Appendix 12F
Summary of Consultation

October 2024
Document number: 62281580-WSPE-RP-OY-00007_P03

Appendix 12F
Summary of Consultation

Introduction

Table 0F-1 provides a summary of the Geology, Hydrology and Hydrogeology issues regarding the Proposed Development that have been raised by key consultees and a reference to the responses provided in **EIA Report Chapter 12: Geology, Hydrology and Hydrogeology** and elsewhere. The consultee responses were included in the Environmental Impact Assessment (EIA) Scoping Opinions issued by the Energy Consents Unit (ECU) in September 2020 and further were received in September 2022, these being presented in full in **EIA Report Chapter 2: EIA Approach, Appendix 2A: Scoping Opinion**.

Concerns subsequently raised by SEPA at and following a meeting with the Applicant and WSP on the 27th October 2023 with respect to the occasional encroachment of watercourse buffers at certain turbine locations are acknowledged and addressed in the last row of **Table 12F-1**.

Table 0F-1 Summary of issues raised during consultation regarding Geology, Hydrology and Hydrogeology

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
General	SEPA (July 2020, with additions in July 2022)	Consideration should be given to the following key issues that must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection, the information outlined below and in the attached appendix must be submitted in support of the application: • Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications. • Map and assessment of impacts upon GWDTEs and buffers. • Map and assessment of impacts upon groundwater abstractions and buffers. • Peat depth survey and table detailing re-use proposals. • Map and table detailing forest removal. • Map and site layout of borrow pits. • Schedule of mitigation including pollution prevention measures. • Borrow Pit Site Management Plan of pollution prevention measures. • Maps of proposed waste water and surface water drainage layouts (July 2022). • Map of proposed water abstractions including details of the proposed operating regime. • Decommissioning statement. **The engineering works relevant to the water environment and the water receptors considered in the assessment and their buffers are shown on Figures 12.5a and 12.5b, and the assessment of impacts is presented in Section 12.10. Peat depth / restoration use, forest removal and borrow pit proposals are presented in Chapter 6 and Appendix 4A, though the borrow pit search areas are also shown in Figures 12.1, 12.4a, 12.4b, 12.5a and 12.5. Pollution prevention measures are discussed within Section 12.8, whilst the Borrow Pit Site Management Plan and Decommissioning Statement would be provided under condition of consent.**	12.8 and 12.10 **Figures 12.1, 12.4a, 12.4b, 12.5a** and **12.5b**
	SEPA (July, 2020, with	The following Regulatory requirements are considered relevant:	12.8

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref

	modifications in July, 2022)	• Authorisation may be required under CAR to carry out engineering works within the water environment (July 2022).
		• A CAR construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:
		  • is more than 4 hectares;
		  • is in excess of 5km; or
		  • includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25˚ (July 2020).
		• Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012 (July 2022).
		
		SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75) provides further details. Site design may be affected by pollution prevention requirements and hence SEPA strongly encourages the Applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.
		
		Below these thresholds the Applicant will need to comply with CAR GBR 10 which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.
		
		Specific water environmental measures embedded into the development proposals are considered within Section 12.8. This includes CAR watercourse crossing and construction site licence authorisations.	

	SEPA (July 2020 and July 2022)	All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. The maps must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. **All maps and proposed infrastructure are shown on figures at an appropriate scale.**	**Figures 12.1, 12.4a, 12.4b, 12.5a** and **12.5b**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
Flood risk	SEPA (July 2020)	Provided watercourse crossings are designed to accommodate the 1 in 200-year event and other infrastructure is located well away from watercourses SEPA does not foresee from current information a need for detailed information on flood risk. Please note that surface water drainage is a matter for ABC to consider in its capacity as the Flood Risk Management Authority. Consideration should be given by the Applicant to Appendix 2 of SEPA's Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then an FRA must be submitted in support of the planning application. SEPA's technical flood risk guidance for stakeholders outlines the information it requires to be submitted as part of a FRA. Please also refer to CAR Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities. **SEPA flood risk maps have been used to identify different flood risk zones as reported in Section 12.5. Other than watercourse crossings, no permanent infrastructure is proposed for areas with a high-medium likelihood of flooding and as indicated in Section 12.8, best practice would be adopted in the sizing and construction of watercourse crossings. On this basis, flood risk has been 'scoped out' from further assessment (Section 12.7).**	12.5, 12.7 and 12.8
Classified watercourses	SEPA (July 2020)	SEPA states that three classified watercourses drain the site area, namely the Douglas Water (ID: 10226) which is at 'poor status', The Lecann Water (ID: 10227) which is at 'moderate status' and Abhainn a Bhealaich (ID: 10272) which is at 'moderate status'. Works on-site will need to ensure that none of these watercourses are subject to any further potential downgrade in status. Current land management practices are not considered to be a contributing factor to the status of any of these watercourses. **The Douglas Water is now noted to be of moderate overall status (Section 12.5). Impact assessment for the three classified watercourses draining the Development Site is presented in Section 12.10.**	12.5 and 12.10

