

Technical Appendix 1.4: Consultation Register

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Introduction
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Consultation and engagement with stakeholders are an important part of the EIA process, with advice and input from key consultees being sought at the early design stages of a project, to inform decisions about the Proposed Development.
- 1.4.2

An EIA Scoping Report for the Proposed Development was issued to ECU on 17th January 2025 (see **Technical Appendix 1.2**). A Scoping Opinion was provided by ECU on 17th May 2025 (see **Technical Appendix 1.3**). The responses, contained within the Scoping Opinion and all other pre-application-consultation (PAC), have been considered in detail during the EIA process.
- 1.4.3

This Technical Appendix provides details all of all consultation feedback received as part of the PAC process for the Proposed Development, as well as the Applicant's response and details of how the comments have been addressed throughout the EIA process.

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
Pre-Scoping Consultation				
Environmental Health Department at the Highland Council (THC)	June 19	Noise	Requested kits be installed in accordance with the IOA GPG. With regards to the identified derelict properties, need to confirm with planning that they can be discounted as being derelict. TNEI proposed baseline noise monitoring at six Noise Monitoring Locations (NMLs) . The NMLs to be used for an unattended ETSU-R-97 baseline survey for the operational wind farm noise assessment.	Noise kits were sited in accordance with the IOA GPG. Further information on the baseline noise survey design can be found in Annex 2 of Technical Appendix 8.2 . The Applicant contacted the planning department but no formal confirmation has been received regarding the status of derelict properties. Property was classed as uninhabitable, rather than derelict as it has a roof, this has been considered in Chapter 8: Noise and Vibration and Chapter 13: Shadow Flicker . The choice of monitoring locations was agreed by an Environmental Health Officer (EHO) at THC on the 6th September 2019
Scoping Opinion				
Statutory Comments				
Consultee	Date	Topic	Comment	Response
Energy Consents Unit (ECU)	08/05/25	Aviation	The Company should engage with the CAA to discuss and agree their hours of darkness aviation lighting requirements.	An Aviation Lighting Assessment has been included as Technical Appendix 12.1 , which has been shared with CAA. See Technical Appendix 12.1 for details of the approach to the lighting design. It is to be noted, that the CAA did not submit a response to the Scoping Report.
		Aviation	With regards to impacts of hours of darkness aviation lighting, the Company should discuss and agree with the Highland Council and NatureScot the range (in kilometres from the proposed Development) for hours of darkness assessments of the impacts of aviation lighting and receptors therein to be assessed. As well as the scope, methodology, findings and recommendations of such assessments, full details of all mitigation of aviation lighting impacts subsequently identified should be provided in the EIA report.	Technical Appendix 4.8 comprises the Aviation Lighting Impact Assessment (which has been undertaken in accordance with NatureScot guidance).
		Aviation	The Company should have discussions with the DIO to resolve their concerns and agree appropriately worded conditions in respect of the proposed Development introducing a physical obstruction to low flying area 14 (LFA 14).	Noted. The Applicant has consulted the DIO to address LFA14 safeguarding and agree appropriate planning conditions/mitigation. Engagement outcomes are summarised in Chapter 12: Aviation .
		Aviation	The Company should have discussions with Highlands & Islands Airports Limited with regards to an Aviation Impact Feasibility Study on possible impacts on the infrastructure and operation of Wick Airport.	Noted. The Applicant engaged with HIAL and undertook an Aviation Impact Feasibility Study/Instrument Flight Procedure assessment for Wick Airport. Findings and any mitigation are reported in Chapter 12: Aviation , and Technical Appendix 12.3 .
		Battery Storage	With regards to battery storage being included in the Proposed Development, full details of what it will entail (scale, dimensions etc.), its location in the site, minimum and maximum export capacity of megawatts and megawatt hours of electricity and a full assessment of its impacts and effects and all proposed mitigation should be included in the EIA report. Assessment of fire risk and assessment of operational noise associated with the proposed battery storage should also be completed and included in the EIA report.	Full details of the BESS are set out in Chapter 2: Development Description (incl. Figure 2.8 Typical BESS Compound Layout). Operational noise from BESS is assessed in Chapter 8: Noise (with supporting Technical Appendix 8.3). Relevant BESS storage/handling controls are included in Technical Appendix 2.1 .
		Biodiversity	The Company should take note of the requirements of Policy 3(b) of National Planning Framework 4 whereby biodiversity enhancements are to be provided in addition to any proposed mitigation. Information on predicted losses and proposed offsetting and delivery of positive effects on biodiversity should be clearly set out in the EIA report.	Predicted losses and proposed compensation and enhancement measures have been provided in Chapter 6: Ecology . Information regarding the habitats, including their total areas (ha), recorded within the ESA are provided in Technical Appendix 6.2 . An Outline Restoration Enhancement Plan has been provided in Technical Appendix 6.6 , which sets out proposed measures to ensure enhancement measures satisfy NPF 4 Policy 3b requirements.
		Ornithology	Decisions on bird surveys – species, methodology, vantage points, viewsheds and duration – site specific and cumulative should be made following discussion between the Company, NatureScot and RSPB Scotland.	The Applicant has agreed species, methods, vantage points, viewsheds, and survey durations (including cumulative scope) with NatureScot and RSPB Scotland. Survey design and results are presented in Chapter 7: Ornithology with supporting Technical Appendix 7.1 .

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Consultee	Date	Topic	Comment	Response
		Borrow pits	Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size, layout and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should also be appraised as part of the overall impact. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	A borrow pit appraisal has been undertaken to support the application, which includes their location, size and layout, and nature. This is described in Chapter 2: Development Description, their location is shown in Figure 2.1. Potential effects on noise, hydrology and nuisance have also been assessed and considered. These are included in Chapter 2: Development Description, Chapter 8: Noise and Vibration, Chapter 10: Hydrology, Chapter 11: Geology and Soils and Technical Appendix: 2.1 and Chapter 14: Schedule of Mitigation and Residual Effects.
		BT radio link	The Company should discuss with BT resolving any interference caused to BT Radio link 12803 by turbines 15, 16 and 17.	The Applicant has removed turbine T15 and T17, and repositioned turbine T16, which helped to mitigate potential impacts to BT Radio Link 12803.
		Cumulative impact assessments	To ensure that cumulative impact assessments are as up-to-date as possible, other Developments to be included should be discussed and agreed by the Company and the Highland Council. Assessments, photography and visualisations submitted in the EIA report should reflect the most up-to-date cumulative position.	The Applicant sought to agree the cumulative schemes list with THC prior to assessment, THC are yet to respond. The EIA includes up-to-date cumulative assessments, photography and visualisations in Chapter 4: Landscape and Visual Impact Assessment and Technical Appendix 4.9 , with topic-specific cumulative assessments.
		Description of Development	In the description of the Proposed Development to be included in the EIA report, all the specific elements of the Proposed Development for which consent under section 36 of the Electricity Act 1989 is applied for must be made clear. If applicable, that includes battery storage.	Chapter 2: Development Description clearly identifies all components for which section 36 consent is sought.
		Designated areas, protected areas, protected species and historic environment assets	The Company should seek the agreement of the Highland Council, Historic Environment Scotland and NatureScot regarding the designated sites, protected areas, protected species and historic environment assets to be included in the EIA report. Where required, sufficient information should be included in the EIA report regarding Habitat Regulation Appraisals.	The Applicant agreed the scope of designated/protected features with THC, HES and NatureScot. Assessments are provided in Chapter 6: Ecology , Chapter 5: Cultural Heritage (with Technical Appendices 5.1–5.3) and Chapter 4: Landscape and Visual Impact Assessment (with Technical Appendix 4.6), with HRA information contained in Technical Appendix 6.4 . Mitigation is summarised in Chapter 14: Schedule of Mitigation and Residual Effects .
		Ecology and ornithology and designated and protected areas	The EIA report should provide a baseline survey of the animals (mammals, reptiles, amphibians, etc) and bird interests on site. Before an application is submitted it needs to be categorically established which species are present on the site, and where they are present. Further, the EIA report should provide an account of the habitats present on the site of the proposed Development. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans.	Baseline surveys for protected species and habitats are summarised in Chapter 6: Ecology . Detailed information, including methodology and results relating to protected species (non-avian) surveys and habitat surveys can be found in Technical Appendix 6.2 and 6.3 . Detailed information, including methodology and results relating to protected avian species is contained in Chapter 7: Ornithology and its associated appendices
		Fish	Fisheries Management Scotland have developed advice which should be fully considered throughout the planning, construction and monitoring phases of the proposed Development. That advice can be found at: 170412-Guidance-Terrestrial-windfarms.pdf (fms.scot) MD-SEDD generic scoping guidelines for onshore wind farm (and overhead line development) is provided at: Onshore Renewables Interactions - gov.scot (www.gov.scot) How fish populations can be impacted during the construction, operation and decommissioning of a wind farm development should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.	The Marine Directorate – Science Evidence Data and Digital (MD-SEDD) – EIA Checklist is available in Technical Appendix 6.7
		Hazardous Substances	The company should assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.	Handling/storage controls are outlined in Technical Appendix 2.1 .
		Flow Country World Heritage Site	A full assessment of impacts the proposed Development may have on the Flow Country World Heritage Site should be included in the EIA report.	A full and detailed assessment of potential impacts, including cumulative impacts, on the Flow Country WHS is provided in Chapter 6: Ecology and specifically in Technical Appendix 6.5 of the EIA Report.
		Hydrology, geology, hydrogeology and peat	Full assessments on the impacts on peatland, carbon-rich soils and priority peatland habitat: should be included in the EIA report and must include peat probing for all areas where development is proposed. The assessment should include probing not just at the locations of infrastructure but also covering the areas of ground which would be subject to micro siting limits. The assessments should include full details of how any identified impacts will be overcome by siting, design or mitigation. A Peat Management Plan should also be prepared, as well as an Outline Habitat Management Plan.	Peat probing has been undertaken across all proposed infrastructure within the Developable Area and within micrositing buffers. An assessment of impacts on peat and carbon-rich soils is included in Chapter 11: Geology and Soils , supported by Technical Appendices 11.1, 11.2, 11.3, 10.2 and 10.1 . Wider habitat restoration commitments are included in Technical Appendix 6.6 , with all mitigation consolidated in Chapter 14: Schedule of Mitigation and Residual Effects .
		Landscape and Visual	The study area in kilometres of the Proposed Development should be agreed following discussion between the Company, NatureScot and the Highland Council.	The LVIA study area has been determined based upon current guidance published by NatureScot and following receipt of scoping response. Details are set out in Chapter 4: Landscape and Visual Impact Assessment
		MD-SEDD standing advice	Please ensure that the checklist contained in the MD-SEDD standing advice is adhered to with regards to the appropriate chapters of the EIA report and is submitted as a part of the application documentation.	The MD-SEDD checklist has been completed and submitted as Technical Appendix 6.7 .

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		Noise	The final list of receptors in respect of noise assessment should be agreed following discussion between the Company and the Highland Council. The noise assessment report should be formatted as per Table 6.1 of the IOA “A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise”.	The operational wind farm noise assessment has been undertaken in accordance with ETSU-R-97 and follows guidance in the IOA GPG. Technical Appendix 8.2 contains all of the information requested in Table 6.1 of the IOA GPG.
		Overhead transmission lines	In relation to the siting of wind turbines, it is recommended that the Company initiates and then continues discussions with SSEN Transmission regarding avoiding conflict with existing overhead transmission lines and proposed overhead transmission lines.	The Applicant engaged with SSEN Transmission to avoid conflicts with existing/proposed OHLs. Constraints and stand-offs are embedded in design (see Chapter 3: Design Evolution and Alternatives , and Chapter 2: Development Description).
		Peat	Where there is a demonstrable requirement for peat landslide hazard and risk assessment (“PLHRA”), the assessment should be undertaken as part of the EIA process. This will provide the Scottish Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. It should be noted by the Company that the Scottish Ministers engage the services of appropriate specialists to assess PLHRAs submitted with an EIA report.	A PLHRA has been prepared in line with the relevant Scottish Government guidelines and provided as Technical Appendix 11.3 , including mapping and mitigation proposals. Related measures are carried through into Technical Appendix 11.2 .
		Private water supplies	The Company should investigate the presence of any private water supplies which may be impacted by the proposed Development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	A PWS desk study was undertaken to identify and assess any supplies potentially affected. Findings and risk assessment are included in Chapter 10: Hydrology .
		Scoping of EIA	The Company should note the advice provided by the Highland Council, NatureScot, RSPB Scotland and Transport Scotland in respect of matters to be scoped out and matters that should not be scoped out.	The Application reflects consultee advice (THC, NatureScot, RSPB Scotland, Transport Scotland) on scoping decisions.
		Transport	The Company should discuss and agree the scope of the Abnormal Loads Assessment with Transport Scotland prior to it being undertaken.	The scope/ methodology for the Abnormal Loads Assessment have been agreed with Transport Scotland prior to completion. Findings are presented in Chapter 9 Traffic and Transport .
		Transport	The Company should discuss and agree the scope of the construction traffic management plan with the Highland Council and Transport Scotland. Local communities which will be impacted by the proposed Development’s construction traffic should also be involved in such discussions. With regards to the assessment of traffic and transport, it should be noted by the Company that the Environmental Assessment of Traffic and Movement (July 2023) guidelines have replaced the Environmental Assessment of Road Traffic (IEMA)(1993) guidelines.	The scope of the CTMP will be agreed with THC and Transport Scotland, with input from affected local communities. An Outline CTMP is provided in Technical Appendix 9.1 with assessment in Chapter 9: Traffic and Transport using the Environmental Assessment of Traffic and Movement (July 2023) guidance. Commitments are captured in Chapter 14: Schedule of Mitigation and Residual Effects .
		Landscape and Visual	Separate volumes of visualisations should be prepared to both Highland Council standards and NatureScot guidance. The final list of viewpoints and visualisations should be agreed following discussion between the Company, the Highland Council and NatureScot.	Viewpoint locations for the LVIA were agreed with THC post-scoping. NatureScot made no comment regarding viewpoint locations for the LVIA as part of their scoping response and thus it is considered that they were content with the proposed locations. Visualisations from each Viewpoint have been prepared to NatureScot guidance (see Technical Appendix 4.2 and Volume 3a Figures, including Figures 4.8a–y). A separate set of viewpoint visualisations have been prepared to accord with THC guidance. These do not form part of the EIA Report.
		Mitigation	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter in the EIA report. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Each EIA chapter concludes with mitigation, and a consolidated Schedule of Mitigation is provided in Chapter 14: Schedule of Mitigation and Residual Effects , where relied upon for significance conclusions.
		EIA summary	When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	This consultation register indicates where each scoping point is addressed across the EIAR.
The Highland Council (THC)	22/04/2025	General	It would be highly beneficial to have information to explain electricity network benefits and capacity proposed, with the end result ideally being all wind turbines being operational on a consistent basis when there is sufficient windspeeds, rather than either certain or no turbines being in operational depending upon short term grid constraints or levels of demand.	The Applicant has a firm offer for grid capacity and managing supply and demand and thus curtailment is the responsibility of the grid operator and sits outside the control of the Applicant.
		LVIA	It is the Council’s position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an ‘equivalent.’ The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape; i.e., a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council’s Visualisation Standards and are subject to an independent verification check upon receipt.	Visualisations that accord with THC guidance have been produced separately and submitted to THC, but do not form part of the EIA.
			These should be provided in hard copy. It would be beneficial for THC’s volume to be provided in an A3 lever arch folder for ease of use. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in the view.	The photomontages show all elements that are visible from each viewpoint. In each case only the proposed turbines and proposed met mast would be visible.

