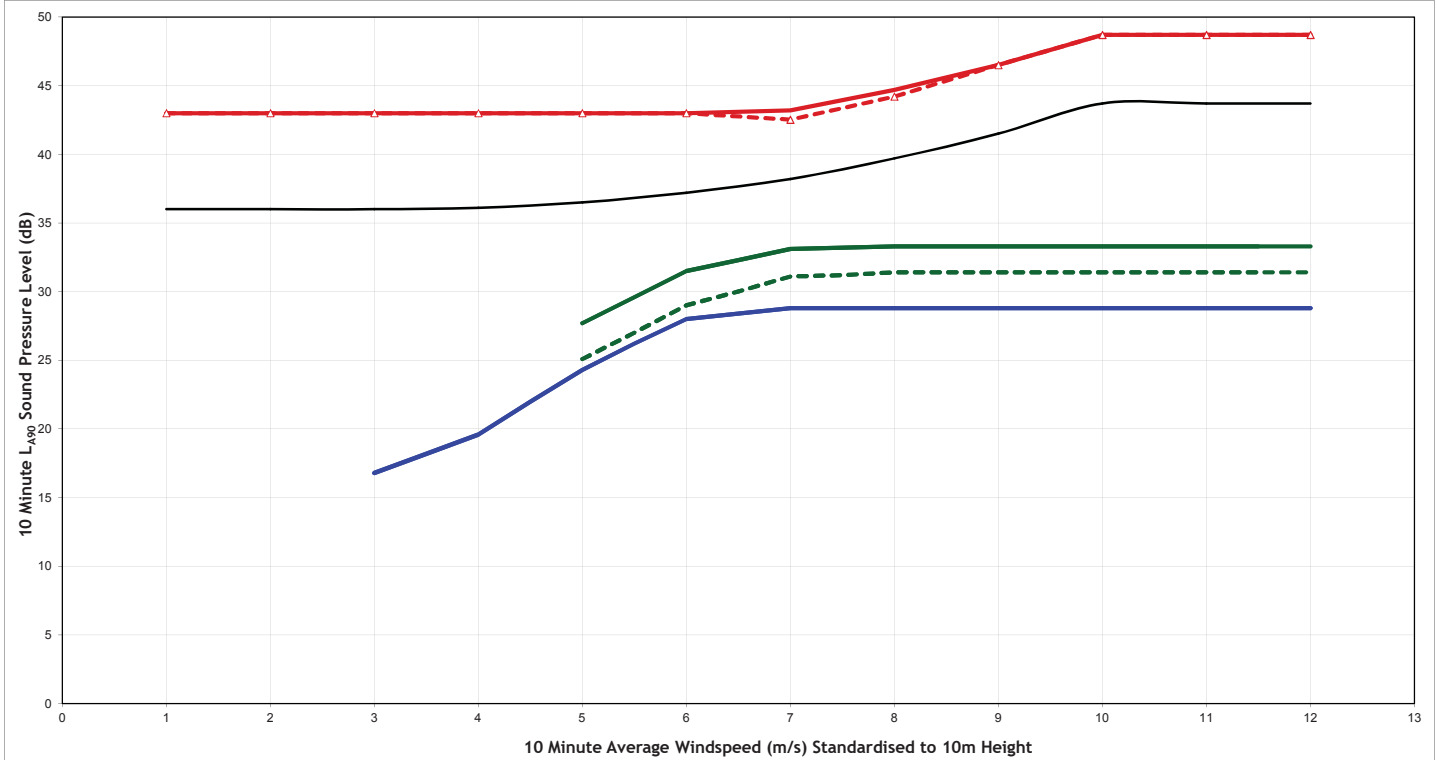




### Quiet Daytime - Levishie Cottage (NAL2)



### Night Time - Levishie Cottage (NAL2)



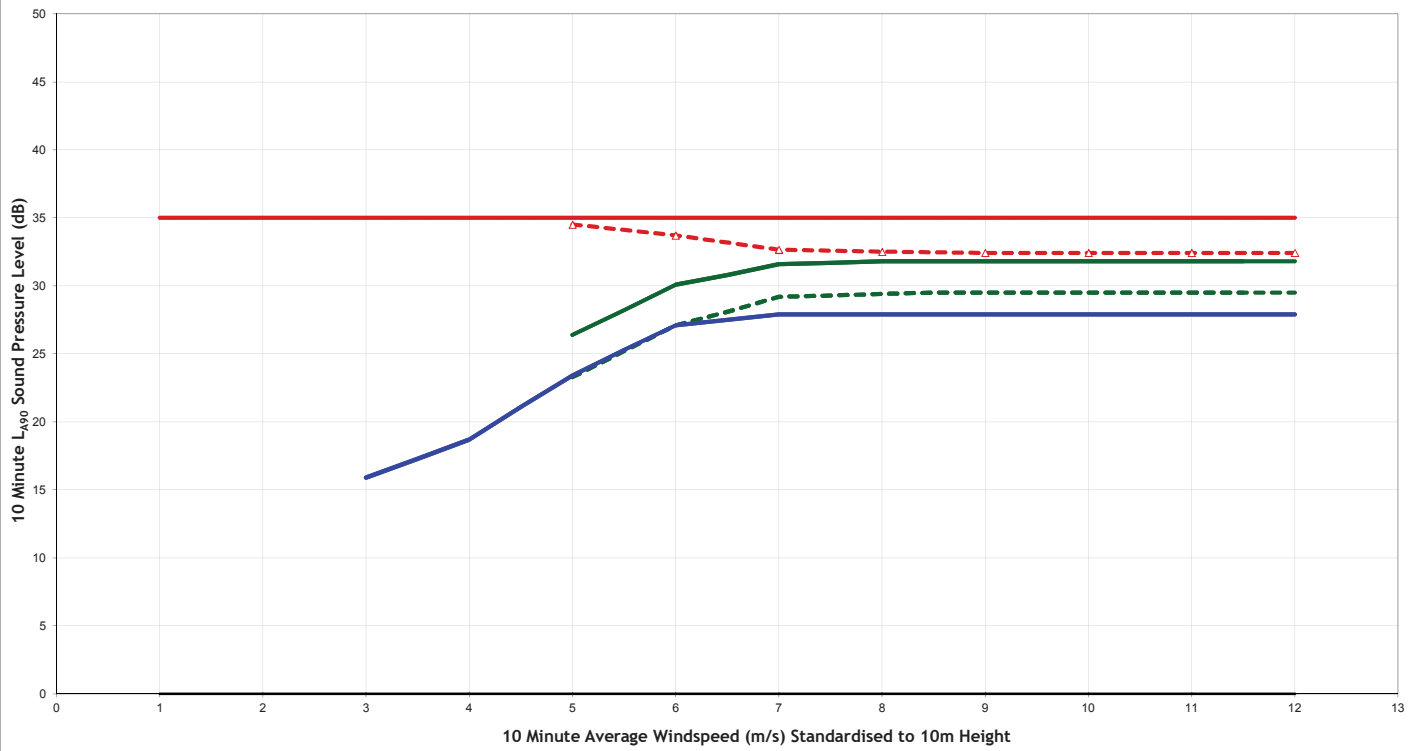
#### Legend:

- Total ETSU-R-97-Limit
- - - - - Site Specific Limits
- Cumulative Wind Farms
- - - - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

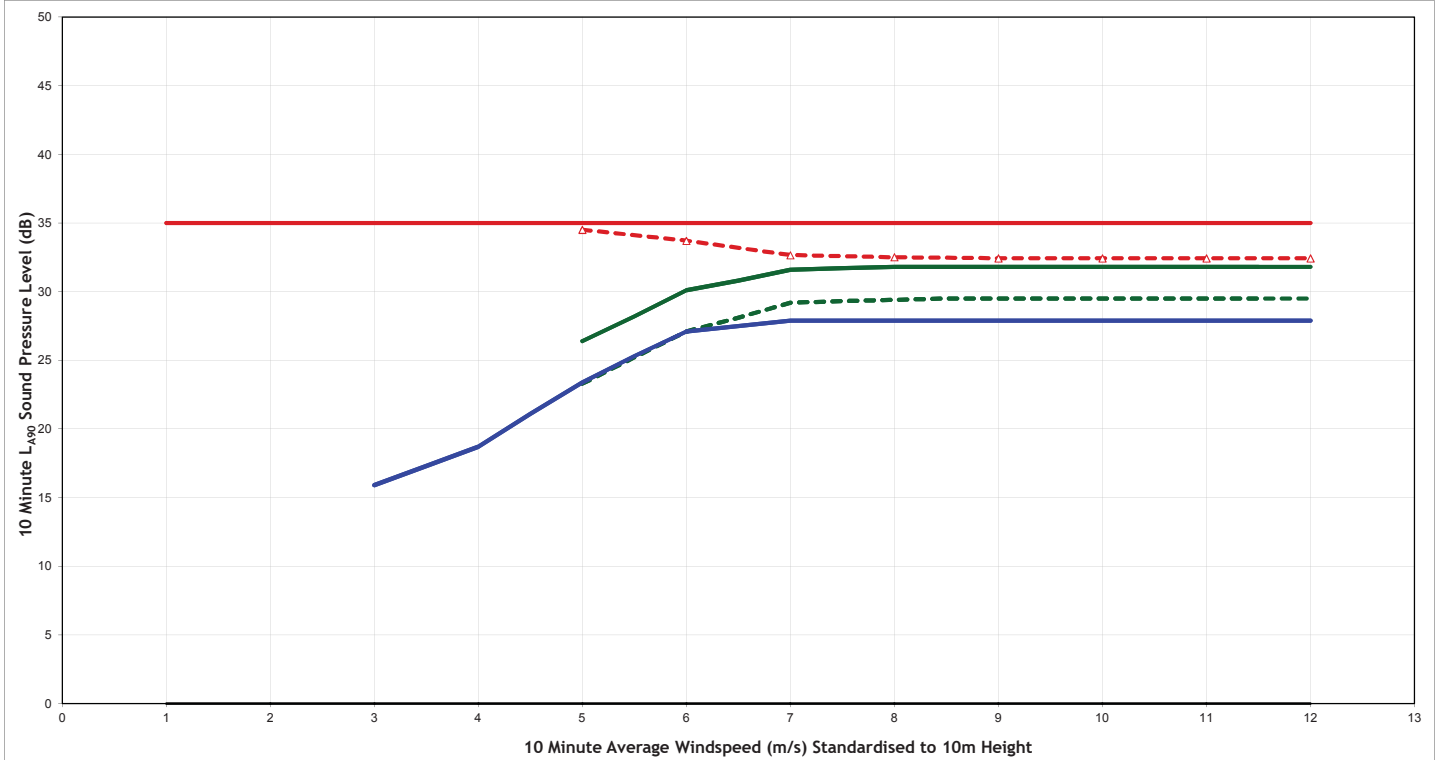
|                    |   |
|--------------------|---|
| Project            | Bhlaraidh Extension Wind Farm               |
| Client             | SSE Renewables                              |
| Title              | Noise Assessment<br>Levishie Cottage (NAL2) |
| Figure Number      | Figure A1 5b                                |
| Scale              | NTS   |
| Drawn              | MT  |
| Checked            | GC  |
| Date               | 09/04/2020                                  |
| Document Reference | 13813-Models                                |