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
Abstractions	SEPA (July 2020)	Based on the information provided at this stage it seems unlikely that any development will take place within 250m of a groundwater supply source and if this is the case then it would be helpful if the ES provides evidence to confirm this. **Data provided by SEPA and ABC have been reviewed and it can be confirmed that no development is proposed to be located within 250m of a groundwater supply source (Figures 12.5a and 12.5b).**	12.7 and 12.10
	SEPA (July 2020 and July 2022)	Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include the following: • A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure, the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. • If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. Consideration should be given by the Applicant to Guidance on Assessing the Impacts of Development Proposals on GWDTEs for further advice on the minimum information SEPA requires to be submitted. **Mapping of groundwater abstractions and GWDTEs is presented in Figures 12.4a and 12.4b, and those 'scoped in' (Section 12.7) for further assessment are located with appropriate buffers (Figures 12.5a and 12.5b), with details of micro-siting provisions supplied within Section 12.8. No development is proposed to be located within 250m of a groundwater supply source, but a risk assessment has been undertaken for a number of the GWDTEs.**	12.8 and 12.10 **Figures 12.4a, 12.4b, 12.5a** and **12.5b**
DWPAs / abstractions	SWa (July 2020)	SWa advises that a review of its records indicates that the proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. SWa abstractions are	12.5, 12.7, 12.8 and 12.10

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		designated as DWPAs under Article 7 of the WFD. Douglas Water supplies Inveraray Water Treatment Works (WTW) and it is important that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect SWa, it should be notified without delay using the Customer Helpline number. Consideration should be given by the Applicant to a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Site-specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within the catchments page of the SWa website at www.scottishwater.co.uk/slm. Additional communications were held with SWa to clarify the location of the Douglas Water abstraction. During this consultation details of this and a further abstraction point on the Allt Garbh were provided. **The Douglas Water abstraction is described within the baseline (Section 12.5) and is identified as a receptor for assessment (Section 12.7). Mitigation is discussed in Section 12.8 and the assessment is presented in Section 12.10.**	
Peat	SEPA (July 2020 and July 2022)	It must be demonstrated how the layout has been designed to minimise disturbance of peat and outline the preventative / mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches or the storage and re-use of excavated peat. A detailed map of peat depths and possibly a full PMP may be required. **Peat management is considered in Chapter 6 – Renewable Energy, Carbon Balance and Peat. The protection of the water environment has been considered in the design of the Proposed Development (Section 12.8). The assessment of hydrological changes relevant to GWDTEs and, by association, peat is presented within Section 12.10.**	**Chapter 6 – Renewable Energy , Carbon Balance and Peat** 12.8 and 12.10
	SNH (August 2020)	Whilst a large part of the Development Site is currently used for commercial forestry, there is a linear open ridgeline that runs along the southern boundary, and the majority of this open area is classified as Class 2 Peatland which is described as nationally-important carbon-rich soils, deep	12.8 and 12.10 **Chapter 6 – Renewable**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		peat and priority peatland habitat which is likely to contain areas of potentially high conservation value and restoration potential. From aerial imagery it appears as though some areas of the peatland habitat has been degraded and therefore SNH encourages the Applicant to consider including peatland restoration measures as part of any Habitat Management Plan for the Proposal. SNH refers the Applicant to its 'general scoping and pre-application advice' note (2020) which provides advice on other considerations which should be taken into account in the EIA Report. **Peat management is considered in Chapter 6 – Renewable Energy, Carbon Balance and Peat. The protection of the water environment has been considered in the design of the Proposed Development (Section 12.8). The assessment of hydrological changes relevant to GWDTEs and, by association, peat is undertaken within Section 12.10.**	**Energy Policy, Carbon Balance and Peat** 12.8 and 12.10
	RSPB (July 2020)	RSPB advises that the layout of the wind farm avoids open habitats including lochans and planted deep peat. Being predominantly coniferous forestry, the SNH Peatland map shows the site predominantly as Class 5 which is already impacted due to forestry. However, RSPB notes that the central ridge of open ground running from the south-west to the north-east (in its 2022 response) and the area surrounding the site (in its 2020 response) is Class 2 peat, representing nationally important carbon-rich soils, deep peat and priority peatland habitat with potentially high conservation value and restoration potential. A detailed peat mapping exercise is therefore required. The design process should ensure peat impacts are avoided and should promote opportunities for restoration and positive management. The surrounding area is Class 2 nationally important carbon-rich soils, deep peat and priority habitat with potentially high conservation value and restoration potential. It's unclear how much of this the access track / grid connection will cross. **Peat management is considered in Chapter 6 – Renewable Energy, Carbon Balance and Peat. The protection of the water environment has been considered in the design of the Proposed Development (Section 12.8) The assessment of hydrological changes relevant to GWDTEs and, by association, peat is undertaken within Section 12.10.**	**Chapter 6 – Renewable Energy, Carbon Balance and Peat** 12.8 and 12.10