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Consultee	Date	Topic	Comment	Response
			All elements of a development are important to consider within any EIAR and the assessment must include the expected landscape and visual impact of on-site BESS, borrow pits, access roads, compounds including substations and battery storage, this is despite the fact that the principal structures will be a primary concern. All elements of the proposal are to be rendered into photomontages.	
			There are a number of wind farm applications in this area that are yet to be determined / concluded in the vicinity of this application, many of these have been identified in the scoping report, which may or may not help clarify the weight towards particular policy elements in the final planning balance. Our interactive Wind Turbine map is up to date as of 01 January 2024. The ECU may also be able to provide details of any other known nearby proposal that may be at Scoping Stage as these may have advanced at the same pace as your proposal. A final list and cut-off date for cumulative schemes should be agreed in advance with the Highland Council.	Details of cumulative schemes were forwarded to THC in July 2025. No response had been received at the time of writing, and the cumulative assessment is based on the list of schemes forwarded in July 2025. The LVIA cumulative assessment is reported in Chapter 4: Landscape and Visual Impact Assessment and Technical Appendix 4.9 .
			We acknowledge that there will be some micrositing of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. We have also found that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography.	Photography was shot on the basis set out in Chapter 4: Landscape and Visual Impact Assessment and Technical Appendix 4.2 . The majority of photography was used as part of the Golticlay EIA Report, and re-use of this was agreed with consultees.
			As far as possible, the viewpoints should correspond with the viewpoints used for existing wind energy schemes within the area. The detailed location of viewpoints will be informed by site survey, mapping and predicted ZTVs. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints, and it would be recommended that any pre-application discussions with the local community, and associated reporting on consultation undertaken, take this into account. However, at this stage, The Council is generally satisfied with the VPs selected.	Viewpoint locations for the LVIA were agreed with THC post-scoping. NatureScot made no comment regarding viewpoint locations for the LVIA as part of their scoping response and thus it is considered that they were content with the proposed locations.
			The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. It is important for assessors to remember that Visual Effects are defined by GLVIA3 not just as effects on views, but as 'Effects on specific views and on the general amenity experienced by people'.	The purpose of each viewpoint (representative/specific) and receptor is clearly stated. Visual effects have been assessed in accordance with the requirements of the GLVIA. See Chapter 4: Landscape and Visual Impact Assessment , Technical Appendix 4.1 and Technical Appendix 4.5 .
			The Study Area will be 45km, given the scale of the turbines. Given the size of the turbines and the landscape sensitivities of this site and the surrounding area, we would expect a detailed assessment of effects should be undertaken for the whole Study Area, including for Cumulative Impact Assessment, which should also include an assessment of sequential effects as the receptor moves through the landscape.	The LVIA has been undertaken on a basis that is proportionate to the likely effects that would occur. As such, greater attention is placed upon locations and receptors where significant effects are likely to occur. Refer to Chapter 4: Landscape and Visual Impact Assessment for details of the Study Areas for specific elements of the LVIA.
			Given the cumulative impact of renewable energy in this area it is expected that the applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there may be an associated cost per image to be inserted which should be discussed with the Council prior to submission.	Images will be provided directly to THC, these will not form part of the EIA Report.
			We expect the Landscape Impact Assessment to refer to the Council's Onshore Wind Energy Supplementary Guidance and expect an assessment of the proposal against the criterion set out in the Council's OWESG at pages 19 and 20 to be included within the LVIA chapter of the EIAR. The Proposed Development is situated within Landscape Character Type 134 (LCT134): Sweeping Moorland and Flows as described in the NatureScot 2019 national LCT map. This area is characterized by a gently sloping or undulating landform, offering generous views towards distant mountain ranges and the rugged massif.	Chapter 4: Landscape and Visual Impact Assessment includes an appraisal of how the Proposed Development would perform against each of the OWESG criteria.
			As the heights of the proposed turbines are above 150m, we acknowledge the consideration of Night time Lighting Assessment. Further advice on aviation lighting is available from NatureScot however generally the impact of aviation lighting on WLAs and SLAs and areas where there would be an expectation of dark skies should be included. THC generally prefers the term 'Hours of Darkness' over 'Night-Time' in recognition of how extensive hours of darkness can be in the Highlands. It is pertinent to the assessment to understand that Hours of Darkness Effects will be visible during people's working day and commuting hours for a significant part of the year and that sensitivities of receptors to these effects must account for this. Therefore, Hours of Darkness VPs should be representative of commutes and communities, as well as Wild Land. The selected VPs should be agreed in advance with the Highland Council and NatureScot.	An Aviation Lighting Impact Assessment that accords with current NatureScot guidance is set out in Technical Appendix 4.8 . The terms 'hours of darkness' and 'night-time' are both used as deemed appropriate to the context of the specific sections of text.
			The residential visual amenity impact should be assessed for all properties, settlements, housing groups within 2km of the turbines within the LVIA.	A Residential Visual Amenity Assessment (RVAA) is set out in Technical Appendix 4.7 The RVAA Study Area extends up to approx. 3 km to ensure full coverage of properties just outside the 2 km distance.
			The LVIA should consider effects on the amenity of key transport routes and recreational routes, including a sequential assessment of how the Proposed Development will be experienced in relation to existing and consented wind farms.	Chapter 4: Landscape and Visual Impact Assessment includes consideration of visual effects upon users of key routes, including sequential effects as the routes are travelled
			The LVIA should consider effects on nationally and locally designated landscapes. NatureScot guidance should be followed.	There are no national landscape designations within the 45 km Study Area for the LVIA.

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Consultee	Date	Topic	Comment	Response
				Effects on locally designated landscape are considered in Chapter 4: Landscape and Visual Impact Assessment on the basis set out in the Scoping Report.
		Cultural Heritage	The Highland Councils Historic Environment Team Conservation Officer has reviewed the proposed scoping report and supporting information and noted that the 10km study area is missing a number of A-listed buildings and needs to be re-assessed.	Noted. The cultural heritage gazetteer and study area dataset has been reviewed and updated to ensure full coverage of A listed buildings within 10 km. The assessment is reported in Chapter 5: Cultural Heritage with Technical Appendix 5.1 and Technical Appendix 5.3 .
		Geology, Hydrology, and Hydrogeology	The EIAR should include a full assessment on the impact of the development on peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micrositings limits.	The EIAR includes an assessment of the potential effects of the Proposed Development on peat. Peat probing has been undertaken at all proposed infrastructure within the Developable Area and within micrositings buffers, to cover both 50 m and 100 m, with impacts on peatland/carbon-rich soils/priority peatland habitats assessed and reported in Chapter 11: Geology and Soils , and Technical Appendices 11.1, 11.2 , and the Peatland Condition Assessment, found in Technical Appendix 11.4 .
			Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.	Carbon balance calculations (Scottish Government Carbon Calculator) and wind farm carbon payback is presented in Technical Appendix 2.2
			The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.	Noted. Earthworks and materials management will prioritise secondary/recycled aggregates as reported in Chapter 2: Development Description and Technical Appendix 2.1 .
			The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult SEPA as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.	Chapter 10: Hydrology assesses potential effects on surface water/groundwater, quality/quantity, aquatic ecology and water supplies, with erosion/sediment control, monitoring and contingencies proportionate to high rainfall events.
			The Council's Flood Risk Management Team had no comments to make at this stage. However, there are a number of watercourses and waterbodies on the site therefore the following applies: - A minimum of a 50 m buffer of all watercourses / bodies and turbines/crane hardstandings, which should be shown on a suitably scaled drawing; - All tracks should be kept a minimum 10m away from any waterbody except water crossings; - Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; - Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; - Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change; - Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided. The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment SG.	The design incorporates 50 m buffers (Figure 10.1) from all watercourses, except for watercourse crossings. SuDS for the Developable Area and the Access Corridor, alongside, watercourse crossing embedded mitigation measures will be detailed in a CEMP and implemented at detailed design stage. Access tracks are located outside of the required 10 m buffer as per Figure 10.1 (other than at watercourse crossings) Outline embedded mitigation details for watercourse crossings are set out within Technical Appendix 10.2. The detailed SuDS strategy would be completed in line with the CIRIA SuDS Manual¹⁵ at detailed design stage with consideration of the THC Flood Risk and Drainage Impact Assessment SG. There is no land raising within floodplain within the Site.
			The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	Batching Plant would likely be required for the Proposed Development. The appointed contractor would be responsible for the submission of suitable permit applications under CAR in line with SEPA guidance. The location and type of abstraction would be confirmed at detailed design stage. Should water abstraction not prove feasible, potential alternative sources would be selected in line with the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).
			The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. The report should include details of any monitoring	Desk-based PWS search found that no PWS were located within potential hydrological connectivity to the Developable Area. Therefore potential impacts on PWS was scoped out of further assessment. More details in Chapter 10: Hydrology .

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			prior to, during and following construction. If appropriate, it should also include proposals for contingency measures in the event of an incident. Highland Council has some information on known supplies, but it is not definitive. An on-site survey will be required.	
		Ecology	The scoping report notes that a NVC survey were undertaken within the site, and it is advised to include the results in the EIAR. It is recommended that surveys also cover an appropriate buffer, including any areas where access tracks/track upgrades and borrow pits may be proposed. Target notes should be used to identify the presence of any notable plants including any nationally rare/scarce species. It is advised that survey results are used to inform the design and layout process, so that the development avoids, where possible, sensitive habitats. Where this is not possible, suitable restoration and/or compensation measures should be proposed. Assessment should consider extent of habitat loss and damage, both direct and indirect, with suitable mitigation and/or restoration measures presented in an Outline Habitat Management Plan and, where required, a Peat Management Plan.	Agreed. NVC results are reported in Technical Appendix 6.2 with surveys extended to relevant buffers for tracks/borrow pits.
				Note that the A99 junction will likely impact habitats, but given that roadside habitats are typically habitats which thrive in disturbed areas and are of low sensitivity, impacts aren't expected to be significant. Findings helped inform iterative layout/design to avoid sensitive habitats where possible; where not, restoration/compensation are set out in Technical Appendix 6.6 and Technical Appendix 11.2 . Assessment of direct and indirect impacts outlined in Chapter 6: Ecology .
			The THC's Ecology Officer agrees with the principals of the scoping report with regards to the ecology chapter and would require the assessment to include Highland Nature Biodiversity Action Plan Species and Habitats. Any relevant Species Protection Plans (SPPs) should be made available as part of the EIA report. They welcome the set back of derelict buildings on site which will have a 200m separation distance from any turbines, due to the fact a Schedule 1 bird species was present in these buildings and therefore bats could not be surveyed.	Species and habitat of concern in relation to the Highland LBAP have been assessed in Chapter 6: Ecology . Detailed SPPs have not been provided with the EIA Report as they are informed by a level of design detail not available at this stage. As is established in precedent, the Applicant commits to developing SPPs as design detail develops post consent. THC Ecology officer will be fully consulted on all aspects of the SPPs to ensure the proposed mitigation and enhancement measures are appropriate and proportionate to both the nature and scale of the development and the value of the Site to protected species. As per NatureScot's scoping response, impacts on bats were scoped out of the EcIA.
		Ornithology	The presence of Schedule 1 Birds and qualifying interests of Special Protected Areas and other areas designated for aviary interests must be included and considered as part of the planning application process; not as an issue that can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC.	Schedule 1 and SPA qualifying interests have been fully assessed within Chapter 7: Ornithology , with HRA information provided as Technical Appendix 7.4 (linked to designated sites) and topic-specific ornithology Technical Appendices (e.g., Technical Appendix 7.1 ; Technical Appendix 7.3).
			The SPA connected birds, and legally protected birds in the wider countryside could be affected by the proposal, either as an individual scheme or in combination with other developments in the area.	Noted. Collision, disturbance and displacement effects have been assessed for the Proposed Development alone and cumulatively with nearby developments, following agreed methods. Reported in Chapter 7: Ornithology and Technical Appendix 7.3 .
			The Highland Council Ecology Officer has reviewed the scoping report and would require the applicant should ensure the proposal follows NatureScot's guidance on "recommended bird survey methods to inform impact assessment of onshore windfarms". We are content with the baseline survey and agree with the issues scoped out.	Surveys and assessment followed NatureScot guidance on bird survey methods for onshore wind. Any deviations are clearly justified. Baseline scope/ scoping-out positions are as per consultee agreement. See Chapter 7: Ornithology ; Technical Appendix 7.1 and 7.3 .
			An assessment of the impacts to birds through collision, disturbance, and displacement from foraging / breeding / roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.	Agreed. Methods (vantage points locations, viewsheds, durations) and cumulative approach are set out transparently in Chapter 7: Ornithology and Technical Appendix 7.1 and 7.2 .
		Cumulative Assessment	We would expect the EIAR to cover any cumulative assessments for the proposal, taken into account any larger projects which may impact upon the same ecological/ornithological receptors, including developments which are in planning, under construction or already constructed.	Agreed. Cumulative effects on shared ecological/ornithological receptors consider constructed, under construction, consented and inplanning schemes per an agreed cumulative list. Reported in Chapter 6: Ecology , Technical Appendix 6.4 , and Chapter 7: Ornithology .
		Biodiversity Enhancement	In order to satisfy Policy 3b, The Highland Councils Biodiversity Enhancement Planning guidance must be followed and demonstrate how a minimum target of 10% biodiversity net gain is reached. We recommend the inclusion of a metric assessment, such as the English Statutory Metric (provided as a separated and readable document) to support this.	Details of proposed habitat restoration and enhancement measures are provided in Technical Appendix 6.6 .
			An Outline Habitat Management Plan will be required for detailing all mitigation, offsetting and enhancement measures. This must include detailed management prescriptions, monitoring schedule and landscape plan, for a minimum period of 30 years. All sites marked for enhancement (on site and off site) need to be identified and mapped in the EIA.	Scotland does not legally mandate BNG for developments, nor is there a formally adopted methodology for BNG assessments by a statutory body. The application of the DEFRA metric for calculating BNG is unsuitable given the upland habitat assemblage present at the Site. To satisfy NPF4 Policy 3b, restoration and enhancement measures have been guided by relevant Scottish guidance, and including NatureScot's priority peatland guidance, and the Highland Local Biodiversity Action Plan.