### Quiet Daytime - Achnaconeran (NAL3)



### Night Time - Achnaconeran (NAL3)



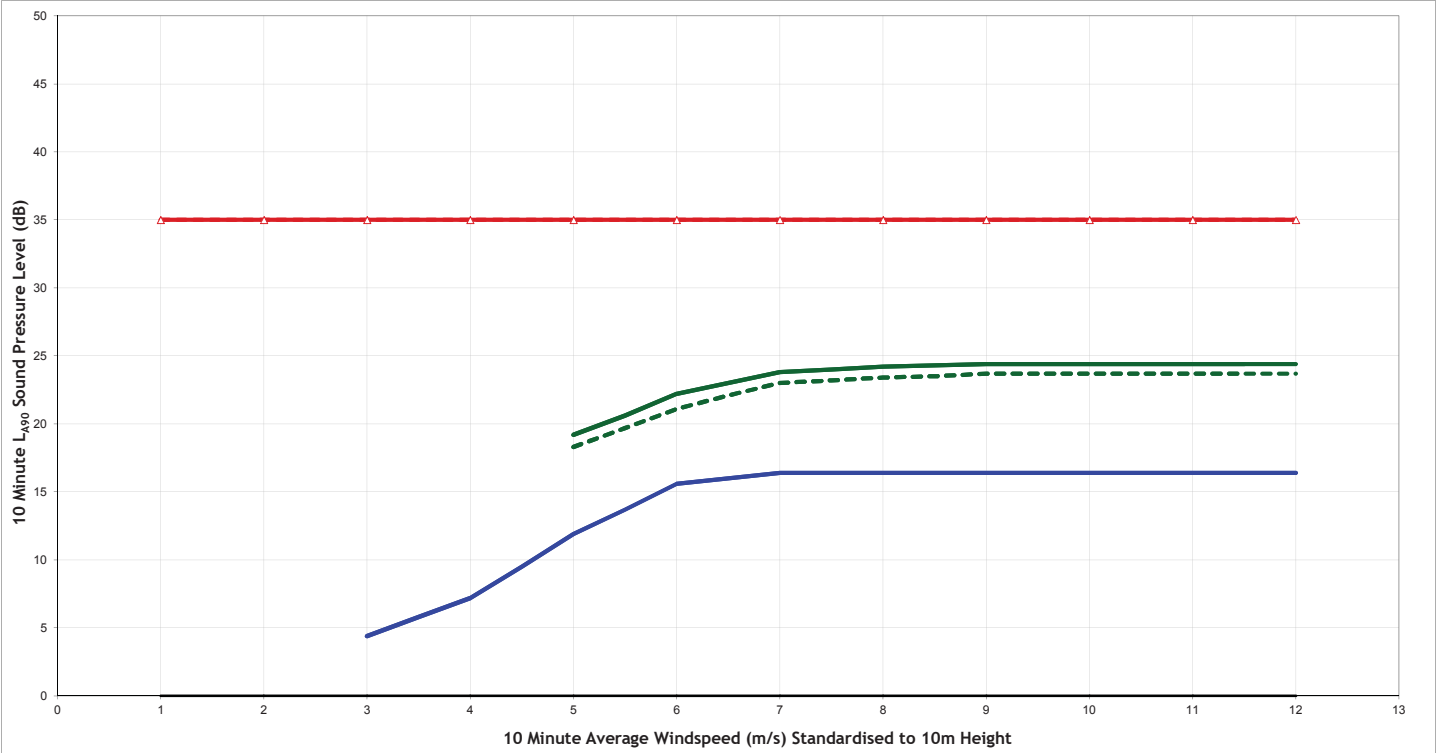
#### Legend:

- Total ETSU-R-97-Limit
- - - Δ - - - Site Specific Limits
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