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
Engineering activities	SEPA (July 2020 and July 2022)	The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing: • All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. • A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. • Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. SEPA advise that if water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided. Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide. --- **The engineering works relevant to the water environment and the water receptors considered in the assessment and their buffers are shown on Figures 12.5a and 12.5b, with mitigation discussed in Section 12.8 and the assessment of impacts presented in Section 12.10. Detailed drainage plans would be provided under condition of consent.**	12.8 and 12.10 **Figure 12.5a** and **12.5b**
GWDTEs	SEPA (July 2020 and July 2022)	SEPA states that GWDTEs are protected under the WFD and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission: a) A map demonstrating that all GWDTEs are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.	12.8 and 12.10 **Figures 12.4a, 12.4b, 12.5a** and **12.5b**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA is likely to seek conditions securing appropriate mitigation for all GWDTE affected. The Applicant should refer to LUPS-GU31 (Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems) for further advice and the minimum information that SEPA requires to be submitted. **Mapping of GWDTEs is presented in Figures 12.4a** and **12.4b, and those 'scoped in' for further assessment (Section 12.7) are located with appropriate buffers in Figures 12.5a and 12.5b, with details of mitigation supplied within Section 12.8. A risk assessment has been required for certain of the GWDTEs and has been used to inform the impact assessment presented in Section 12.10.**	
	ABC (August 2020)	In regard to habitats and vegetation, the Local Biodiversity Officer notes that the Applicant proposes an extended Phase 1 Habitat Survey will be completed within the Developable area (30km^2). A National Vegetation Classification (NVC) survey will be undertaken on areas of open ground within the developable area (and within 250m where accessible). The survey will include a GWDTE assessment. In regard to GWDTEs the ABC's Local Biodiversity Officer asks that deep peat is mapped so as to avoid in the construction of the development proposal. Where shallow peat overlays e.g. suitable borrow pit material, access route etc. the Local Biodiversity Officer asks that the Applicant drafts a PMP to include soil, peat slip and soil erosion. The ABC's Local Biodiversity Officer advises that the Construction Environment Management Plan (CEMP) is overseen by an Ecological Clerk of Works (ECoW). In regard to ecological studies, the ABC's Local Biodiversity Officer notes that none have yet been undertaken, but that the Applicant plans to carry out an ecological impact assessment including assessment of the potential loss or damage of valued habitats such as deep peat, GWDTE's, watercourses associated with on-site access tracks etc. **Mapping of GWDTEs is presented in Figures 12.4a** and **12.4b, and those 'scoped in' for further assessment (Section 12.7) are located with appropriate buffers, as shown in Figures 12.5a** and **12.5b, with details of mitigation supplied within Section 12.8. A risk**	12.8 and 12.10 **Figures 12.4a, 12.4b, 12.5a** and **12.5b** **Chapter 10 – Ecology**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		assessment has been required for certain of the GWDTEs and has been used to inform the impact assessment presented in Section 12.10. Other elements requested are mainly covered in Chapter 10 – Ecology, including reference to a NVC survey and an extended Phase 1 habitat survey.	
Borrow pits	SEPA (July 2020 and July 2022)	Consideration should be given by the Applicant to the Scottish Planning Policy stating (Paragraph 243) that *"Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place."* The submission must provide sufficient information to address this policy statement. In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 Controlling the Environmental Effects of Surface Mineral Workings (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit: a) A map showing the location, size, depths and dimensions. b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site-specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock. d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table. e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works. f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.	12.8 **Figures 12.1, 12.4a, 12.4b, 12.5a** and **12.5b** **Chapter 6 – Renewable Energy , Carbon Balance and Peat**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily. h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO2. i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding. **Borrow pit search areas are shown on Figures 12.1, 12.4a, 12.4b, 12.5a and 12.5b, with borrow pit engineering considered elsewhere in EIA Report (Chapter 4 - Description of the Proposed Development). The detailed layout of proposed mitigation, drainage design and abstractions if required would be supplied within associated site works documentation that are assumed to be conditioned, such as the CEMP (Section 12.8) and a Borrow Pit Site Management Plan. The management of peat and reinstatement of peat is considered within Chapter 6 – Renewable Energy, Carbon Balance and Peat.**	
Pollution prevention and environmental management	SEPA (July 2020 and July 2022)	SEPA notes that one of its key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of the ECoW, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. The Applicant should refer to the GPPs.	12.8