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
		Noise and Vibration	<u>Operational Noise</u> The Environmental Health Team has no objection to such practice provided the surveys have been undertaken or adjusted in accordance with the GPG. They confirmed the noise monitoring and assessment locations look to be appropriate	Historical background noise data collected at the Site has been re-used in the noise assessments.
			Environmental Health preferred noise limits are 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. Should a higher daytime noise limit be sought, the application will require to be accompanied by a supporting argument to justify the choice as described in ETSU-R-97. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels	THC's preferred noise limits have been considered and justification for higher limits has been provided. All information provided within Technical Appendix 8.2
			<u>Cumulative Noise</u> It is unclear whether the development will be considered in isolation to the existing wind farm or if the two will be amalgamated into a single set of noise limits. The noise assessment must consider the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. This requirement can be scoped out where noise levels from the proposed development alone are 10 dB or more below the levels from other wind farms, as measured at any noise sensitive receptor. This relates to predicted levels, not limits. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach regarding noise assessments. The noise assessment must take into account predicted and consented levels from such developments. The good practice guide offers guidance on how to deal with cumulative issues. The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed. There may be some receptors where a relaxation of noise limits has been applied due to the occupier having a financial involvement with a previous wind farm development. It is not necessarily the case that the relaxation will extend to other developments. The assessment should also include a table of figures which includes the following: • The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s. • The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear. • The predicted levels from each existing or consented wind farm development at each NSL. • The cumulative levels based on consented and predicted levels at each NSL.	The assessment includes cumulative noise from existing/consented (and, where appropriate, proposed) wind farms; scoping-out applies only where the Proposed Development is ≥ 10 dB below others at any NSR (predicted levels). Chapter 8: Noise; Technical Appendices 8.1–8.3 include a map of relevant wind farms and NSRs; table of predicted project-only levels (to 12 m/s), predicted levels for each existing scheme, and cumulative level.
			Receptors at which predicted noise levels from the development alone fall out-with the 25dB LA90 can be scoped out of further assessment.	
			The assessment should also include a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.	
			<u>Amplitude Noise</u> Amplitude modulation, operational vibration, infrasound, and low frequency noise can be scoped out from further assessment.	
			<u>Construction Noise</u> Given the separation distances to noise sensitive receptors, it is unlikely that a detailed construction noise assessment will be required in relation to work at the turbine sites however, construction traffic and any access track works are likely to be closer to receptors and this may require detailed assessment. Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. Generally, people are tolerant of construction noise during typical working hours which are taken to be 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be carried out out-with these times. If the applicant intends to undertake noisy work out-with the aforementioned times, they will be required to submit a detailed construction noise assessment for the written approval of the Planning Authority. For the avoidance of doubt, this would include any proposal to run compound generators overnight for the purposes of lighting or drying of PPE etc.	For completeness, a detailed construction noise assessment has been undertaken in accordance with BS 5228. Construction activities which could occur during daytime, evening and weekend, and night-time periods (as defined in BS 5228) have been assessed. Detailed in Chapter 8: Noise and Technical Appendix 8.1 . A Best Practicable Means scheme (including reversing alarms and compaction plant measures) is provided within Technical Appendix 2.1 .

Table 1.4.1: Consultation Register				
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			Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented. Particular attention should be given to the use of tonal reversing alarms and ground compaction plant which are often the most intrusive noise generating elements of a large construction project.	
			<u>Substations and BESS</u> If the application includes a proposal for a sub-station or battery storage site, a separate noise assessment may be required to demonstrate that noise will meet the following standards: - Noise arising from within the operational land of the sub-station, when measured and/or calculated as an LZeq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at noise sensitive premises. - The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated within the operational land of the sub-station, must not exceed the current background noise levels at noise sensitive premises. The Rating Level should be calculated in accordance with BS 4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound. Noise from sub-stations and battery sites would not normally be considered cumulatively with wind farms	TNEI undertook additional consultation with THC, as detailed below.
			<u>Scoping Questions</u> Can the consultees confirm that they agree with the proposed assessment methodologies, specifically the use of ETSU-R-97 and the IOA GPG to assess operational wind turbine noise, BS4142 and BS8233 to assess BESS noise and BS5228 to assess decommissioning and construction noise? Yes Can consultees agree that assessment of decommissioning noise, vibration, low frequency noise and amplitude modulation be scoped out of the EIA? Yes Can consultees confirm that they are happy with the re-use of the background noise and meteorological data collected at receptors around the proposed development in 2019 (for the former project – Stemster Wind Farm) to set noise limits for the proposed development? Yes, provided the measurements have been obtained or adjusted in accordance with the IOA GPG.	Agreed. Methods: ETSUR97 and IOA GPG (operational wind farms); BS 4142 (BESS); BS 5228 (construction). Decommissioning noise, vibration, low frequency noise and amplitude modulation scoped out. Background and met data from 2019 (Stemster) reused subject to IOA GPG checks/adjustments. Chapter 8: Noise; Technical Appendices 8.1–8.3
		Traffic and Transport	A Transport Assessment (TA), Construction Traffic Management Plan (CTMP) and an Abnormal Load Assessment will be required within the EIAR. The Transport Assessment Methodology within the Scoping Response sets out what the Council requires, and further information is provided in our published Roads and Transport Guidelines for New Developments. When establishing a scope for the assessment consideration should be given to the use of the public roads in this area can be influenced significantly by tourist traffic.	Technical Appendix 9.1 includes relevant traffic and transport information relating to Study Area roads, forecast development traffic and the impacts, effects and mitigation required to accommodate development traffic safely and efficiently on the public road network. These information and calculations have been used in the assessment of the environmental effects of traffic and transport. Public roads carrying the Proposed Development traffic are identified. Baseline traffic data analysis has been undertaken. Traffic generation and distribution of the Proposed Development traffic is calculated. Traffic impacts, including cumulative impacts, have been identified and mitigation proposed. Abnormal Indivisible Loads (AIL) loads have been identified for turbine components (blade and tower section). Likely axle loadings for AIL tower section transport vehicles have been identified and their effect on study area roads reviewed. These are included in Technical Appendix 9.1 . An Outline CTMP is submitted with the Chapter 9: Traffic and Transport . A detailed CTMP will be provided via condition once detailed information from a Principal Contractor is available.
		Socio-Economic, Tourism, and Recreation	We consider that Socio-Economic, Tourism and Recreational impacts should be considered even if this is separate to the EIAR to ensure that these matters are appropriately addressed. The assessment should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socioeconomic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should	Noted. A Socio-Economic Statement has been prepared as a standalone document to accompany the application.

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.	Agreed. The EIAR assess effects on core paths, rights of way, NCN and long-distance trails, drawing on THC datasets (via access@highland.gov.uk), Strava Heatmap and Ramblers Paths Map, Chapter 4: Landscape, and Visual Impact Assessment. Visual and physical access effects across all phases will inform the Outline Access Management Plan, this is found in Technical Appendix 2.3 of the EIAR. .
			When assessing the impact on recreational routes please ensure that all core paths, rights of way, national cycle network, and long distance trails are assessed. Information on the core paths, public right of way and wider paths network can be requested from access@highland.gov.uk. Other useful information about patterns of recreational use on site include Strava's Global Heatmap and Ramblers Scotland Paths Map. These should help form a more adequate baseline of information for a comprehensive assessment of the proposal's impact on public access during the construction and operation phases of any development.	
			The potential impact on and mitigation for public access should be assessed incorporating core paths, public rights of way, long distance routes, other paths and wider access rights across the site. While the Scoping Report and an eventual EIA may include impacts on elements of outdoor access assessed under other headings, The impacts on outdoor access should all be brought together here in a comprehensive assessment of the proposals visual and physical impacts on outdoor access during the preparatory, construction, operational and post-operational phases.	
			Those impacts, along with the mitigation measures, will inform an Access Management Plan which is required to be submitted as part of the EIAR and an assessment of the development's impact on public access included within this Socio-Economic section of the EIAR as per the requirements of HwLDP Policy 77 Outdoor Access.	
			As a point to note, any retained or planned gates should have a pass gate installed by them to accommodate walkers, cyclists and horse riders with an internal width of at least 1.5m – kissing gates are unacceptable.	
		Aviation, Radar and Telecoms	The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained within the EIAR to determine whether any suspensive conditions are required in relation to such issues.	The Applicant acknowledges the comments of THC and has engaged with all relevant aviation stakeholders in preparation for submission of this EIA Report. Further details on correspondence with stakeholders is covered below in this table. Likely significant environmental effects on aviation interests are assessed in Chapter 12: Aviation.
			There should be continued dialogue with HIAL over the impact on the radar at airports in the area.	
			If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached	
		Health and Safety	The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the site.	Noted. Climatic factors influencing impacts (rainfall, sunlight, wind) have been addressed across relevant chapters. Potential risks (dust, air emissions, noise, light, shadow flicker), lightning strike and ice throw are assessed with mitigation/monitoring in Technical Appendix 2.1. A dust suppression scheme for construction (including traffic routing/controls) is provided within Technical Appendix 2.1. Shadow flicker is addressed below.
			Depending on the proximity of the working area and access route to any houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements and routing.	
			A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application.	
		Shadow Flicker	Given the reported separation distance from any nearby residential properties, it is accepted that a shadow flicker assessment is not required to be undertaken.	A Shadow Flicker assessment detailed in Chapter 13: Shadow Flicker.
		Forestry	The Forestry Officer notes the proposed wind farm extension is located within open hill ground, to the north west of the existing Golticlay wind farm site. As such, there should be no adverse impact on trees or woodland within the proposed site	Noted. The site lies on open hill ground; no direct effects on woodland are anticipated. If abnormal load routing requires tree works, an Arboriculture Impact Assessment will be provided, with works supervised by a qualified arboriculturist and required consents (planning, landowner, and any Felling Permission) obtained. Reported in Chapter 9: Traffic and Transport.
			Where an Abnormal Load Assessment is required for the Turbine Delivery Route, this must be supported by an Arboricultural Impact Assessment. Any proposed tree surgery or felling must be clearly identified for the consideration and prior written approval of the planning authority. This report must be prepared by a suitably qualified Arboricultural consultant and in accordance with BS5837:2012 (Trees in relation to design, demolition and construction).	
			Any tree protection measures must be clearly specified, along with a detailed Arboricultural Method Statement. All tree works must be supervised by the appointed Arboricultural Consultant.	
			In addition to approval from the planning authority, landowner consent will be required for any tree works beyond the normal road corridor.	

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			A Felling Permission from Scottish Forestry may also be required, unless the proposed tree works are covered by any exemption	
			If forestry is to be scoped out of the EIA, then it is important that any subsequent application minimises any impact on native woodland in order to comply with NPF Policy 6. Should there be a requirement for woodland removal associated with the wind farm development, then this will be considered by the planning authority in consultation with Scottish Forestry.	
		Mitigation	Consequently, the EIAR should present a clear summary table of all mitigation measures associated with the development proposal.	Agreed. Each chapter concludes with mitigation. A consolidated, tabulated Schedule of Mitigation is provided in Chapter 14: Schedule of Mitigation and Residual Effects .
			The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.	
Historic Environment Scotland (HES)	04/03/2025	Cultural Heritage	Based on the information provided so far, there is the potential for significant adverse impacts on the setting of historic environment assets in the vicinity of the proposed development. At this stage we consider that there is the potential that we may object to the development due to these significant adverse impacts.	An assessment of potential significant adverse setting effects has been undertaken, with mitigation by design considered where practicable; engagement with HES post-scoping is detailed accordingly below. Findings reported in Chapter 5: Cultural Heritage with Technical Appendix 5.1-5.3 .
			Recommend that a wider search is undertaken of the surrounding area for potential impacts in the first instance; any impacts to the settings of assets should be assessed appropriately to determine whether these will be significant.	A wider initial search was undertaken using a broad ZTV and professional judgement to identify assets whose settings may be affected; assets where turbines may form background to key views are included. Significance of effect have been assessed and reported in Chapter 5; Cultural Heritage and Technical Appendix 5.3 and the approach is set out in Technical Appendix 4.1/4.2 .
			Consideration should also be given to including assets where even though the ZTV indicates that no direct intervisibility would be possible there is the potential for turbines to appear in the background of key views towards these assets.	
			Scheduled Monuments: It appears that there is likely to be a particularly high level of impact on the setting of two of the monuments within the proposed site boundary: - Achkinloch, chambered cairn 755m SW of, Loch Stemster (SM419) - Achkinloch, stone setting SW of, Loch Stemster (SM420) Both of these nationally important monuments lie within a kilometre of the nearest proposed turbines. The proposals have the potential to impact their setting and cultural significance to such an extent that it may warrant our objection to the proposals. There is the potential for high levels of impact on the setting of other monuments in the surrounding area, including Ballochry, broch 360m S of, Stemster (SM520) which also lies within the site boundary and the Grey Cairns of Camster (SM90056) to the north east and other assets in the wider surrounding area. However, based on the information available in the scoping report it is not possible for us to provide more specific and detailed advice at this stage. We therefore request that further pre-application consultation with us is undertaken.	Further consultation has been undertaken with HES by email throughout the design and assessment process, including a site meeting, which is detailed in Chapter 5: Cultural Heritage . This has resulted in the design of the turbines being altered significantly from Layout 1 (Scoping Layout) to Layout 2 (Design Chill 1 Layout) to reduce the potential for impacts on the setting of the assets highlighted by HES. Full details of the design changes can be found in Chapter 3: Design Evolution and Alternatives , as well as an overview in Chapter 5: Cultural Heritage . The applicant also requested a further meeting with HES to discuss the Proposed Development (by email on 26 th March 2025). Further details of consultation with HES post-scoping is detailed below.
			We request in the first instance, the opportunity to review draft visualisations demonstrating the impacts on the monuments identified above and any other assets within our remit where significant impacts are identified. This additional information may allow us to offer advice on how to reduce the level of impact. In considering impacts on these monuments, we would also recommend that due consideration is given to outside views of/towards the sites, as well as any other elements of setting which may contribute to their cultural significance.	
			An appropriate cultural heritage assessment methodology such as that laid out in Appendix 1 of the EIA Handbook is to be used for the assessment and we welcome the references to our Managing Change Guidance Note series.	The assessment follows Appendix 1 of the EIA Handbook and HES Managing Change Guidance on Setting; methodology and significance criteria set out in Chapter 5: Cultural Heritage and applied in Technical Appendix 5.3 .
			The scoping design layout shown on Figure 1.3 illustrates that direct physical impacts on the three scheduled monuments within the site boundary will be avoided. However, there remains the potential for accidental damage to these nationally important assets and we recommend that mitigation is put in place to avoid this possibility, by fencing off the assets during construction for example.	Mitigation measures are outlined within the Technical Appendix 2.1 and summarised in Chapter 14: Schedule of Mitigation and Residual Effects .