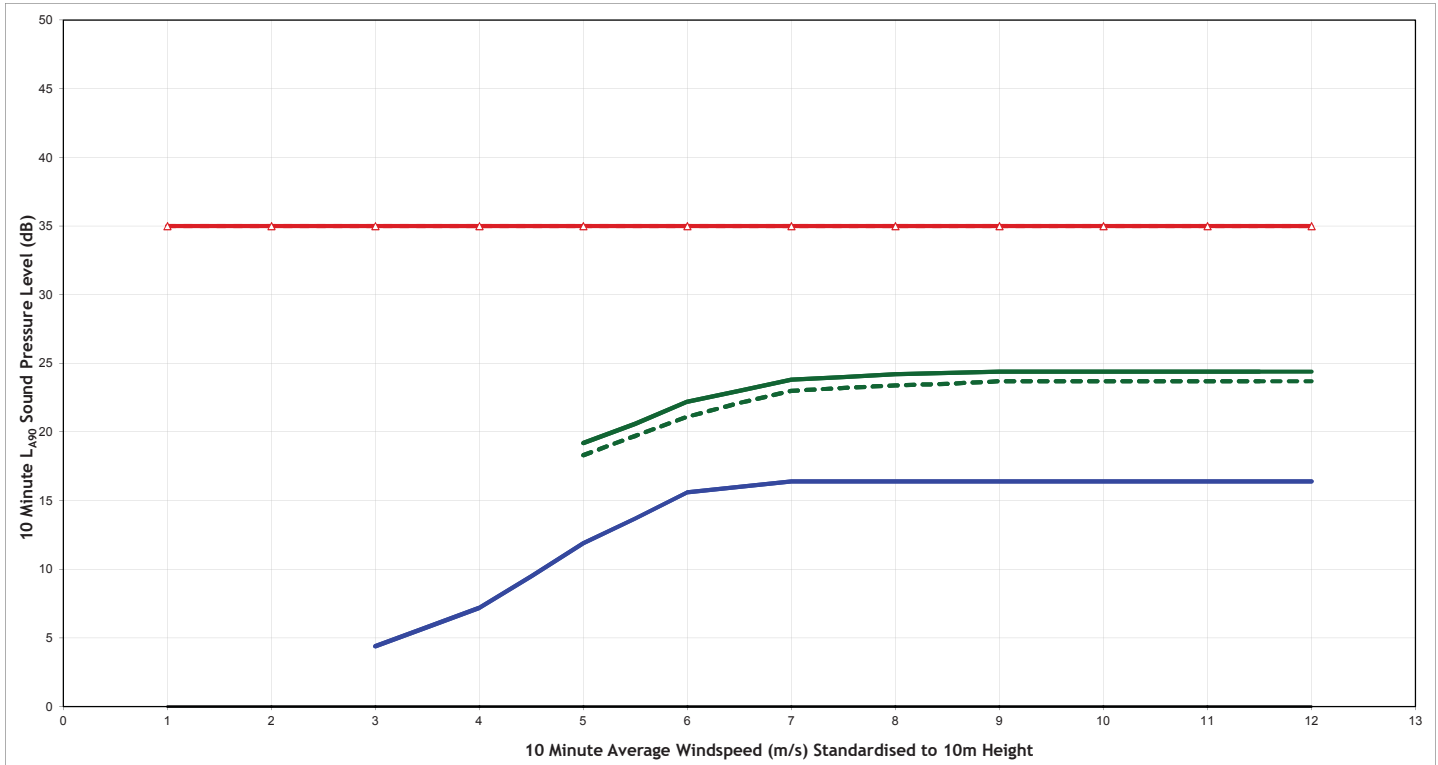
|                    |   |
|--------------------|---|
| Project            | Bhlaraidh Extension Wind Farm           |
| Client             | SSE Renewables                          |
| Title              | Noise Assessment<br>Achnaconeran (NAL3) |
| Figure Number      | Figure A1 5c                            |
| Scale              | NTS                                     |
| Drawn              | MT                                      |
| Checked            | GC                                      |
| Date               | 09/04/2020                              |
| Document Reference | 13813-Models                            |



Quiet Daytime - Shewglie (NAL4)



Night Time - Shewglie (NAL4)



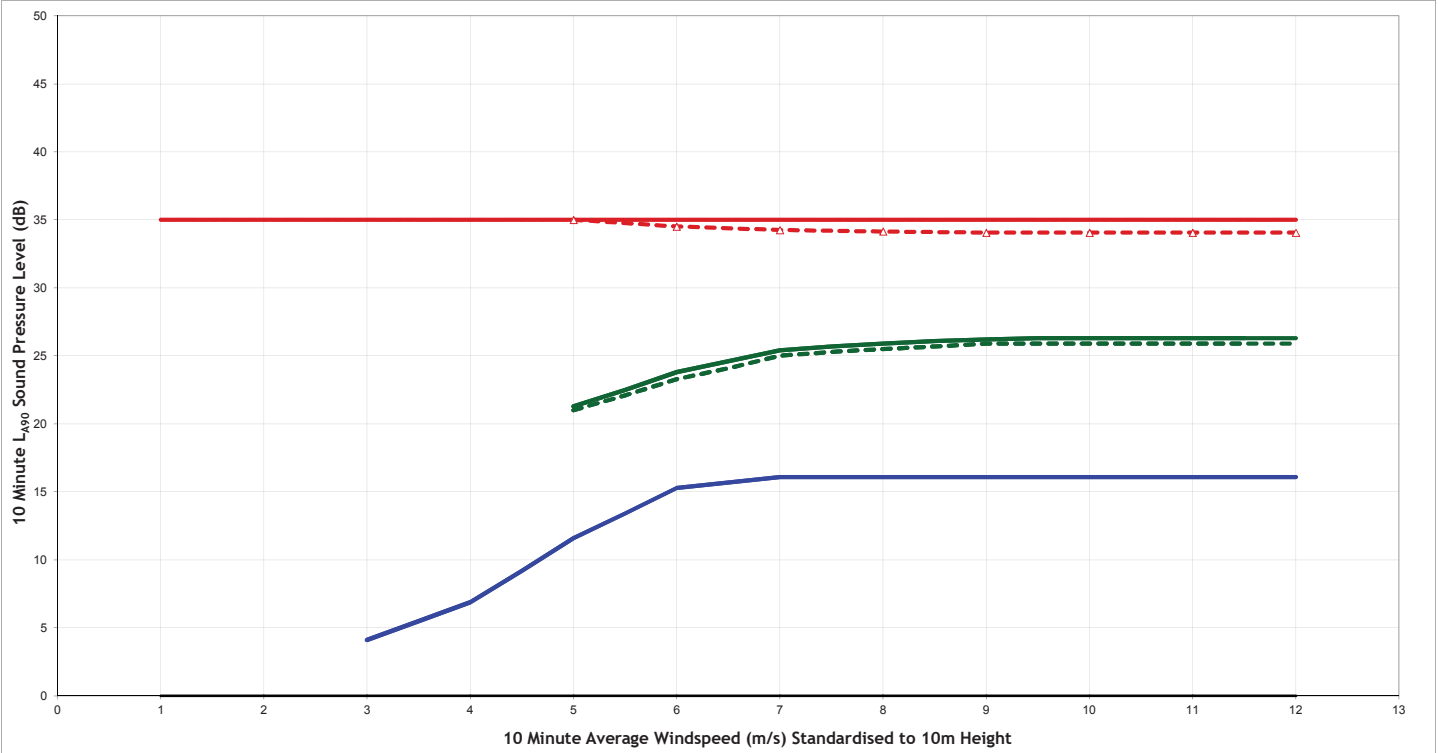
Legend:

- Total ETSU-R-97-Limit
- - -  $\Delta$  - - - Site Specific Limits
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

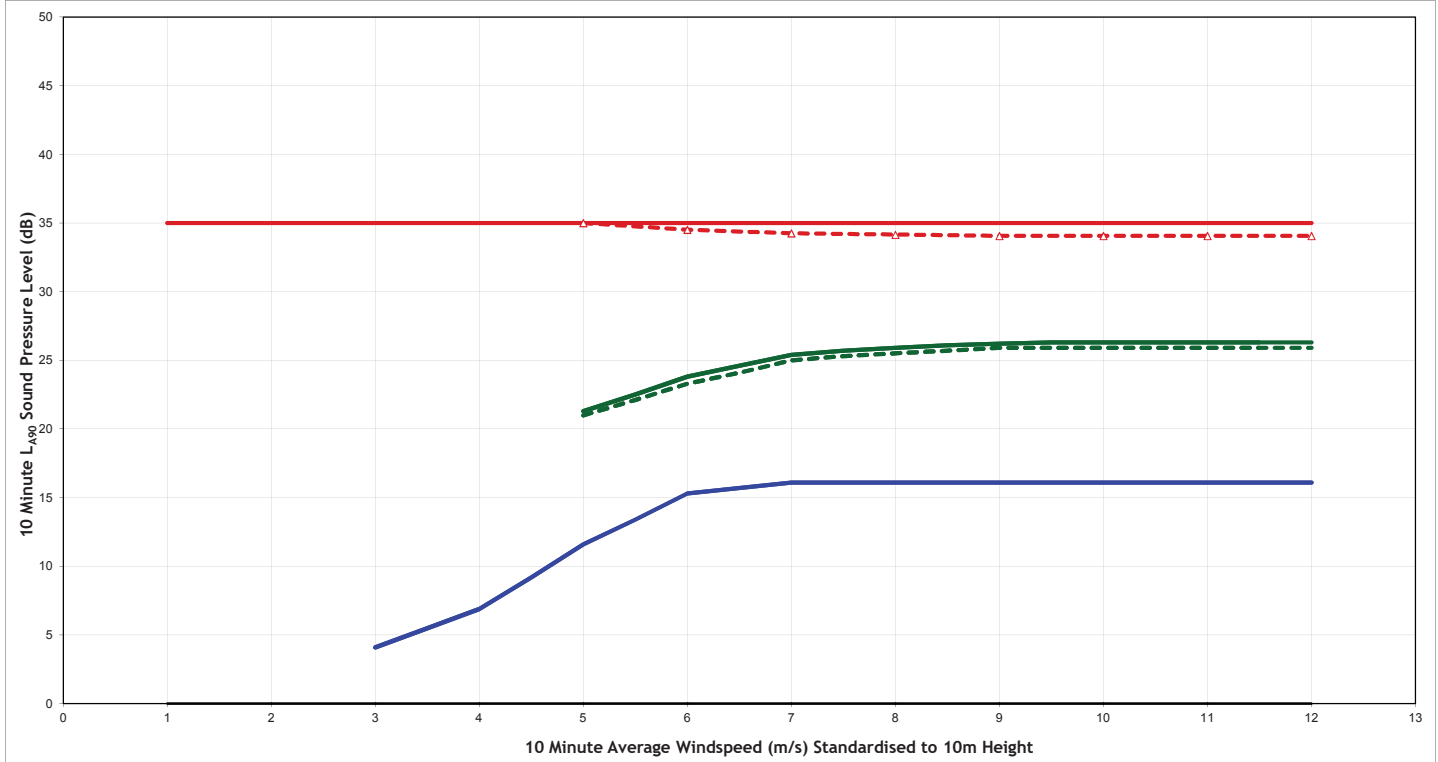
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|--------------------|-------------------------------------|
| Project            | Bhlaraidh Extension Wind Farm       |
| Client             | SSE Renewables                      |
| Title              | Noise Assessment<br>Shewglie (NAL4) |
| Figure Number      | Figure A1 5d                        |
| Scale              | NTS                                 |
| Drawn              | MT                                  |
| Checked            | GC                                  |
| Date               | 09/04/2020                          |
| Document Reference | 13813-Models                        |



Quiet Daytime - Corrimony (NAL5)



Night Time - Corrimony (NAL5)