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		Details of proposed mitigation and pollution prevention measures would be supplied within associated site works documentation that is expected to be conditioned, such as the CEMP. The range of appropriate mitigation that would be incorporated into a CEMP are described within Section 12.8.	
Decommissioning	SEPA (July 2020 and July 2022)	Consideration should be given by the Applicant to proposals for life extension, repowering and / or decommissioning must demonstrate accordance with SEPA Guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long-term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed. **Decommissioning is considered elsewhere in the EIA Report (Chapter 4 - Description of the Proposed Development). Water impacts during decommissioning are likely to be similar to those during the construction phase, though of a lesser magnitude as below ground infrastructure and tracks would be left in situ, and decommissioning effects are therefore 'scoped out' (Section 12.7).**	12.7
Water quality monitoring	MSS (July 2020)	Consideration should be given by the Applicant to the MSS recommendation that the Applicant consults its generic scoping guidelines https://www2.gov.scot/Topics/marine/SalmonTroutCoarse/Freshwater/Research/onshoreren) and its EIA checklist and draws up appropriate site specific mitigation measures including a robust integrated water quality and fish population monitoring programme as a means of trying to minimise any impacts on the water quality and fish populations within and downstream of the Development Site. Further information on survey / monitoring requirements can be found on the web site. MSS advises that the Applicant considers the potential cumulative impact on the water quality and fish populations as a result of other developments (e.g. wind farms, fish farms, mining and forestry operations) which have hydrological connectivity with the present proposal. Consideration should be given by the developer to consider the potential impact on the water quality and aquatic fauna as a result of the proposed felling and include the measurement of nitrates and phosphates in a hydrochemical monitoring programme.	12.10 - 12.12 **Chapter 10 - Ecology**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		A water quality monitoring plan (WQMP) is proposed in Section 12.12, and it is assumed that this would be conditioned. Consideration of the potential impact of the Proposed Development on the water quality is given within Section 12.10, with cumulative impacts considered in Section 12.11. The monitoring of, and the potential impacts of the Proposed Development on, aquatic fauna is considered in Chapter 10 – Ecology.	
Decommissioning	ABC (August 2020)	It is noted from the Scoping Report that there is no proposal to limit the lifetime of the proposed development. Therefore, the assessment of all technical areas considers the effects of the operational phase of the Proposed Development in perpetuity. Furthermore, should decommissioning of any of the Proposed Development be required it is considered that any effects would be less than those resulting from construction of the Proposed Development, and as such this potential for decommissioning has been scoped out of further assessment. ABC does not agree with this approach. As the wind turbine technology itself does not have a perpetual lifespan, it is considered that the effects of decommissioning should not be scoped out of the assessment.	12.7
		Decommissioning is considered elsewhere in the EIA Report (Chapter 4 - Description of the Proposed Development). Water impacts during decommissioning are likely to be similar to those during the construction phase, though of a lesser magnitude as below ground infrastructure and tracks will be left in situ, and decommissioning effects are therefore 'scoped out' (Section 12.7).	
Built environment	ABC (August 2020)	The EIA Report should identify the location of all built elements, which should be sited to avoid habitats of importance, wetlands, areas of deep peat and blanket bog, watercourses and abstractions, in order that areas of particular vulnerability to damage from development, or which have higher pollution sensitivity, may be protected from unnecessary impacts associated with the development. The assessment should address the construction, operational and decommissioning phases of the development.	12.7 and 12.10 **Figures 12.5a** and **12.5b**
		The engineering works relevant to the water environment and the water receptors considered in the assessment and their buffers are shown on Figures 12.5a and 12.5b, and the assessment of impacts is presented in Section 12.10. Water impacts during	