Table 1.4.1: Consultation Register				
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			We do not agree that a 10km study area is appropriate. In light of the scale of the proposals. Its possible that significant impacts may occur beyond the 10km study area referenced in the scoping report. We do not recommend the use of a specific radius for the identification of assets which may receive impacts to their settings. We recommend that in identifying the scope of assessment that a wide ZTV is used in the first instance to identify both assets which may receive impacts and any assets which might themselves fall outwith the ZTV but where important views towards them may have visibility of the turbines in the background of the asset	A fixed-radius limit was not used; a wide ZTV and professional judgement identified assets potentially affected; approach described in Technical Appendix 4.1/4.2
			It is important that the potential cumulative impacts of the proposed development in combination with other Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH Scottish Charity No. SC045925 VAT No. GB 221 8680 15 developments in the vicinity be assessed. In particular, the potential impacts of the proposed Spittal to Beaully 400kV overhead line which is proposed in such close proximity to assets within the site and which has the potential for significant adverse effects on these assets should be assessed for potential cumulative effects as well as the recently consented Golticlay wind farm variation scheme	Cumulative effects on the settings of designated assets have been assessed, including interaction with the proposed SSE Spittal to Loch Buidhe to Beaully 400 kV OHL Connection and Golticlay Wind Farm, alongside other relevant projects; findings in Chapter 5: Cultural Heritage and Technical Appendix 5.3 (cross-referenced to Technical Appendix 4.9).
			Table 7.2 on criteria for magnitude of change refers to changes that would impact on an “ability to understand and appreciate” the value of an asset. Our Managing Change guidance note on setting refers to setting as being the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced. It is important not to exclude how the experience of an asset in its setting contributes to its cultural significance and we recommend that the table is updated to take this element of setting into account. A good practice example of a similar table for criteria for magnitude of impact is available in Appendix 1 of the EIA Handbook. There is the potential for impacts on setting to be underestimated using the current criteria in Table 7.2 which could lead to underestimation of effects using the matrix in Table 7.3.	Agreed. The magnitude of change criteria and effects matrix has been revised to explicitly capture how the experience of setting contributes to cultural significance, aligning with HES Managing Change and EIA Handbook Appendix 1; updated criteria is presented in Chapter 5: Cultural Heritage and applied in Technical Appendix 5.3 .
			Chapter 7 does not identify that visualisations will be provided to support the assessment of impacts. Visualisations, including both wireframes and photomontages will be required to support the assessment.	Visualisations (wireframes and photomontages) support the setting assessment for relevant assets and are included within the EIAR Volume 3b: Visualisations.
NatureScot	04/04/2025	Ecology	Impacts to protected sites: The proposal has the potential to significantly affect the following protected sites: • Flow Country World Heritage Site (WHS); • Caithness and Sutherland Peatlands Special Area of Conservation SAC; • Caithness and Sutherland Peatlands Special Protection Area (SPA); and • East Caithness Cliffs SPA Avoiding impacts to these sites should be a key consideration in the design and layout of the wind farm. In addition, we advise that impacts from essential infrastructure (such as site access and gird connection) will need to be carefully considered at an early stage and should form part of the EIA. Where impacts are identified, the Developer will need to demonstrate that the proposal can be built in this location without adverse effects on these protected sites, both as a single development and cumulatively with other plans / projects affecting these sites. Should significant impacts not be addressed or adverse effects not be avoided, we could object to this proposal.	Potential impacts on sensitive designated features and their qualifying interests are assessed in Chapter 6: Ecology . Potential impacts on Special Areas of Conservation (SAC), have been assessed in Chapter 6: Ecology , and Technical Appendix 6.4 .
			Other elements of the proposal are planned within close proximity of these protected sites. We advise that such works (including storage of materials, borrow pits etc.) should not be proposed within the site boundaries. Robust mitigation measures should also be proposed (and detailed) within the EIA report, to avoid direct and indirect impacts to the protected features of these sites.	Construction elements near protected sites (e.g., materials storage, borrow pits) are excluded from designated site boundaries and buffered; robust embedded and additional mitigation (pollution prevention, drainage controls, monitoring) is set out in Technical Appendix 2.1 , Chapter 10: Hydrology , Chapter 11: Geology and Soils and Chapter 14: Schedule of Mitigation and Residual Effects .
			Further to this, the proposal includes plans for a BESS facility. We advise potential impacts in relation to fire risk and containment of waste water is undertaken for this element of the proposal. The Developer will need to demonstrate that substances relating to a fire event would not be able to enter any of the protected sites to avoid any pollution impacts. Further advice on this is currently being developed, but at this time, should this element of the proposal be progressed, we advise that an Emergency Response Plan is produced. This should outline the impacts to the protected sites as a result of a fire event and include details of appropriate mitigation measures that would be put in place to avoid this. Such a plan should also adhere to the National Fire Chiefs Council guidance, available from: https://nfcc.org.uk/consultation/draft-grid-scale-energy-storage-system-planning-guidance/ .	The BESS design will ensure no firewater or contaminants can reach protected sites. Controls are embedded in Technical Appendix 2.1 .
			We further advise that any habitat management works and enhancement measures are carefully designed as so not to elevate the level of risk (or result in additional significant impacts) to protected sites. Given the connectivity with these sites, details of these works will be required as part of any future application to allow for further assessment.	Habitat management and enhancement proposals designed to avoid elevating risks to protected sites; full details and mapping included within Technical Appendix 6.6 and Chapter 6: Ecology .
			a) Flow Country WHS	

Table 1.4.1: Consultation Register				
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			The proposal site lies immediately adjacent to this WHS, protected for its globally important blanket bog system.	As noted in THC’s Pre-Application Response (22 April 2025), the WHS Impact Assessment Toolkit was updated in June 2025, which now only considers criterion (ix) Blanket bog. Potential impacts on the Flow Country WHS have been assessed in Section 6.12 of Chapter 6: Ecology using THC Impact Assessment Toolkit Version 2 in Technical Appendix 6.5 .
			We note some of the maps provided with the SR do not include this site and we highlight that the boundary of the WHS is different in places to the nearby SAC/SPA e.g. along the south and southeast boundary of the proposal site.	
			The Outstanding Universal Value (OUV) of the site encompasses several attributes relating to blanket bog and ecosystem processes. Where a proposal affects 1 or more of these attributes, this could result in impacts on the site’s OUV. Impacts on the OUV as a result of the proposal will therefore need to be carefully considered within the EIA.	
			We strongly encourage the Developer to use the toolkit produced by THC to assess impacts to the WHS3. However, the Developer should note that this toolkit was developed prior to inscription of the WHS and need to be updated to reflect UNESCO’s decision. The toolkit should still be used in the meantime but note there is no need to consider assessment of criterion (x) (i.e. species associations) as shown currently in the toolkit. Only criterion (ix) for peatland ecosystem quality is required.	
			b) Caithness and Sutherland Peatlands SAC The proposal also lies immediately adjacent to this SAC, protected for its peatland and freshwater habitats, marsh saxifrage and otter. From the SR, it appears that survey work to inform an assessment of impacts to the SAC features will follow recommended guidance and our standing advice for otter. Specifically, where otter activity is identified, it is highly likely this will be linked to the SAC population, given the proximity of the SAC. Assessment will therefore be required in context of the SAC conservation objectives for this species. We note that Turbine 9 is on the boundary or close to the SAC, and that the access track between Turbine 9 and 10 runs along the SAC boundary. Both elements could have significant adverse impacts on hydrology of the SAC. We advise that the Turbine 9 and its associated hardstanding is pulled back from the SAC and that the track between Turbine 9 and 10 either removed entirely or moved away from the SAC to avoid adverse hydrological impacts. Turbine 10 hardstanding could also impact on the SAC, and we consider that it should be reduced or orientated differently to provide a bigger buffer from the SAC. In addition, we note that it is also proposed to access turbine 10 via a short section of track from existing windfarm tracks from the south. Removing the track between turbines 9 and 10 would reduce impacts on the SAC and wider peatland habitats as well as rationalising of tracks and built infrastructure.	The assessment of SAC features (peatland/freshwater habitats, marsh saxifrage, otter) followed current guidance and NatureScot standing advice, as set out in Chapter 6: Ecology . Mitigation measures are outlined in Technical Appendix 2.1 and Technical Appendix 6.4 .
			c) Caithness and Sutherland Peatlands SPA This SPA has the same boundary as the SAC above and is protected for its upland breeding waders, waterfowl and raptors. A detailed assessment of the impacts to this SPA will be a key part of the EIA and we would expect full details to be provided in the EIA Report to allow for future assessment. The assessment of impacts should follow our <i>Recommended bird survey methods to inform impact assessment of onshore windfarms</i> . - In relation to the submitted Scoping Report, we have the following advice in relation to this SPA: Without further information, we cannot comment fully on whether the survey work undertaken for this proposal is sufficient to inform a detailed assessment of impacts to the SPA. - It is also not known how forestry works in and around Golticlay have been considered during surveys, especially those from before 2020. Further detail on this will be required to demonstrate this has not significantly impacted the results of survey work. - We agree with the Developer’s intention to undertake further assessment that focusses on loss of habitat, disturbance / displacement and collision risk to SPA species. We advise that any barrier effects are also included in such an assessment. We note that the applicant proposes to do a cumulative assessment for proposals within 5km, however, we advise that the cumulative assessment should be undertaken for the SPA. - We note that the applicant intends to use survey data from 2020 but is supplementing this with additional survey work from 2024 and 2025. While the 2017 -2020 data is considered useful background, we advise that the date ranges currently proposed for inclusion from the 2020 data may be more than 5 years old at time of submission should be considered to be context only. This may require additional ornithology survey work to be undertaken. - An assessment will therefore be required in context of the SPA conservation objectives.	Turbine T9 was removed from the turbine layout, and T10 was repositioned further south from the SAC. Further details of iterations to the turbine layout are outlined in Chapter 3: Design Evolution and Alternatives .
				A Shadow Habitats Regulations Appraisal is provided in Technical Appendix 7.4 . There is no forestry within the Site and limited bird interest in the areas of Golticlay Forest that lie within the study area (Figure 7.2). Forestry works did not impede surveys in any way
				Barrier effects have been considered within the Operational Effects section of Chapter 7: Ornithology .
			d) East Caithness Cliffs SPA	Further surveys have been undertaken to ensure all data used within the assessment is under five years old. Dates of all current survey work are provided in Technical Appendix 7.1 . A Shadow Habitats Regulations Appraisal is provided in Technical Appendix 7.4 .

