

Appendix 1A: Response to Consultee Comments

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
Argyll and Bute Council	Thursday, December 12, 2024	No Objection	Hydrology	In its interim response and summary comments dated 12th December 2024, ABC states no objections subject to conditions. It observes that all turbines and also the substation are located outside fluvial flood limits and notes all turbines would be at least 50m from the nearest watercourse. That some of the crane hardstanding and laydown areas would be within the 50m buffer is considered acceptable by ABC.	T3 and T20 are no longer being proposed and other turbines would be relocated further away from the watercourses.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	Hydrology	ABC also notes that the proposed watercourse crossings would be sized to convey the 1 in 200 year design flow water level with freeboard allowance. It considers this good practice and it is recommended that this is made a planning condition, such that any new or upgraded crossings should not reduce the existing capacity of the channel and ideally should convey the 1 in 200 year plus climate change flow. Consideration should be given to options such as bottomless culverts, and SEPA WAT-SG-25 should be followed.	The Applicant would adopt best practice and accepts a planning condition to satisfy the requirements of SEPA on crossing design as noted. This would also take account of Argyll and Bute Council (ABC)'s position regarding channel capacity planning condition, and the design already references SEPA WAT-SG-25 guidance.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	Hydrology	ABC observes that no drainage design plans had been supplied, and it recommended that drainage is designed in accordance with CIRIA C753, and that its surface water drainage and Sustainable Drainage Systems (SuDS) design and implementation checklists are addressed. Post-development surface water runoff should also not exceed the pre-development runoff. A planning condition is recommended to this effect.	Reference is already made in the EIA Report to CIRIA C753 (e.g. EIA Report Appendix 12B: Technical Guidance) and the need to ensure runoff does not exceed pre-development rates (EIA Report Chapter 12: Geology, Hydrology and Hydrogeology, Section 12.7 Scope of the Assessment). The Applicant is happy to accept a planning condition to this effect and to adopt ABC's best practice drainage checklists.
Argyll and Bute Council	Wednesday, July 9, 2025	Comments on Assessment	LVIA	<i>Landscape Effects:</i> <i>The introduction of additional wind farm development into a part of the backdrop to the loch which is currently undeveloped would diminish the sense of naturalness and seclusion that can be experienced. I consider that significant adverse effects would occur on the character of the middle section of Loch Awe, extending broadly between the promontory of Kames Bay to the north of Dalavich to around Liever Island. The LVIA does not address effects on the character of Loch Awe.</i> <i>Visible aviation lighting would introduce lighting to the dark skies of the sparsely settled Loch Awe area diminishing its remote and little developed character.</i>	Loch Awe is not identified and described as a landscape character type within the <i>Argyll and Bute Landscape Wind Energy Capacity Study</i> (2017). Nor is it identified as a Landscape Character Type within the NatureScot LCTs (2019). No assessment of Loch Awe has been made in the LVIA's for either the An Càrr Dubh Wind Farm application or the consented Blarghour Variation and no associated requests for such an assessment have been made in any corresponding consultation requests from NS. As noted previously, no reference is made in NS guidance on landscape character assessment of large water bodies or lochs. Therefore, the revised LVIA includes landscape assessment of the LCT's which include the shoreline of Loch Awe and views across the Loch. No significant landscape character effects are identified in respect of these receptors (<i>North Loch Awe Craggy Upland</i> or <i>Rocky Mosaic</i> LCTs). Views from within water bodies and across lochs from shorelines are assessed as recreational receptors and included within the visual assessment. Visual effects (as opposed to landscape character effects) from Loch Awe are assessed as Significant in Viewpoint 2 (3.4km distance) and on the settled fringes at Dalavich (Figure 4-14 (a-h) Viewpoint 4 Dalavich) (6km distance) and encompass views from the north of the 'middle section' of Loch Awe (Figures 4-12 (a-d) to 4-15 (a-g), Viewpoints 2-5). Views from the settlement of Ford at the south-western extent of the loch (9.4km distance) are assessed as not significant. This assessment is supported by further wireline analysis, as noted previously. The visibility of aviation warning lights is acknowledged in the revised night-time assessment in Appendix 4A.