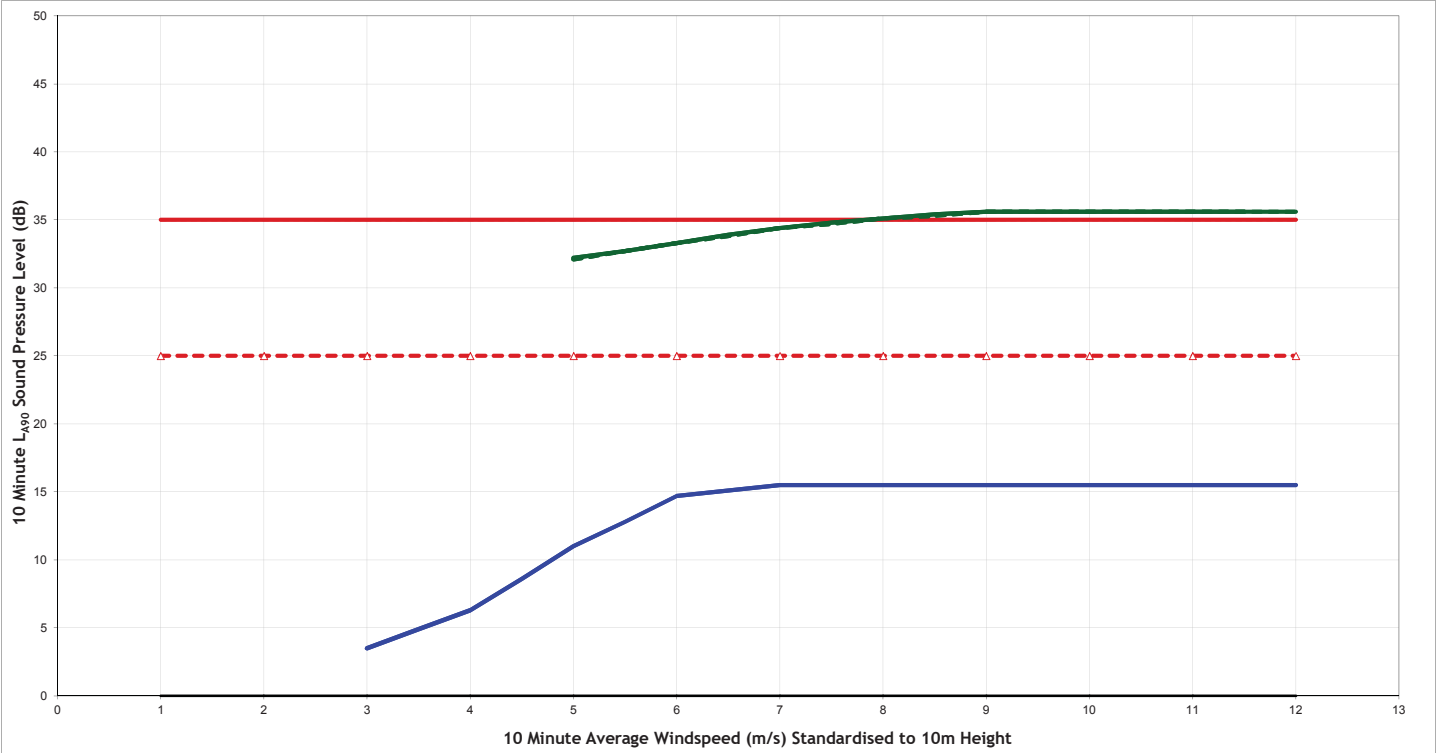
Legend:

- Total ETSU-R-97-Limit
- - - Δ - - - Site Specific Limits
- Cumulative Wind Farms
- - - - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

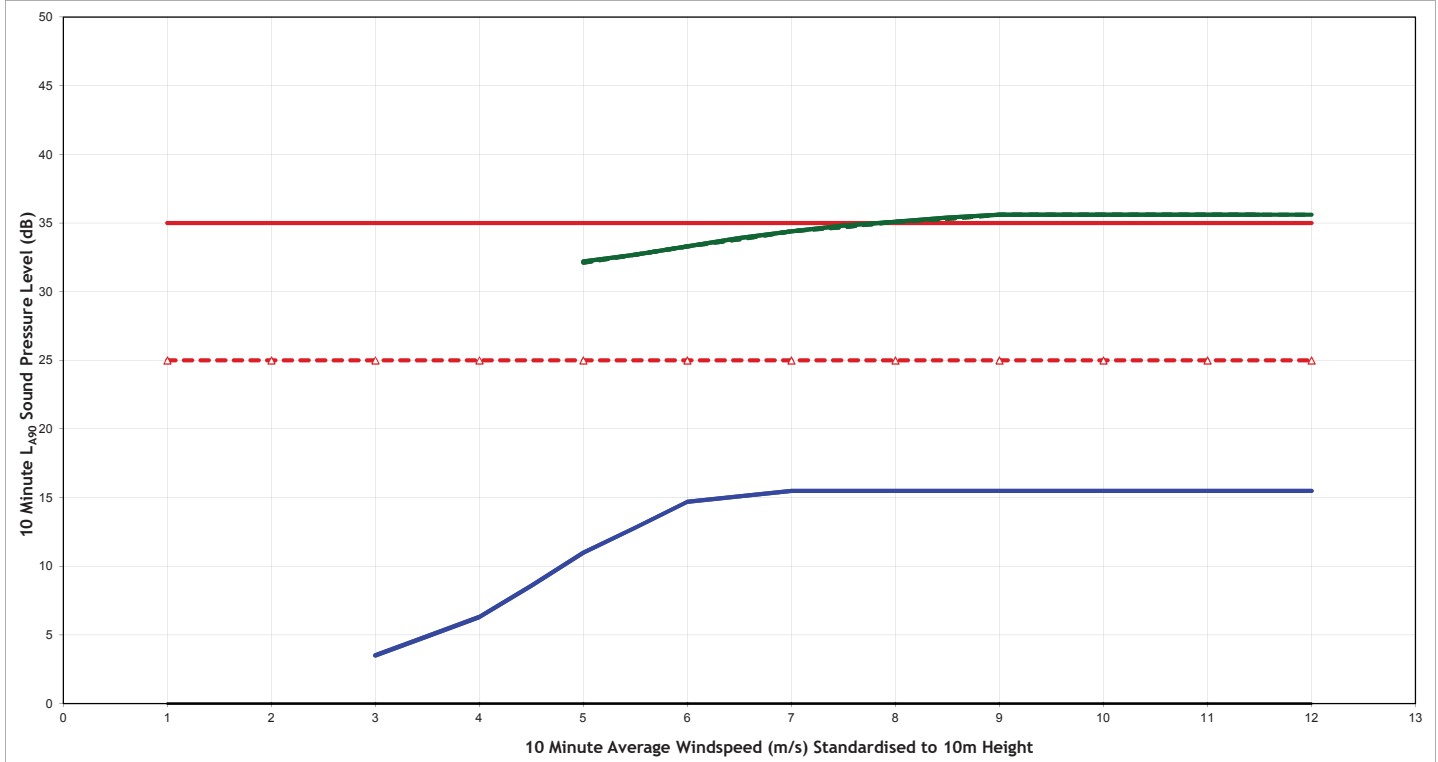
|                    |                                      |
|--------------------|--------------------------------------|
| Project            | Bhlaraidh Extension Wind Farm        |
| Client             | SSE Renewables                       |
| Title              | Noise Assessment<br>Corrimony (NAL5) |
| Figure Number      | Figure A1 5e                         |
| Scale              | NTS                                  |
| Drawn              | MT                                   |
| Checked            | GC                                   |
| Date               | 09/04/2020                           |
| Document Reference | 13813-Models                         |