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			The proposal lies within foraging range for gulls from the East Caithness Cliffs SPA.	East Caithness Cliffs SPA has been scoped into the EIA; an assessment of relevant species (e.g., herring gull, great black backed gull) is provided in Chapter 7: Ornithology and Technical Appendix 7.1/7.3 and Shadow Habitats Regulations Appraisal cross referenced in Technical Appendix 7.4 .
			We agree that the East Caithness Cliffs SPA (herring gull and great black-backed gulls) should be scoped into the EIA assessment.	
			All gull species should be included in the cumulative assessment and as above for the Caithness and Sutherland Peatlands SPA this assessment should be for the entire SPA and not only for proposals within 5km of this proposal.	
		LVIA	(From Annex A)	It was agreed with NatureScot to include consideration of WLA36 in the LVIA, noting that this would consist of additional text in the chapter to highlight wild land qualities in the land west of the A9. In accordance with the requirements of NPF4, a detailed assessment of effects on wild land would not be required. The assessment of effects on SLA6: The Flow Country and Berriedale Coast included in Technical Appendix 4.6 acknowledges the presence of wild land qualities within the designation. An overview of effects on WLA36 are included in Chapter 4: Landscape and Visual Impact Assessment
			The proposal lies approximately 2km from Wild Land Area (WLA) 36: Causeymire – Knockfin Flows.	
			Our advice focuses on impacts to Scotland's landscapes that could potentially raise issues of national interest. In this case, our advice relates solely to the effects on the distinctive character across these WLAs which flank the proposal. However, this should not be interpreted that there are no other landscape and visual effects that need to be considered as part of the EIA.	
			Given the location of the proposal, it has the potential to result in impacts on the character and quality of the WLA. Due to the layout, scale and requirement for aviation lighting, there is potential for extensive significant effects on the character and strong sense of remoteness and naturalness of this area, both during the day and at night.	
			a) Assessment of wild land qualities We advise that an assessment of effect on the character and qualities of the WLAs is undertaken and the scope of the assessment is agreed in advice with us, as outlined in our technical guidance. This should include the sharing of draft assessment points, routes and the qualities that are likely to be affected. Agreeing this in advance will ensure that an assessment is both focused and useful in minimising significant effects.	
			b) Night-time lighting effects Lighting has the potential to affect both landscape character and visual receptors. The night-time assessment should follow our recently published guidance on lighting assessments ¹¹ , and the scope of the assessment should be agreed with us prior to submission of the application. We are now aware of the requirement for turbine lighting given the height of both the consented Golticlay and the proposed extension. We are unclear, and seek confirmation, if the consented Golticlay wind farm will include visible aviation lighting as Condition 6 of the proposal appears to set out that only infra-red lighting will be required. Given these wind farms are put forwards by the same Applicant, a turbine lighting scheme may be developed for the entire cluster that seeks to either omit or minimise the number of visible lights in order to minimise any significant effects on the appreciation of dark skies both from those travelling through the area and from the more remote landscapes to the west.	
		Peat and Soils	While the proposal lies within an area of commercial forestry, there is potential for the proposal to affect nationally important peatland habitat. Where impacts are identified, the Developer will need to demonstrate how such impacts have been overcome by siting, design or mitigation.	The Site is not located within an area of commercial forestry. The assessment has demonstrated how the project demonstrates avoidance/minimisation of effects on nationally important peatland through; design and siting of the Proposed Development, and where this is not practicable mitigation has been provided to reduce the potential impacts. This is described in Chapter 2: Development Description and Chapter 3: Design Evolution and Alternatives . Chapter 11: Geology and Soils and Chapter 6: Ecology present a summary of how potential impacts on the nationally important peatland have been reduced, Technical Appendices 6.6 and 11.2 , outline mitigation and management measures and are summarised in Chapter 14: Schedule of Mitigation and Residual Effects .
			The proposal lies within an area of Class 1 and Class 2 and these areas are described as nationally important carbon-rich soils, deep peat and priority peatland habitat likely to be of high conservation and/or restoration value. We refer the Developer to our recently updated guidance on development management and peatland for more information on the assessment of these interests. Survey and assessment should inform the project design and, where peat is present, the mitigation hierarchy should be followed to ensure any significant effects can be	

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			overcome by siting, design or other mitigation measures. We also advise that survey work to inform such an assessment should be undertaken in accordance with Scottish Government guidance: We would also strongly encourage the Developer to include a summary table in relation to peatland of national importance as part of the EIA to aid assessment of the potential impacts. The Developer could use our template table ' <i>Site visit template for the assessment of peatland on proposed development sites</i> ' which is included in our peatland and development guidance.	
			The applicant proposes to scope out impacts on common and widespread habitats as effects upon are unlikely to be significant in EIA terms. It is not clear how the applicant defines common or widespread habitats in this context and clarification is therefore required. For instance, peatland habitats across the Caithness and Sutherland could be considered to be a common and widespread habitat. All habitats should be scoped in unless further justification is provided by the applicant.	To ensure a robust assessment, this chapter has considered impacts on all 'habitats of conservation Interest'. Habitats of conservation Interest are those defined by their Annex 1 status, Scottish Biodiversity List listing and/or inclusion in the Highland Biodiversity Action Plan. As most habitats identified as Annex 1 habitats were also considered priority peatland habitats, they have been assessed using geographically-based valuations , attributed to them in NatureScot's guidance ¹⁷ (in Chapter 6: Ecology). This ensures their value and importance has been considered in an appropriate policy context. Results of the habitat surveys are presented in Technical Appendix 6.2
			While the applicant has attempted to avoid deep peat, we advise that revisions to the track, turbines and associated infrastructure could be made to further reduce impacts on peatland habitats.	The infrastructure layout has been refined through an iterative design process, outlined in Chapter 3: Design Evolution and Alternatives , to further reduce effects on peatland habitats, Chapter 11: Geology and Soils outlines residual effects/mitigation, supported by Technical Appendices 11.1, 11.2, 11.3, 11.4 , and summarised in Chapter 14: Schedule of Mitigation and Residual Effects .
			We welcome the Developer's intention to provide an outline Habitat Management Plan, Outline Peat Management Plan, Outline Construction Environment Management Plan and Peat Landslide Hazard Risk Assessment as part of the EIA Report. Such plans should demonstrate how restoration, offsetting and enhancement will be achieved and be sufficiently detailed to allow assessments to be carried out.	The EIAR includes details on habitat management proposals in Technical Appendices 6.6 , construction methods in Technical Appendix 2.1 and peat landslide hazard risks in Technical Appendix 11.3. Each of these documents count with sufficient detail on restoration, offsetting and enhancement to support the assessment.
		Ecology	There are other impacts on the natural heritage that the Developer will need to consider during the EIA process. This includes, but is not limited to, impacts to protected species and deer. We refer the Developer to our updated pre-application guidance for onshore wind farms to help inform the work carried out for the EIA Report.	Potential impacts on protected species (non-avian) have been informed by a desk study (Technical Appendix 6.1) and protected species surveys (Technical Appendix 6.3). Impacts on protected species have been assessed in Chapter 6: Ecology . Potential impacts on ornithological features have been assessed in Chapter 7: Ornithology .
			Full details of the ecology surveys are not available at this stage. We welcome that the Scoping Report makes reference to the possible need for further survey work following initial survey results. Surveys from the previous Stemster windfarm would be considered to be out of date and these surveys should be updated in line with our guidance on protected species surveys ⁸ . We advise that the species surveys undertaken in 2019 and 2020 are repeated. We agree that bat surveys are not required given the lack of suitable habitat within the area. We advise that the applicant provides details of the mitigation within Species Protection Plans as part of the EIA Report.	The EIAR presents updated ecology surveys and commits to further targeted work where initial results indicate; scope and timings are outlined in Chapter 6: Ecology and Technical Appendix 6.1/6.3 . 2019–2020 protected species surveys from Stemster have been repeated/updated as per current guidance; bat surveys are not required given limited habitat, as agreed; methods/results in Technical Appendix 6.3 and Chapter 6: Ecology .
			In relation to deer, we advise that the developer prepares a Deer Management Statement which would be factored into the Habitat Management Plan. We advise that an assessment on the direct and indirect impacts to deer will be required as part of the EIA. It will also be particularly important for a proposal in this area to carefully assess the impact of deer on neighbouring protected sites (e.g. if changes in deer movements could adversely affect the peatland habitats of the WHS and peatlands SAC). We refer the Developer to our guidance on Deer Management Plans ⁹ for more information.	A Deer Management Statement (DMS) has been provided in Technical Appendix 6.8 , which includes an assessment of potential impacts as a result of deer on neighbouring protected sites (e.g. Flow Country WHS and SAC). The proposals outlined in the DMS and their impact on habitat management plans is discussed in Technical Appendix 6.6 .
		Ornithology	We do not have full details of some of the surveys carried out or sight of the survey results, we therefore cannot provide full comment on the suitability of survey work at this stage.	Thirty-six hours from each Vantage Point (VP) in each breeding or non-breeding season have been undertaken in each year. This is in accordance with NatureScot guidance (SNH, 2017)
			The applicant states that ' <i>A total of at least 36 hours of observation will be completed during two breeding seasons, where between April and August is considered the breeding season and will be completed during two non-breeding seasons where between September and March is considered the non-breeding season.</i> ' It is not clear from this, if the proposal is to do 36 hours across the year or if the proposal is to do 36 hours across two years. We advise that survey methods should follow our <i>Recommended bird survey methods to inform impact assessment of onshore windfarms</i> .	
			The VP do not cover the entire site boundary area or the survey area. In particular, we note that Loch Stemster and Loch Rangag are not covered by the survey and may need further survey effort, unless the applicant can justify why they have not covered as these lochs, as they may be used by SPA species. Similarly, we note that the one vantage point lies within the survey area, and an explanation should be provided on how the applicant has dealt with the issue of potential observer effect on the birds. In addition, the applicant should set out clearly whether the vantage points were surveyed at the same time.	According to NatureScot guidance (SNH, 2017) flight activity surveys from vantage points need only cover the finalised turbine locations and a 500 m buffer (not the application boundary or survey area), and these are adequately covered. See Figure 7.3 and Technical Appendix 7.1 & Technical Appendix 7.3 .

Table 1.4.1: Consultation Register				
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				According to NatureScot guidance (SNH, 2017) vantage points are “best located outside the survey area where possible”. In this instance efforts were made to locate vantage points outside the survey area but there were constraints caused by nest locations of Schedule 1 raptor species. Over 80% of the Flight Activity Survey Area (FASA) has been covered by the viewsheds. More detail on the flight activity survey methodology can be found in Technical Appendix 7.1 .
			Where a collision risk is identified, Collision Risk Modelling should be undertaken. Our guidance on the collision risk model has recently been updated and we would expect the Developer to follow this guidance when undertaking their assessment for this proposal.	Collision risk modelling has been undertaken in accordance with current guidance and is provided in Technical Appendix 7.3 .
			We consider that a cumulative assessment with other plans/projects affecting birds from the wider countryside will be an important part of the EIA. The assessment should be extended to ensure that all relevant SPAs and not only those within 5km of the proposal. We also confirm we would be happy to provide further advice on the developments and figures to include in such an assessment. We recommend the Developer contacts us directly for this when they are ready to undertake their collision risk assessment.	Cumulative effects have been considered in full and in-line with relevant good practice. Findings are reported in Chapter 7: Ornithology .
SEPA	24/02/2025	Peat and Soils	Figure 12.4 of the Scoping Report shows that several of the turbines (T10, T12, T15, T17) and sections of track would be located in areas of deeper peat. This would not be acceptable to SEPA. The proposed turbines and other infrastructure should be relocated outwith areas of deeper peat where possible, or justification provided as to why this is not possible.	Further stages of peat probing have been conducted in all Developable Areas of the Site in which infrastructure is proposed, and across the full micro siting buffers, both 50 m and 100 m. Results have been mapped and used to inform design. Methodology and findings are presented in Technical Appendices 11.1 and 11.2 .
			We note that some locations within the red line boundary have had peat probing undertaken, with the rest of the site having interpolated peat depths. Section 12.1.0 of the Scoping Report states that “a higher resolution peat probing survey will be undertaken (if required)...will ensure that all infrastructure locations have sufficient peat depth information...”. We confirm that such survey work will be required where infrastructure is proposed, plus any micro-siting buffer.	The infrastructure layout has been refined through an iterative design process, outlined in Chapter 3: Design Evolution and Alternatives , to further reduce effects on peatland, with additional residual effects/mitigation outlined in Chapter 11: Geology and Soils and summarised in Chapter 14: Schedule of Mitigation and Residual Effects .
		Ecology/Hydrology	In relation to GWDTE , we welcome the proposed consultation with us regarding the status of GWDTE at the site, as set out in section 12.0.8 of the Scoping Report. This should enable a decision to be made about whether hydrological assessment of GWDTE could be scoped in or out.	The Applicant has provided an assessment of GWDTE status and necessary mitigation in Technical Appendix 10.1 .
		Ecology	SEPA note from section 5.1.6 of the Scoping Report that NVC surveys have been undertaken. These should be used to provide information in the EIA Report about how the layout has been designed to avoid and then, where this is not possible, minimise adverse effects on GWDTE.	Details of the NVC survey undertaken, including results, are provided in Chapter 6: Ecology . Further information on NVC surveys is provided in Technical Appendix 6.2 . and Figure 6.5 shows areas of guidance-stated potential GWDTE. A full assessment on GWDTE is provided in Chapter 10: Hydrology and Technical Appendix 10.1 .
		Hydrology	In relation to groundwater supplies , referring to Figure 12.2 of the Scoping Report, it appears unlikely that any development will take place within 250m of a groundwater supply source. It would be helpful if the EIA Report provides sufficient information to confirm this for the final layout.	Chapter 10: Hydrology confirms that no Private Water Supply/groundwater abstraction is found within 250 m of the Proposed Development, see Figure 10.2 .
			In relation to flood risk , based on the available information, provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses, then we do not foresee a need for detailed information on flood risk.	All new or upgraded watercourse crossings will be designed to the 1 in 200-year event plus climate change, and all other infrastructure will be located well away from watercourses. Details are provided in Technical Appendix 10.2 with construction controls in Technical Appendix 2.1 .
			In relation to the water environment , we note that Figure 12.1 of the Scoping Report indicates that the proposed meteorological mast appears to be within the 50m watercourse buffer. If the proposed meteorological mast is a new mast (rather than replacing an existing mast), then it should be located outwith the buffer area.	
			With the exception of what appears to be two new watercourse crossings, other infrastructure would be outwith a 50 m buffer from watercourses, which is welcome.	The construction working corridor widths and locations have been defined and, where practicable, set outwith watercourse buffer areas; where encroachment is unavoidable (e.g., at crossings), specific protection measures will be detailed.
			It is important that the construction working corridor is also outwith the buffer areas, where possible, to reduce the risk of adverse effects on the water environment. It would be helpful for the EIA Report to provide clarification on the construction working corridor	The proposed meteorological mast has been located outside of the 50 m watercourse buffer for the Proposed Development (Figure 10.1).
Governmental Advisors				
Scottish Forestry	17/02/2025	Forestry	The scoping report indicates there will be no loss of woodland, as such Scottish Forestry will not provide a formal response. If the development does impact woodland, please consider consulting Scottish Forest.	Noted.
Transport Scotland	04/03/2025	Traffic and Transport	Transport Scotland is satisfied with the locations for transport surveys.	The agreed survey locations have been adopted and reported in Chapter 9: Traffic and Transport and Technical Appendix 9.1 .
			Transport Scotland would state that National Road Traffic Forecast (NRTF) Low Traffic Growth assumptions should be used to provide a common future year baseline to coincide with the expected construction traffic peak.	NRTF Low Traffic Growth has been used to derive the common future year baseline aligned to the construction traffic peak; assumptions and forecasts will be set out in Chapter 9: Traffic and Transport and Technical Appendix 9.1 .