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		decommissioning are likely to be similar to those during the construction phase, though of a lesser magnitude as below ground infrastructure and tracks will be left in situ, and it is therefore proposed that decommissioning effects are 'scoped out' (Section 12.7).	
PWSs	ABC (August 2020)	The ABC's Environmental Protection Officer has advised that the Proposed Development is in an area where residential properties are served by PWSs which is recognised by the Scoping Report (SR). The Applicant should identify all properties served by a PWS to determine the source of those supplies that may be affected (e.g. surface supply, borehole etc.) and, where appropriate, should outline the proposed measures to avoid causing contamination during the construction and operational phases. Consideration should be given by the Applicant as to where a water supply is to be provided at the construction site or any facilities in use during the operational phase (for drinking water, toilets etc.) details of the source of this supply and any proposed treatment should be outlined (the supply will be required to meet the standard of the Water Intended for Human Consumption (Private Supplies) (Scotland) Regulations 2017). **The PWSs in the Study Area are identified in Section 12.5 and Figures 12.4a and 12.4b, and a subset are retained for consideration in the water impact assessment (Section 12.10 and Figures 12.5a and 12.5b).**	12.5 and 12.10 **Figures 12.4a, 12.4b, 12.5a** and **12.5b**
Migratory salmonids	Argyll District Salmon Fishery Board (ADSFB) (July 2020)	ADSFB is constituted to protect and improve fisheries for Atlantic salmon and sea trout while Argyll Fisheries Trust (AFT) also has a management role in conserving resident freshwater fish populations. ADSFB is advised by AFT that the Proposed Development has potential to affect the headwaters of two watercourses that support Atlantic salmon, namely the Leacann Water flowing into Loch Fyne and the Abhainn a' Bhealaich flowing into Loch Awe, the largest and most economically important fishery in the region. ADSFB also urges the Applicant to identify suitable monitoring of fish and habitat quality, including spawning and nursery habitat and potential for stream crossings to hinder movement of fish. Given the vulnerability of Atlantic salmon populations, ADSFB also urge the developer to identify important salmon habitat that may be affected by any water quality issues downstream of the proposed site and identify suitable monitoring regimes.	12.10 and 12.12 **Chapter 10 - Ecology**

Issue raised	Consultee(s)	Response and how considered in this Chapter	ES Section Ref
		In its July 2022 scoping response ADSFB specifically identify potential for loss of habitat connectivity through inappropriate stream crossings and fine sediment entering watercourses at construction sites as priorities for the location of monitoring sites for the pre-development stages to ensure that key sites are monitored during and after the Proposed Development. **Consideration of the potential impact of the Proposed Development on the water quality on the Abhainn a' Bhealaich, Leacann Water and other watercourses in the Study Area is given within Section 12.10, and a WQMP is proposed in Section 12.12. The monitoring of, and the potential impacts of the Proposed Development on, aquatic fauna is considered in Chapter 10 – Ecology.**	
Various	SEPA (October 2023)	SEPA raised a number of water-related issues during and subsequent to a meeting with WSP and the Applicant on the 27th October 2023. These issues included the following: a) Confirmation that patches of M6 have not been missed and therefore not included in GWDTE assessment; b) A map showing the GWDTEs that have not been 'scoped out' is provided, together with a summary for those that have; and c) Justification supported by detailed assessment is required for the suspected encroachment of watercourse buffers at a number of turbine locations, namely T2, T4, T6, T7, T9, T11, T13, T21 and T22. **M6 has been extensively referenced in the GWDTE Appendix 12A and is well represented in the 28 'screened-in' GWDTEs taken forward into detailed assessment.** **All GWDTEs are shown on Figures 12.4a** and **12.4b, whilst the 'scoped in' ones alone are shown on Figure 12.5a** and **12.5b. Descriptions of all GWDTEs are provided in Annex A of Appendix 12A.** **In Section 12.8 proposed encroachments on the 50m watercourse buffers are acknowledged at T2, T4, T6, T9 and T13 but embedded mitigation is proposed to address these, including turbine micro-siting, site drainage and careful reinstatement of ground. The buffers would not be intercepted at other turbine locations SEPA has identified (T7, T11, T21 and T22).**	**Appendix 12A: Groundwater Dependent Terrestrial Ecosystems Assessment** **Figures 12.4a, 12.4b, 12.5a and 12.5b** 12.8