### Quiet Daytime - Tomich (NAL6)



### Night Time - Tomich (NAL6)



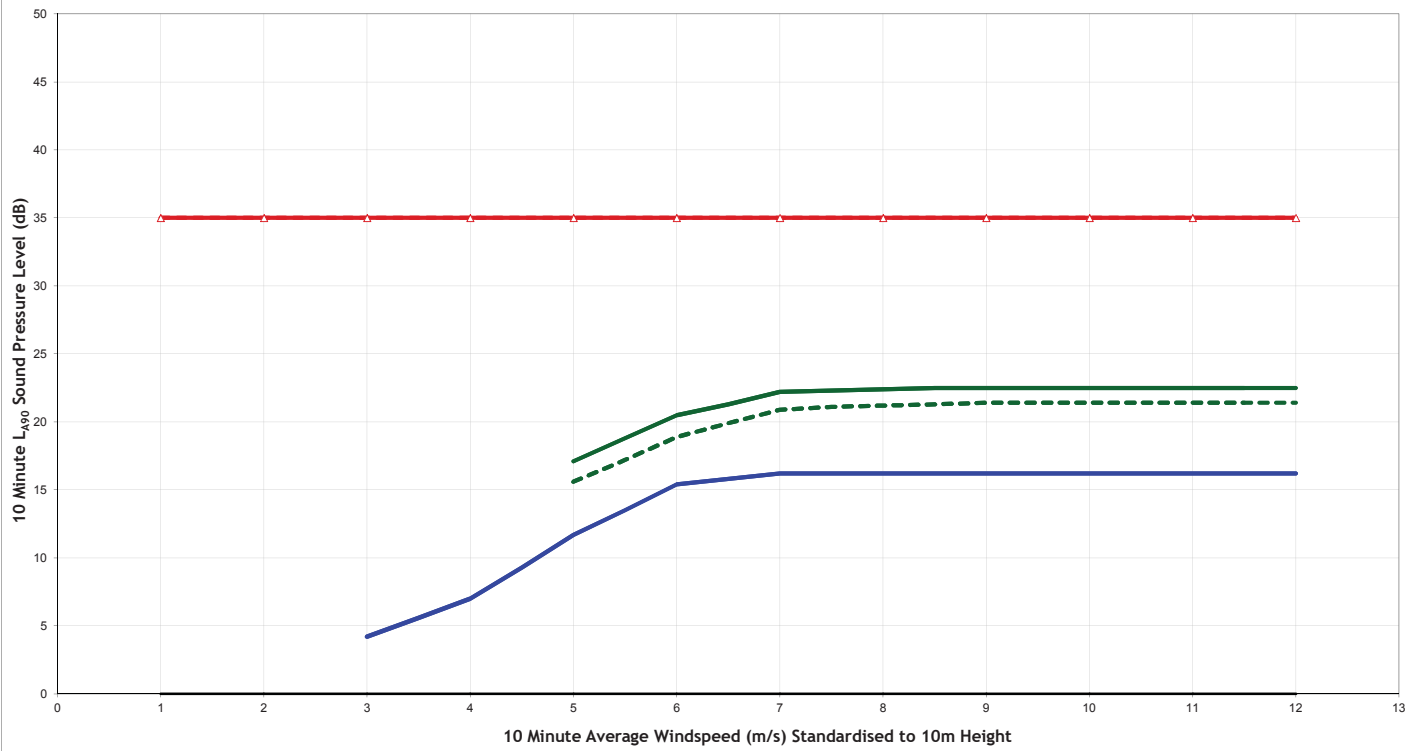
#### Legend:

- Total ETSU-R-97-Limit
- - -  $\Delta$  - - - Site Specific Limits
- Cumulative Wind Farms
- - - - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