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			It is noted that any impacts associated with the operational and decommissioning phases of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance.	
			Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	A full Abnormal Loads Assessment is provided, findings and mitigation are reported in Technical Appendix 9.1 , and Chapter 9: Traffic and Transport .
			Any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager and all land needed for mitigation must either be contained within the road boundary or within areas under the applicant's control.	Any proposed changes to the trunk road network will be discussed and progressed through Transport Scotland's technical approval process with the relevant Area Manager; required mitigation land will be contained within the road boundary or land under the Applicant's control. This is set out in Technical Appendix 9.1 and Chapter 9: Traffic and Transport .
			Prior to the movement of any blades along the trunk road network utilising blade lifter technology, details of the blade lifter technology to be utilised on the trunk road will require to be supplied to Transport Scotland as trunk roads authority for approval. This is to include a risk assessment, method statements and additional information as requested by Transport Scotland. In addition, with regard to the proposed transshipment site on the A99(T) south of Wick, we note that no specific details have been provided at this stage. If the area is to be included within this application then full details should be provided including details of any trunk road access junctions. We acknowledge that details of the transshipment area may not be fully known at this stage and if this is the case then we would anticipate a separate planning application at a later date.	Prior to any use of blade lifter technology, the Applicant will submit details, risk assessment, method statements and any additional information requested to Transport Scotland for approval. Details are included in Technical Appendix 9.1 and referenced in Chapter 9: Traffic and Transport .
Non-Statutory Consultees				
Aberdeen Airport	13/02/2025	Aviation	This proposal is located outwith the consultation area for Aberdeen Airport. No comment to make and need not be consulted further.	The Applicant acknowledges the comments of Aberdeen International Airport. As no adverse impacts are anticipated, this receptor is scoped out of the EIA.
British Horse Society Scotland (BHSS)	28/02/2025	Socio-economics	Core paths CA10.11 (Achavanich and Munsary) and CA10.16 (Achavanich Stone Setting) are within the site boundary. In addition, the site access track passes through Rumster Forest, where there is a network of paths and tracks which are popular with walkers, cyclists and equestrians. Access to paths and tracks is especially valuable in areas where extensive peat bog makes it difficult or unsafe for access takers, especially those with horses, to make their own way across open ground. Consideration should therefore be given to how access will be maintained and managed both during the construction phase and when the windfarm is operational. Obstructions to access like cattle or deer grids and locked gates with no side gate should be avoided. I encourage the applicant to produce an Outdoor Access Management Plan to accompany their application	Core paths will be maintained and managed through construction and operation via the Outline Access Management Plan (OAMP) (Technical Appendix 2.3).
BT	03/03/2025	Telecommunications	T15, T16 and T17 could cause interference to BT Radio link 12803 from BEN a CHIELT RSNOSHEB to HALSARY WIND FARM, therefore BT object to the current positioning/location of the 3 named Turbines .	Turbine T15 and T17 have been removed from the turbine layout. Details of the Proposed Development's iterative design process is included in Chapter 3: Design Evolution and Alternatives .
			BT requires 100m minimum clearance from any structure to the radio link path. Please review our objection to T15, T16 and T17 and reconsult us if there are any changes to the location and we will reassess for you.	
Civil Aviation Authority (CAA)	No Response Received			
Crown Estate Scotland	No Response Received			
Defence Infrastructure Organisation (DIO)/ Ministry of Defence (MOD)	26/02/2025	Aviation/ Infrastructure	The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.	The Applicant acknowledges the comments of MoD and commissioned an aviation lighting assessment from WFLFAC in order to determine an appropriate visible aviation lighting scheme. The assessment report can be found at Technical Appendix 12.1 . CAA has since approved the reduced lighting scheme and their response can be found at Technical Appendix 12.2 . Further details contained within Chapter 12: Aviation .
			In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft	
			operating in the area.	
			To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.	
			The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.	
			As a minimum the MOD would require that the perimeter turbines are fitted with MOD accredited Infrared (IR) beacons.	

Table 1.4.1: Consultation Register				
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			Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	
Caithness District Salmon Fishery Board (Caithness DSFB)	02/04/2025	Fisheries	The Caithness DSFB have no comment to put forward.	Noted
Edinburgh Airport	03/03/2025	Aviation	In respect of the above, I can confirm the location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.	The Applicant acknowledges the comments of Edinburgh Airport. As no adverse impacts are anticipated, this receptor is scoped out of the EIA.
Fisheries Management Scotland	No Response Received			
Flow Country Rivers Trust	No Response Received			
Glasgow Airport	12/02/2025	Aviation	This proposal is located out with the consultation area for Glasgow Airport. No comment to make and need not be consulted further.	The Applicant acknowledges the comments of Glasgow International Airport. As no adverse impacts are anticipated, this receptor is scoped out of the EIA.
Glasgow Prestwick Airport	10/02/2025	Aviation	The proposed development lies outside the GPA safeguarding area, and consequently no comment or valid objection to make.	The Applicant acknowledges the comments of Glasgow Prestwick Airport. As no adverse impacts are anticipated, this receptor is scoped out of the EIA.
Highlands and Islands Airport Ltd (HIAL)	28/02/2025	Aviation	Preliminary assessment shows that, at the given position and height, this development may impact the safeguarding criteria and operation of Wick Airport.	The Applicant acknowledges the comments of HIAL and has engaged Sagentia (formerly Osprey) Consulting Services to carry out an IFP assessment for Wick Airport. The IFP assessment report can be found in Technical Appendix 12.3 . Further details on this receptor are contained in Chapter 12: Aviation .
			HIAL request that an Aviation Impact Feasibility Study (AIFS), of the proposed development, is undertaken to understand any impact on the infrastructure and operation of Wick Airport. The following are required to be assessed by the applicant:	
			- Instrument Flight Procedures (IFPs): Please see CAP785 requirement. The IFP Assessment MUST be produced by an Approved Procedure Design Organisation (APDO). A list of APDO can be found on the CAA website: Approved procedure design organisations Civil Aviation Authority (caa.co.uk)	
			- Lighting Requirement: For further information please refer to Advice Note 2 'Lighting' (available at http://www.aoa.org.uk/policy-campaigns/operations-safety). Please also consider the lighting requirements as documented in The Air Navigation Order 2016, Article 222	
Health and Safety Executive (HSE)	13/02/2025	Hazardous substances	The proposed development is not a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning.	Noted. Based on the current design, no storage or processing of hazardous substances at or above control thresholds is proposed; this is outlined in Technical Appendix 2.1 .
			The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.	The site is outside safeguarding zones for Explosives Regulations 2014 and Dangerous Goods in Harbour Areas Regulations 2016 licensed sites.
			The development is not located within HSE's land-use-planning consultation zones for major accident hazard pipelines and hazardous substances consented sites.	The site is outside HSE landuse planning consultation zones for major accident hazard pipelines and hazardous substances consented sites
			Due to the above 3 points, HSE have no views on the information to be included in an EIAR.	Noted. Employers will undertake early project risk assessments to ensure compliance with relevant health and safety legislation (including CDM Regulations), with measures captured within Technical Appendix 2.1 .
			If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please directly consult the operator of the establishment, as appropriate.	
			HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk	

Table 1.4.1: Consultation Register				
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			assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.	
John Muir Trust	No Response Received			
Joint Radio Company (JRC)	12/02/2025	Telecommunications	This proposal is cleared - subject to 50m Micrositing - with respect to radio link infrastructure operated by the local energy	Noting clearance is date limited and spectrum use dynamic—reconfirmation will be sought preconstruction.
			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 reevaluate the proposal.	
			JRC cannot 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.	
Mountaineering Scotland	No Response Received			
National Air Traffic Services (NATS)	17/02/2025	Aviation	The proposed development has been examined by NATS technical safeguarding teams.	Noted. The Applicant has continued to engagement with NATS technical safeguarding teams, and develop an agreed safeguarding/mitigation solution. Outcomes and any commitments are reported in Chapter 12: Aviation .
			In the timeframe given, NATS have been unable to thoroughly investigate the effects of the proposed development on Operations, however, the relevant teams are being consulted.	
			Based on preliminary technical findings, the proposed development does conflict with safeguarding criteria.	
			Accordingly, NATS (En Route) plc objects to the proposal. NATS notify you within 4-6 weeks of the results of	
			operational assessment. Only if this assessment shows the impact to be acceptable will NATS be able to withdraw our	
			objection.	
	12/05/2025	Aviation	Overall Objection NATS has objected to the proposed Golticlay Wind Farm Extension (Ref: SG38883). Their technical safeguarding teams found that the development conflicts with safeguarding criteria. Local authorities are legally required to consult NATS, and if recommendations are not accepted, notification to NATS and the Civil Aviation Authority (CAA) must be made in accordance with Planning Circular 2/2003.	The Applicant acknowledges the comments of NATS and engaged by email on 13 May 2025, in order to ascertain potential mitigation options available. NATS responded on 30 May 2025 confirming that a possible mitigation solution had been identified and have since been approved internally within NATS.
				Likely significant environmental effects on NATS ATC operations are assessed in Chapter 12: Aviation .
			Radar Impact – Alanshill Radar The turbines are predicted to cause false primary plots and a reduction in detection probability at Alanshill Radar. Terrain screening is insufficient to attenuate the signal.	Aviation assessment is detailed in Chapter 12: Aviation .
			Operational Radar Assessment Operational consultation results: Aberdeen ATC – acceptable; Prestwick Centre ATC – unacceptable; Military ATC – acceptable.	
			Navigation Aids Assessment No impact is anticipated on NATS' en-route navigation aids.	
			Radio Communications Assessment No impact is anticipated on NATS' en-route radio communications infrastructure.	
Oban Airport	No Response Received			
Office of Nuclear Regulation (ONR)	11/02/2025	Nuclear Regulation	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site	Noted
	11/02/2025	Planning	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted.
RSPB	03/03/2025	Ornithology	The site is within connectivity distance to the Caithness Lochs SPA; and Section 12.0.1 suggests the site is hydrologically connected to the River Thurso SAC. In addition, it is highly likely that the site is hydrologically connected to the Caithness and Sutherland Peatlands SAC, Shielton Peatlands SSSI and the Flow County World Heritage Site.	The EIAR has assessed connectivity with designated areas; pathways and risks are addressed in Chapter 6: Ecology with Technical Appendix 6.4 and Technical Appendix 6.5 .
			Section 6.5 asks “Do the consultees agree that the following qualifying species for the East Caithness Cliff[s] SPA can be scoped out of the EIA given the lack of connectivity: peregrine, cormorant, common guillemot, northern fulmar, black-legged kittiwake, razorbill, Atlantic puffin and shag?” We are content with this but request that Herring and Great Black-backed Gull are scoped in.	Herring gull and great blackbacked gull have been scoped into the assessment provided in Chapter 7: Ornithology and Technical Appendix 7.1/7.3/7.4 .

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			A number of the qualifying species of the above listed sites could be affected by the proposal due to their use of the proposed site and surrounding area for breeding, roosting and foraging. There are also other species that are red or amber listed Birds of Conservation Concern , including Curlew, Redshank, Oystercatcher, Lapwing and Snipe which are present in the area and could be affected by the development.	Where appropriate qualifying species and BoCC have been assessed for breeding/roosting/foraging effects; methods, baseline and mitigation are found in Chapter 7: Ornithology .
			From the information available at this stage, it appears that there would be likely significant effects on the qualifying interests of Caithness and Sutherland Peatlands SPA and SAC and Caithness Lochs SPA from the proposed wind farm alone or in combination with other projects. Therefore, the EIA Report must include sufficient information to inform an Appropriate Assessment, as required by the Conservation of Habitats and Species Regulations 2017.	Information to inform an Appropriate Assessment is provided in Technical Appendix 7.4 .
			Lastly, the site lies approximately 2km from the RSPB Forsinard Flows reserve at its closest point, a large site undertaking landscape scale peatland restoration and managing the upland breeding bird assemblage; and approximately 1km from Plantlife's Munsary Reserve, and public access to this reserve is through the proposed wind farm boundary.	Noted. Proximity to Forsinard Flows and Plantlife's Munsary Reserve and the public access route through the site has been considered in design, access management and impact pathways.
			A scoping exercise should help inform survey design. Almost two years of surveys have already been undertaken (between April 2022 and March 2025) and unfortunately it appears too late for us to input on this aspect in a meaningful way. There is a risk that an inadequate amount or quality of data will be collected for some species if they have not been considered adequately from the start. For example, it would have been prudent to include Common Scoter in the suite of Scarce Breeding Bird surveys. We understand that a female and large chick were recorded on BirdTrack in close proximity to the proposed development in 2024.	Although not included in the scoping report, surveys for this species were undertaken in conjunction with breeding diver surveys on suitable waterbodies within the study area. Survey methodology is provided in Technical Appendix 7.1 .
			Data collected between September 2018 and August 2020 (described in section 6.1.6) is now too dated according to NatureScot guidance2 , and should not be used for the assessment, although we agree it could be used for context	2018–2020 datasets have been used for context only where >5 years old at submission; contemporary surveys (2022–2025) underpin assessment; documented in Technical Appendix 7.1 and Chapter 7: Ornithology .
			The aforementioned NatureScot guidance recommends that VPs are best located outside the survey area, so it is concerning that the VPs used to date appear to be within the site boundary. We also note that T10 and the majority of the 500m survey buffer (known as the Flight Activity Survey Area) are not covered by the viewsheds (Figure 6.3). Justification should be provided within the EIAR, and any limitations recognised.	According to NatureScot guidance (SNH, 2017) vantage points are “best located outside the survey area where possible”. In this instance efforts were made to locate vantage points outside the survey area but there were constraints caused by nest locations of Schedule 1 raptor species. Over 80% of the FASA has been covered by the viewsheds. More detail on flight activity survey methodology can be found in Technical Appendix 7.1 .
			We recommend that information is provided within the EIA report to demonstrate that the survey data are adequate, robust and accurate including:	All of this information has been included within Chapter 7: Ornithology , and Technical Appendix 7.1/7.2/7.3 .
			• Full information on the VP work undertaken, including dates, times and weather conditions.	
			• Maps showing VP locations that also denote viewsheds.	
			• Maps showing raptor nesting, roosting and foraging areas.	
			• Maps showing diver (and other wildfowl), gull and skua breeding records, sightings and commuting routes.	
			• Maps showing goose and swan winter roosting and foraging areas, and commuting routes.	
			• Worked example(s) of collision risk calculations.	
			• Provision of raw data in order for independent verification of collision risk calculations.	
			The EIA must consider all the components of the proposal including turbines, battery energy storage system, met masts, borrow pits, all proposed access roads (including the route on public roads to get the turbines on site), on site tracks, drainage, substation and temporary construction buildings/storage compounds. It should also assess the impacts of all phases of the project including site selection, design, construction, operation and maintenance and decommissioning.	All components and phases of the Proposed Development have been considered for the assessment
			Although the grid connection would be subject to a separate consenting process and the route and type is currently unknown (section 2.2.6), it must be recognised that this will be a required element if the wind farm is approved, and it is necessary to consider the likely location and route of such a connection as any overhead lines (or underground cables) are very likely to impact on qualifying species and habitats of the surrounding statutory and non-statutory protected sites, and the World Heritage Site as these are unlikely to be able to be avoided. We strongly recommend this be considered alongside the grid connection for the consented Golticlay wind farm so that any connection could be shared to reduce impacts.	Grid connection assumptions and likely corridors are outlined for cumulative/ incombination assessment, reported in relevant chapters.
			Disturbance, displacement, loss of suitable habitat (breeding, wintering and foraging) and collision risk should be assessed for all scoped in species, both during construction and operation. This should not only include impacts from the wind turbines but also new tracks and infrastructure as well as any existing road widening or upgrades.	These have all been included within the construction and operational effects sections of the ornithology assessment in Chapter 7: Ornithology

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			The potential barrier effects of this proposal should be addressed in the EIA for the proposed wind farm alone, and as part of the cumulative and in-combination assessment, particularly with regards to raptors, divers and other wildfowl. Section 6.3.5 of the Scoping Report overlooks this potential impact.	Barrier effects have been considered within Chapter 7: Ornithology .
			The fact that many SPA species migrate into and breed in the area, such as Common Scoter, Black and Red-Throated divers, their movements, especially at night, need to be taken account in the assessment, as these flights will not be recorded during surveys. It is notable that a Common Scoter female and large chick were recorded close to the site in 2024, and therefore, this species should be scoped into the assessment of impacts as in the UK, Common Scoter is an extremely rare species, critically endangered as a breeding species in the UK and in danger of extinction, and only 5 breeds at a few locations, including the Flow Country of Caithness and Sutherland, which supports approximately half of the UK population.	Black-throated diver and red-throated diver do not migrate at night. No migrating divers were recorded during surveys. The incidence of flights of divers during active migration over the Site is likely to be extremely low and therefore it is not believed there is a significant risk of collision to migrating divers. For these reasons and those given provided Chapter 7: Ornithology these species were scoped out of further assessment. Common scoter do migrate at night but all the available literature suggests this is done at altitudes well in excess of 200 m above ground level. Therefore, it is not believed there is a significant risk of collision to migrating common scoter. For these reasons and the lack of observations within the study area during baseline surveys this species was scoped out of further assessment.
			Tracks are known to increase the predation risk to ground-nesting birds in the Flow Country. The impacts of this, particularly in regard to SPA-qualifying species should be assessed.	Potential increased predation risk to groundnesting birds associated with tracks has been assessed and reduced through design and management measures; findings in Chapter 7: Ornithology .
			Impacts from displaced deer (trampling, browsing etc.) on the nearby designated sites and nature reserve areas, such as Munsary, will also need to be assessed.	Deer displacement impacts will be covered in the Deer Management Statement (Technical Appendix 6.8 , and Technical Appendix 6.6)
			In answer to the question 'Do consultees consider a UNESCO World Heritage Site assessment will be required in support of the EIA?', we strongly recommend this be undertaken.	A UNESCO WHS assessment has been undertaken using the Flow Country toolkit with OUV focus; reported in Technical Appendix 6.5 , and Chapter 6: Ecology .
			NPF4 Policy 7I) states that: "development proposals affecting a World Heritage Site or its setting will only be supported where their Outstanding Universal Value is protected and preserved". The Highland Council's Flow Country Candidate World Heritage Site Planning Position Statement (April 2023), states that, development within the WHS or within the zone of influence of the WHS, must be assessed utilising the UNESCO Impact Assessment Guidance Toolkit7 (section 5.14). Therefore, this should be used to determine impacts on the Outstanding Universal Values (OUV) of the site. However, it should be noted that in the case of World Heritage, it is understood that OUV is irreplaceable and cannot be offset.	
			We understand that at the time of writing the Scoping Report, there was no guidance relating to assessing the 'setting' of the Flow Country World Heritage Site. The current situation with regard to consideration of setting and landscape is likely to evolve prior to submission of this proposal as we are aware that such guidance is near publication. This should be considered when available. We note that an offshore wind farm was refused off the Jurassic Coast World Heritage Site8 due to impacts on the way the World Heritage Site would be experienced or enjoyed in its surroundings.	
			RSPB recommend that a cumulative/in-combination map is produced which shows the Caithness and Sutherlands SPA/SAC/Ramsar site and SSSIs to illustrate the extent of proposals in relation to the designated sites.	Cumulative/ incombination effects include relevant plans/projects; assessments in Chapters 6: Ecology and Chapter 7: Ornithology .
		Cumulative	The cumulative/in-combination effect of other relevant plans or projects, such as the Spittal to Loch Buidhe 400kV transmission line and existing pylon line that runs through the site boundary; and FLS's Caithness Land Management Plan. Overhead line grid connections such as the Connagill Cluster and those for the consented and operational Slickly, Limekiln, and Creag Riabhach wind farms must also be considered in the assessment.	Cumulative/ incombination effects include relevant plans/projects; assessments in Chapters 6: Ecology and Chapter 7: Ornithology .
		Soils and Peat	It is therefore concerning that section 3.2 (Topics to be Scoped Out) includes Geology and Soils (including peat); and confusingly, chapter 12 (Issues to be Scoped out of Impact Assessment) contains a section headed 'Geology and Soils Assessment Scoped In', which lists in section 12.1.15 technical information on geology and soils, including peat, that would be provided in the EIA Report such as an Outline Peat Management Plan and Construction Environmental Mitigation Plan. Since providing such detailed information is deemed necessary, peat should be included in the assessment. RSPB welcome that higher resolution peat probing surveys will be undertaken to ensure that all infrastructure locations have sufficient peat depth information to support relevant studies on peat instability, peat excavation and reuse, and carbon calculations.	Peat and soils have been fully assessed in Chapter 11: Geology and Soils . This is supported by relevant Technical Appendices 11.1, 11.2, 11.3 and 11.4 . Chapter 3: Design Evolution and Alternatives outlines the design iterations and a summary of mitigation is presented in Chapter 14: Schedule of Mitigation and Residual Effects .
			We welcome the preparation of an Outline Peat Management Plan (OPMP) that is informed by peat depth probing. We would also like to see information contained within the EIAR with regards to how oil leaks from operational turbines will be dealt with as we understand this is a common issue.	An Outline Peat Management Plan is provided (Technical Appendix 11.2), and turbine/transformer oil management and leak/spill response are detailed in Technical Appendix 2.1 .
		BNG	The Applicant should give early consideration to how positive effects for biodiversity would be delivered, and we welcome that some ideas have been discussed (section 2.2.10). The mitigation hierarchy should be followed, and any mitigation, compensation and enhancement measures clearly and separately identified within the EIA and other accompanying documents. In addition, it is currently RSPB Scotland's view that	Proposed biodiversity enhancement is outlined in Chapter 6: Ecology and Technical Appendix 6.6 .

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
			biodiversity enhancement measures should not be delivered on designated sites for nature, apart from in specific and exceptional instances, and enhancement measures must be truly additional.	As previously discussed, the Proposed Development will seek to explore and identify opportunities within the Site for peatland restoration, as outlined in Technical Appendix 6.6 .
			Without prejudice to any future position, we note that there seems to be potential for peatland restoration on the site and we would strongly recommend this is considered as part of the Applicant’s enhancement proposals. However, we consider that hedgerow and tree planting proposals may not be suitable for this site due to its sensitivity for species of open habitats. Any tree or hedge proposals would require further bird surveys and assessment.	
Scottish Fire and Rescue Service	No Response Received			
ScotWays	No Response Received			
Scottish Water	14/02/2025	Hydrology	Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:	Noted. Surface water will be managed onsite via SuDS and natural attenuation, with design and pollution prevention controls set out in Technical Appendix 2.1 and assessed in Chapter 10: Hydrology .
			DWPAs: A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.	Should any public water or wastewater connection be proposed, a PreDevelopment Enquiry (PDE) will be submitted via Scottish Water’s Customer Portal prior to any technical application; this process and any outcomes are documented in Chapter 10: Hydrology .
			Surface Water: For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at Development Operations The Bridge Buchanan Gate Business Park Cumbernauld Road Stepps Glasgow G33 6FB Development Operations Freephone Number - 0800 3890379 E-Mail - DevelopmentOperations@scottishwater.co.uk www.scottishwater.co.uk SW Internal General https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-andDevelopers/Connecting-to-Our-Network which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	
			Next Steps: All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals.	
Scottish Wildlife Trust	No Response Received			
Scottish Wild Land Group	No Response Received			
SSEN Transmission	28/03/2025	Infrastructure	Impact on proposed new 400kV overhead transmission line	Turbine T17 and T15 have been removed from the wind turbine array. T16 has been repositioned further east from the proposed SSE Spittal to Loch Buidhe to Beauly 400 kV OHL Connection. Further detail of the iterative design process is outlined within Chapter 3: Design Evolution and Alternatives .
			It appears proposed wind turbines 15,16 and 17 shown on Scoping Layout would be sited in a location which would be in direct conflict with our proposed new 400kV overhead transmission line (Beauly to Spittal, via Loch Buidhe), identified in NPF4 as one of six 'national' developments. To afford certainty on the conflict, we can advise the ECU we have already undertaken a series of public consultations on the proposal and are due to submit our S37 ELA 1989 to the ECU for their consideration later this year. Subsequently, we recommend the applicant gives due consideration to	
			how they may address these concerns in their EIA statement for their formal application.	For the existing 132 kV Loch Buidhe–Mybster OHL, the Applicant has maintained adequate separation, see Chapter 3: Design Evolution and Alternatives .
			Impact on existing critical national infrastructure	
			Given the proximity of the proposed wind turbines to our existing 132kV Loch Buidhe-Mybster overhead transmission line, it is likely these turbines would adversely impact the continued separation of the overhead line and therefore we recommend the applicant seek to address these concerns in their forthcoming EIA submission also.	

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
Visit Scotland	No Response Received			
Woodland Trust	No Response Received			
Community Councils				
Latherton, Lybster, and Clyth Community Council	No Response Received			
Wick Community Council	No Response Received			
Post Scoping Consultation				
Statutory Consultees				
The Highland Council (THC) – pre application meeting	Meeting held 15/05/2025	Turbine Layout	Inclusion of turbine T9 should be reviewed	Turbine T9 has been removed from the Proposed Development. Refer to Chapter 3: Design Evolution and Alternatives for details of the design evolution of the Proposed Development.
		Lighting Design	Placement of lighting should consider the Proposed Development and the Golticlay Wind Farm as a whole.	Details of the design of the lighting scheme are set out in Chapter 12: Aviation and in Technical Appendix 12.1
	Formal response 12/06/2025	Wild Land	The LVIA should make mention of wild land.	It was agreed with NatureScot (who attended the pre-application meeting) to include consideration of WLA36 in the LVIA, noting that this would consist of additional text in the chapter to highlight wild land qualities in the land west of the A9. In accordance with the requirements of NPF4, a detailed assessment of effects on wild land would not be required.
				The assessment of effects on SLA6: The Flow Country and Berriedale Coast included in Technical Appendix 4.6 acknowledges the presence of wild land qualities within the designation.
				An overview of effects on WLA36 are included in Chapter 4: Landscape, and Visual Impact .
	ZTV	A comparative ZTV should be included in the LVIA, that shows the visibility of the Proposed Development overlaid with visibility of the Golticlay Wind Farm.	Figures 4.3a-b present comparative hub and blade tip ZTVs respectively.	
	Blade Transfer Area	The LVIA needs to consider the temporary construction stage effects of the blade transfer area.	Chapter 4: Landscape, and Visual Impact Assessment , considers the effects of the blade transfer area.	
	400kV Overhead Line	Land on the eastern side of the A9 is also understood to be planned to accommodate the Spittle to Beauly 400kV overhead transmission line with the Section 37 anticipated to be lodged in late June 2025. The detail of this proposal and cumulative effect its potential development alongside this proposal therefore requires further detailed consideration.	SSEN Transmission’s proposed Spittle to Beauly 400kV is included as a cumulative scheme in relevant chapters. Figures 4.6a-c and 4.7d. and wireframe visualisations (refer to Figures 4.8a-y and Figures 4.9a-y include the pylons associated with site development.	
				Visualisations need to include transmission masts.
	BESS	Landscape mitigation needs to be considered in respect of the Battery Energy Storage System (‘BESS’).	The location of the proposed BESS was selected to reduce its visual prominence, this is outlined in Chapter 4: Landscape and Visual Impact Assessment .	
	Turbine Height	Turbines with max. blade tip height 200 m are likely to be unacceptable to THC	The max. blade tip height of the proposed turbines would be no greater than 180 m	
	Flow Country WHS	Advised that as the Site boundary is adjacent to the Flow Country World Heritage Site (WHS), THC Impact Assessment Toolkit Version 2 should be used to assess potential impacts on the WHS as a result of the Proposed Development. The assessment can either be a standalone document or an identifiable specific assessment as a component of a wider assessment i.e. EIA.	A full and detailed assessment of potential impacts, including cumulative impacts, on the Flow Country WHS is provided in this chapter and specifically in Technical Appendix 6.5 . This comprehensive assessment addresses all relevant impacts relating to criterion (ix)	
	BNG	In line with requirements of NPF4 Policy 3, the Applicant needs to demonstrate contribution towards biodiversity enhancement. THC recommended that THC Biodiversity Net Gain (BNG) metric is used to demonstrate 10% biodiversity enhancement. However, this is not being strictly enforced.	Details of proposed habitat restoration and enhancement measures are provided in Technical Appendix 6.6. and Technical Appendix 11.2 Scotland does not legally mandate BNG for developments, nor is there a formally adopted methodology for BNG assessments by a statutory body. The application of the DEFRA metric for calculating BNG is unsuitable given the upland habitat assemblage present at the Site To satisfy NPF4 Policy 3b, restoration and enhancement measures have been guided by relevant Scottish guidance, including NatureScot’s priority peatland guidance ¹⁸ , the Highland Local Biodiversity Action Plan ²⁰ , and best practice.	
		Peat	SEPA have raised specific concern with proposed siting of turbines T1 to the west and T10 to the east on areas of deep peat, stating that these locations and the scheme’s borrow pit locations would be unacceptable.	The infrastructure layout has been refined through an iterative design process, outlined in Chapter 3: Design Evolution and Alternatives , to further reduce effects on peatland, with additional residual effects/mitigation outlined in Chapter 11: Geology and Soils and summarised in Chapter 14: Schedule of Mitigation and Residual Effects .