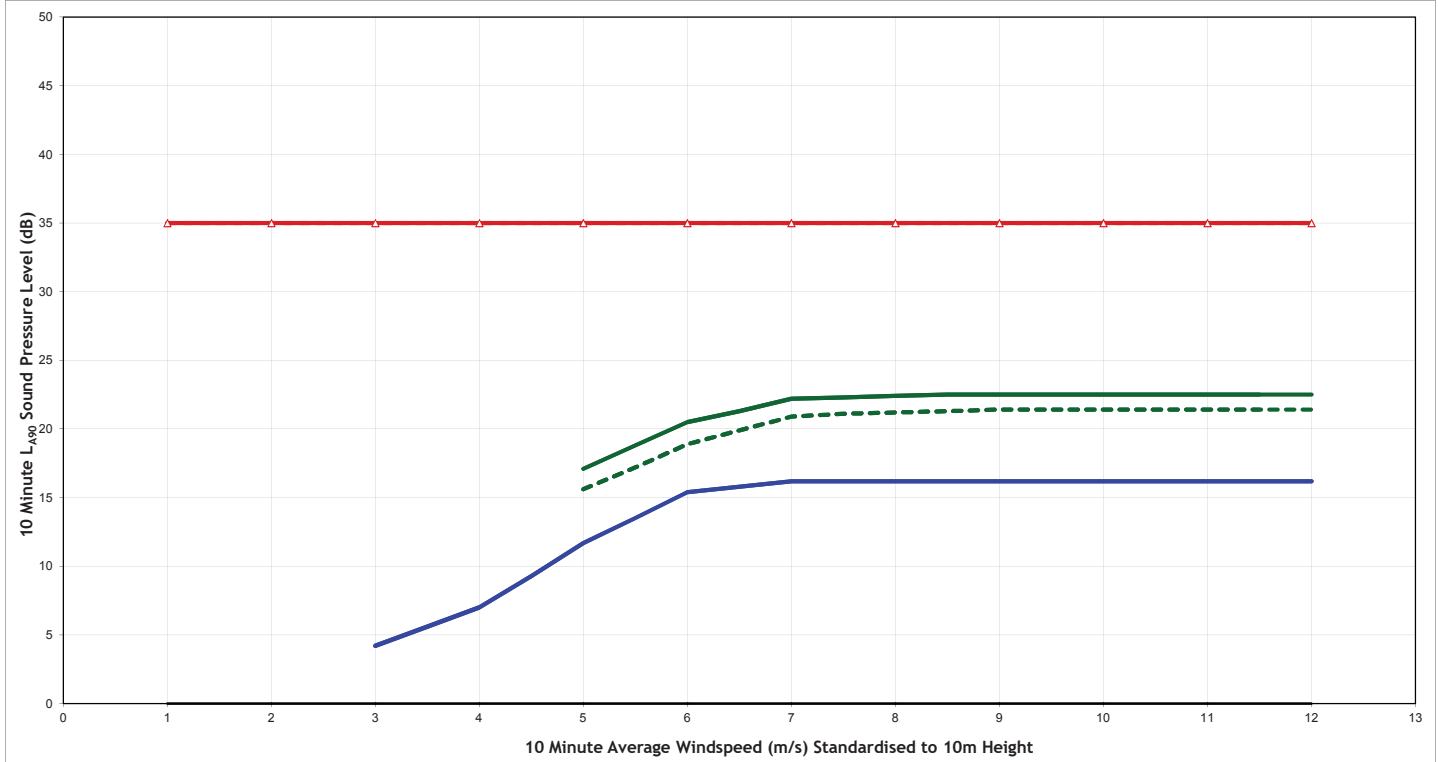
|                    |                               |
|--------------------|-------------------------------|
| Project            | Bhlaraidh Extension Wind Farm |
| Client             | SSE Renewables                |
| Title              | Noise Assessment              |
| Figure Number      | Figure A1 5f                  |
| Scale              | NTS                           |
| Drawn              | MT                            |
| Checked            | GC                            |
| Date               | 09/04/2020                    |
| Document Reference | 13813-Models                  |



### Quiet Daytime - Inchtellach House (NAL7)



### Night Time - Inchtellach House (NAL7)



#### Legend:

- Total ETSU-R-97-Limit
- - - Δ - - - Site Specific Limits
- Cumulative Wind Farms
- - - Cumulative Wind Farms (excluding Bhlaraidh Extension)
- Bhlaraidh Extension Only

**Project** Bhlaraidh Extension Wind Farm  
**Client** SSE Renewables  
**Title** Noise Assessment  
**Figure Number** Figure A1 5g  
**Scale** NTS  
**Drawn** MT  
**Checked** GC  
**Date** 09/04/2020  
**Document Reference** 13813-Models



## THC Historic Environment Team (HET)

**Sarah Tullie**

---

**Subject:** FW: Bhlaraidh Extension

---

**From:** Kirsty Cameron [REDACTED]  
**Sent:** 08 April 2020 16:33  
**To:** Victoria Oleksy [REDACTED]  
**Subject:** RE: Bhlaraidh Extension

Hi Vicky

Many thanks for sending the details for this proposal. I can confirm I would be happy for the direct impacts to Cultural Heritage to be scoped out of the EIA. In addition, I do not believe that the potential for unrecorded historic environment features is such that would justify walkover survey; so this can also be scoped out.

Please let me know if you need anything further at this stage.

Kind regards  
Kirsty

Kirsty Cameron | Archaeologist | Environmental Advice & Consultancy Team  
Highland Council | Development & Infrastructure | Glenurquhart Road, Inverness, IV3 5NX | [REDACTED]  
HER | Historic Environment Record | <https://her.highland.gov.uk>

---

**From:** Victoria Oleksy [REDACTED]  
**Sent:** 08 April 2020 15:08  
**To:** Kirsty Cameron [REDACTED]  
[REDACTED]  
**Subject:** Bhlaraidh Extension

Hi Kirsty,

Thanks for the speaking to me just now.

Please see attached the site boundary for Bhlaraidh Extension as discussed. Scoping Opinion also available here: <https://www.energyconsents.scot/ApplicationDetails.aspx?T=9> If you require further information.

As discussed if you can confirm whether consideration of direct impacts, and a walkover survey, can be scoped out of the EIA that would be very helpful.

Best,

Vicky

**Victoria Oleksy**

**AOC Archaeology Group**

**tel:** [REDACTED]  
**fax:** [REDACTED]  
**mobile:** [REDACTED]

**email:** [REDACTED]



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**Listening \* Open \* Valuing \* Improving \* Supporting \* Partnering \* Delivering**  
**Èisteachd \* Fosgailte \* Luach \* Leasachadh \* Taic \* Com-pàirteachas \* Lìbhrigeadh**

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