Table 1.4.1: Consultation Register

Consultee	Date	Topic	Comment	Response
		Cultural Heritage	HES expressing strong concerns over the high level of impacts predicted to important sites in the immediate vicinity. HES requests that further pre-application consultation is undertaken with them given the potential for significant effects on assets within their remit that may warrant objection	Post-scoping consultation detailed below, in Chapter 5: Cultural Heritage , and design changes are detailed in Chapter 3: Design Evolution and Alternatives .
		Transport and Access	Further detail will be required in relation to a transport assessment, trunk road access, and construction traffic management; flood risk and drainage matters; impacts on ecology and the natural environment including nearby designated sites and biodiversity enhancement; and noise impacts amongst other considerations	Transport assessment detailed in Chapter 9: Traffic and Transport and associated technical appendices, Flood risk detailed in Chapter 10: Hydrology , impacts on ecology and the natural environment including nearby designated sites and biodiversity enhancement are detailed in Chapter 6: Ecology and Chapter 7: Ornithology and associated technical appendices. Noise impacts are detailed in Chapter 8: Noise and associated technical appendices.
		Policy	There are several other issues raised related to NPF4 requirements for the proposal to positively respond to the twin climate and nature crises while mitigating environmental impacts. The proposal must demonstrate that the mitigation hierarchy has been followed; that significant environmental impacts have been avoided in the first instance, if this is not possible, that effects are minimised and compensated for. You should note that the least favoured option is to offset impacts	Mitigation hierarchy has been followed, design mitigation outlined in Chapter 3: Design Evolution and Alternatives .
	30/06/2025	Viewpoints	Accepted the proposed viewpoints, and requested two further locations from points along the A9.	It was agreed to provide wireframe visualisations from the two additional viewpoints. Confirmed that the LVIA would consider sequential visual effects experienced by users of the A9
The Highland Council Environmental Health Department	21/08/25 - 09/09/25	BESS and Substation Noise:	N/A	Following analysis of the baseline noise data TNEI noted that an assessment approach considering absolute noise levels*, rather than a comparison to background sound levels, would be more appropriate. This was based on guidance presented in the Association of Noise Consultant's (ANC) BS 4142 Technical Note. TNEI suggested that a Rating Level limit of 35 dBA or +5 dB above the representative background sound level, whichever is greater, may be an appropriate target noise level to design the Proposed BESS and Substation to. * BS 4142 states; "Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night." This is expanded on in the Association of Noise Consultants' (ANC) BS 4142 Technical Note (see Section 3.2.1).
			In response, THC stated their preferred approach to be: <i>Where background levels are below 30dB LA90, the limit to be applied shall be 30dB or no more than 5dB above background whichever is lower'</i> and <i>'Where background levels are 30dB or higher, the limit to be applied shall not exceed the background level'</i> THC then went on to say that: <i>'based on the scoping layout, the separation distance between the BESS/Substation and the nearest NSR appears to be over 1km. If that is the case, I would advise that further noise assessment can be scoped out'</i> With regard to the 100 Hz limit, THC said: <i>'This condition can be waived where it can be demonstrated that the noise does not have a significant tonal element at 100Hz.'</i>	Based on predicted noise levels from the BESS and substation, TNEI and the Applicant agreed that a BS 4142 assessment should be undertaken for completeness. TNEI responded to THC proposing that a fixed noise limit of 30 dB(A) or background +5 dB, whichever is greater is used. In response to this, THC reiterated their preferred noise assessment criteria for BESS sites (See Technical Appendix 8.3)
Highland Council Archaeological Advisor (HCAA)	30/05/2025	Microsoft Teams call	A Teams call was held on the 30 th May 2025 to provide an update on the current surveys undertaken, review the chilled design, and discuss mitigation. The HCAA acknowledged the relatively low archaeological potential/limited potential to identify previously unrecorded assets due to the marginal nature of the Site as well as good cartographic evidence from the 19 th century onwards. It was agreed that mitigation would be discussed further once the site visit had been undertaken and the design freeze had been reached.	Potential impacts on unrecorded assets are assessed in Section 5.6 of Chapter 5: Cultural Heritage , while suggested mitigation is detailed in Section 5.10 of the same chapter.
	06/10/2025	Microsoft Teams call	CAA was shown the final design on a Teams call, and acknowledged that the potential for physical impacts on non-designated historic environment assets was limited as most assets are avoided. HCAA noted that the polygon marking the Golticlay Township Head Dyke (MHG20228) may not be accurate and remains might not survive after results of the walkover survey were shared. As such, no mitigation would be required here if no remains were identified on the alignment of the final track. HCAA noted that a watching brief should be undertaken in areas of the Site that had the potential to contain previously unrecorded heritage assets, although acknowledged that the archaeological potential was likely to be low.	An overview of the Golticlay Township Head Dyke (MHG20228) is provided in the archaeological site visit section of Chapter 5: Cultural Heritage , and the potential for impact on the asset is assessed in Section 5.9 of Chapter 5: Cultural Heritage . Suggested mitigation is detailed in Section 5.10 of Chapter 5: Cultural Heritage . This covers areas highlighted for an archaeological watching brief. A review of the peat probing work across the Site was also undertaken (see Chapter 11: Geology and Soils for full details of peat probing) and this noted that all deeper peat deposits would be avoided meaning there is limited potential for palae-environmental work/collection of samples during construction.

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
Historic Environment Scotland (HES)	09/04/2025	Email Exchange	Updated visualisations on a revised design were provided to HES via email for comment.	No further comment.
	25/04/2025	Impacts upon Cultural Heritage assets setting Site Meeting with HES	HES provided a formal response acknowledging views to the NNW across the Flow Country, however, they highlighted that they felt there were also key views along the NNW/SSE axis towards to SSE and the ridgeline in this area. They also noted that currently this area was relatively undeveloped moorland with a single telecommunications mast, and the Proposed Development would see it 'dominated by an industrial wind farm development'.	Analysis of the Achkinloch Chambered Cairn (SM419) and the Achkinloch Stone Setting (SM420), as well as their setting has been undertaken by Dr John Barber a renowned technical expert and specialist in the field of prehistoric monumental architecture (see Technical Appendix 5.3). This has noted that the Achkinloch Stone Setting does not appear to have been aligned on any specific features on the ridge line to the south, and it also did not identify any features on the ridge or in the landscape to the south that may have been a focus for the alignment of the Achkinloch Stone Setting (SM420). It is acknowledged that the ridgeline to the south-south-east of the two scheduled monuments forms a component of their setting, and it was therefore considered as part of the design evolution in order to reduce impacts on their setting. This included relocating the proposed turbines behind the ridgeline, refer to Chapter 3: Design Evolution and Alternatives .
			HES also acknowledged the possible enhancement/improvement of visitor access and experience at the Achkinloch cairn and stone setting, but stated that the focus of mitigation should be to 'avoid significant impacts before turning to reducing impacts and only then considering compensation or offsetting mitigation such as the suggested enhancement measures'.	
	12/05/2025	Visualisations provision	Visualisations based on the revised layout were provided to HES. This iteration of the design was based on the comments received from HES on the 25th April 2025.	No further comment
	19/05/2025	Email Exchange	HES acknowledged the updated visualisations and confirmed they would review and provide feedback.	No further comment
	06/06/2025	Formal Acknowledgement	Formal written response from HES acknowledging the changes that have been made to the design to help reduce the potential for impacts on the setting of heritage assets. However, HES indicated that they still felt that the Proposed Development would result in a significant adverse impact and that they would 'likely object to the redesigned proposals'.	No further comment
	09/06/2025	Call with HES	A call with HES confirmed that they still had concerns about the design and the potential for significant impacts on the setting of the Achkinloch assets.	Further details relating to the design, and assumed setting of the Achkinloch Chambered Cairn (SM419) and the Achkinloch Stone Setting (SM420), supplied by email on the 1 st July 2025
	13/06/2025	Formal written response	Formal written response from HES acknowledging the changes that have been made to the design, but noted they still had concerns over the design and the potential for impacts on the setting of the Achkinloch assets .	Visualisations requested have been produced as part of the cultural heritage assessment and are presented in Volume 3b. (Figures 5.10, 5.11, 5.13-5.15) Layout 2 (Design Chill 1 Layout) was further revised based on the HES feedback to achieve Layout 3 (Design Chill 2 Layout). This included removing and moving a number of turbines, as well as reducing the height of turbines, to limit the appearance of the Proposed Development beyond the ridge to the south-southeast. A full description of changes can be found in Chapter 3: Design Evolution and Alternatives .
			HES also requested a number of visualisations.	
	01/07/2025	Email to HES	N/A	Email to HES requesting a site visit to better understand key views from the Achkinloch Stone Setting (SM420), as well as to better understand their setting and how Layout 2 might be changed to reduce impacts.
	11/07/2025	Email from HES	Email from HES confirming that a site visit would be useful to further discuss the potential impacts on the setting of the Achkinloch Chambered Cairn (SM419) and Achkinloch Stone Setting (SM420).	Site meeting arranged for the 30 th July, with Layout 2 (Design Chill 1 Layout) discussed on site, with further changes made after the site visit to reach Layout 3 (Design Chill 2 Layout). A full description of changes can be found in Chapter 3: Design Evolution and Alternatives
	30/07/2025	Site Meeting with HES	A site meeting was held at the Achkinloch Stone Setting (SM420) to discuss the potential for the Proposed Development to result in significant impacts on the setting of the asset. HES noted that they considered the full 360° sweep as important to the setting of the Stone Setting, although reiterated that they felt views to the ridge to the SSE were significant. They also noted that while there was an existing telecommunications mast to the south, and an Overhead Line (OHL) to the west/northwest, the size of the new turbines would be out of character with the landscape.	It was agreed that, following the meeting HES would consider the further design changes made to achieve Layout 3 (Design Chill 2 Layout) and respond formally in writing. These changes included reducing the height of a number of turbines, as well as removing two turbines. Full details of the change made to reach Layout 3 (Design Chill 2 Layout) are detailed in Chapter 3: Design Evolution and Alternatives .
	01/08/2025	Information provision	N/A	Information that had been shared with HES on site, including more up to date visualisations, were provided by email.
	15/08/2025	Formal written response from HES	Formal written response from HES confirming that while they are pleased to see changes to the design, they still feel the Proposed Development has the potential to result in a significant impact on the setting of the Achkinloch Chambered Cairn (SM419) and Achkinloch Stone Setting (SM420). HES also requested an additional visualisation from the 'northwest end of the monument, in a central position'.	The design of the Layout 3 (Design Chill 2 Layout) was changed to achieve Layout 4 (Design Freeze Layout). This involved further reducing the height of two turbines, removing two turbines (Turbine 2 and Turbine 8 in Layout 3), and slightly repositioning Turbine T1 in Layout 3. These changes resulted in a relatively clear view of the section of ridge visible to the south when looking out of the open end of the 'horseshoe' of the Achkinloch Stone Setting, as it ensured all turbines are behind the main ridge line. This change also reduced the lateral extent and appearance of the Proposed Development. The combination of all the above changes reduced the percentage of the '360° view'

Table 1.4.1: Consultation Register				
Consultee	Date	Topic	Comment	Response
				that will be altered by the Proposed Development, therefore reducing impacts on the setting of the designated asset. Further details of these design changes are included in Chapter 3: Design Evolution and Alternatives . This final design was taken through to assessment in Chapter 5: Cultural Heritage .
Non-Statutory Consultees				
Highlands and Islands Airports Ltd.	28/10/25	Aviation	The Applicant forwarded Sagentia’s IFP Assessment report for Wick Airport (Technical Appendix 12.3) to HIAL. The report determined that the Proposed Development would not adversely impact Wick Airport’s IFPs. At the time of writing, HIAL’s response is awaited.	The Sagentia IFP assessment report can be found at Technical Appendix 12.3 . Further details on this receptor are contained in Chapter 12: Aviation .
SSEN Transmission	16/08/25	SSEN proposed 400 kV OHL. Suggestion from the Applicant that SSEN underground existing 132 kV OHL, and utilise its corridor for 400 kV OHL.	Email from SSEN Following on from our meeting and your request that SSENT investigate the possibility of undergrounding the 132kV OHL and utilising its corridor for our new proposed 400kV OHL, we have undertaken further investigations on this request. The alignment for the 400kV was developed having regard for the various constraints and challenges in the area, including; the wind farm proposal (as per the scoping report), peatland, designated sites, residential properties, the A9 trunk road as well as the terrain and scheduled monuments/sites. We have assessed options for undergrounding the 132kV and options for re-routing the 400kV OHL on the basis of the 132kV line being undergrounded in this area. Even with the undergrounding of the 132kV line, which would in itself be problematic through this section due to constraints and challenges (some of which are noted above), the constraints in this location prevent a feasible alternative alignment being developed to the west of the current alignment. For clarity, the key constraints preventing an alignment further to the west are the clearance distances from residential properties, the peatland, the designated site and the A9 trunk road. There are of course further challenges which add to/exacerbate the constraints (the terrain/topography, consenting issues, construction issues) and thus rendering any alternative alignment unfeasible. Therefore, we will not be in a position to locate the 400kV OHL any further west. We welcome further discussion on miscrositing of the three new turbines that have been proposed. As it stands due the project timelines we will need to progress with Ground Investigation surveys on the current alignment	Given that the SSE Spittal to Loch Buidhe to Beauly 400 kV OHL Connection is a proposed asset (and not an existing asset) on land that RWE has had under option for development for wind energy for some time, it is considered that the Applicant has made reasonable efforts to find a balanced solution by incorporating a topple distance buffer into the design. Equally it is the case that SSEN still have adequate opportunity to design an OHL to co-exist with the Proposed Development based on this topple distance buffer.