Argyll and Bute Council	Wednesday, July 9, 2025	Comments on Assessment	LVIA	<i>I consider that the proposed development would not have significant adverse effects on the special qualities of nationally important landscapes including the Loch Lomond and Trossachs National Park and the Knapdale National Scenic Area. I also consider that effects on the character and special qualities of the Local Landscape Areas covering the head of Loch Awe and the Loch Fyne area would not be significant.</i>	Noted, the same conclusion is made in the revised LVIA for the Revised Development.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
Argyll and Bute Council	Wednesday, July 9, 2025	Comments on Assessment	LVIA	<i>Visual Effects:</i> <i>Significant adverse effects on views would principally occur from:</i> <i>The west side of Loch Awe, from the minor road (C29/C30), sections of which also form the Caledonia Way cycle route where occasional open views occur and also from recreational routes particularly concentrated in the Kilmaha area and on the shores of Loch Awe. This is illustrated by Viewpoint 3 at Kilmaha, although similar and more open views will occur from the newly created Forestry Land Scotland (FLS) footpath and viewing area at the start of the car park for the promoted Tall Trees Trail and also along sections of the trail itself.</i> <i>The settlement of Dalavich where this proposal would be seen principally from the shores of Loch Awe together with the operational An Suidhe wind farm with the proposed 200m high turbines (and particularly the closer Turbines 9, 13 and 14) being significantly more dominant than the 83m high turbines within this older scheme (see Viewpoint 4).</i> <i>From the waters of Loch Awe, experienced by people using watercraft and where, if the long length of the loch is traversed, sequential cumulative effects would occur with the operational wind farms of Carraig Gheal and An Suidhe. The accolade of longest freshwater loch in Scotland has led to a number of challenges for enthusiasts including the Loch Awe Challenge for 'paddlers' of all sorts and the Three Lakes Challenge (paddling the longest lakes in England, Wales and Scotland). The loch is also well-used by fishermen.</i> <i>From the A886 where elevated views are possible over Loch Fyne at Leanach (Viewpoint 8) and also from the waters of Loch Fyne in the Newton to Strachur area where the proposal would be seen at distances of 6-7km</i>	- It is agreed that significant visual effects, as indicated by viewpoint 3 (Figure 4-13 (a-g) Viewpoint 3 Kilmaha), would occur at other locations on the west side of Loch Awe. However, much of this area is also forested / wooded and views would tend to be screened or partly screened by intervening vegetation. - This is illustrated in Figure 4-14 (a-h) Viewpoint 4 Dalavich. - This observation is noted and considered as part of the revised LVIA in Section 4.3. - The visual effects of the Revised Development from Viewpoint 8 (Figure 4-16 (a-g) Viewpoint 8 Leanach) and the Newton to Strachur area would be significantly reduced in comparison to the Proposed Development.
Argyll and Bute Council	Wednesday, July 9, 2025	Comments on Assessment	LVIA	<i>Cumulative Effects:</i> <i>The combination of the Proposed Development with the consented Blarghour wind farm (and the operational An Suidhe wind farm which lies between them) would substantially increase the extent of wind turbines seen on the skyline of uplands which enclose the eastern side of Loch Awe. The An Suidhe, consented Blarghour and proposed An Carr Dubh wind farms would be seen simultaneously and in close sequential views affecting the bottom two-thirds of the Loch Awe area (EIA-R Figure 8.15). The combined effect of all four wind farms would result in a dominant effect on the character of the middle part of Loch Awe and on views as a near continuous band of wind turbines would be seen on the eastern skyline of craggy hills which contain Loch Awe, giving an impression of a landscape dominated by wind energy development (commonly termed a 'wind farm landscape').</i>	Significant cumulative visual effects resulting from these wind farm developments on the views from Loch Awe and associated recreational receptors is confirmed in the Revised LVIA. Whilst significant visual effects are noted from some locations along the western shores of Loch Awe (Viewpoints 2-5), there are clear 'breaks' in the succession of visible wind farm development on the skyline to the far side of Loch Awe as shown on the wirelines. These 'breaks' would become greater with the decommissioning of the An Suidhe Wind Farm. Moving sequentially along the western side of Loch Awe, there is also a variable magnitude of change between each viewpoint such that different wind farms would become more or less visible on the skyline, when viewed from different locations along the western side of Loch Awe.
Argyll and Bute Council	Wednesday, July 9, 2025	Comments on Assessment	LVIA	<i>The Proposed Development would also contribute to combined significant adverse cumulative effects on views from Dun na Cuaiche at Inveraray Castle Garden and Designed Landscape (GDL) (Viewpoint 10) where an arc of development of large turbines would be visible on the hills enclosing Loch Fyne and forming a backdrop to the GDL.</i>	This viewpoint is illustrated by Figure 4-18 (a-g) Viewpoint 10 Dun na Cuaiche. Although visible, the Revised Development would not be significantly visible from this location and would not make a significant contribution to visual effects, which would largely result from other wind farm developments and the overhead transmission line that would appear more prominently in this view.
Argyll and Bute Council	Wednesday, July 9, 2025	Recommendations / Design Amendment	LVIA	Removal of Turbines 9, 13 and 14 to reduce the prominence of the development in views from the west side of Loch Awe represented by Viewpoints 2, 3, 4 and 5 (but also when seen from recreational routes on the western side of Loch Awe where no representative visualisations have been produced in the EIA-R). The aim of this mitigation measure would be to more strongly associate the proposed wind farm with a lower and less prominent part of the skyline and to also minimise current and potential future cumulative landscape and visual effects. The removal of Turbines 9 and 14 would additionally improve views of the proposal from the lower part of Loch Awe in the vicinity of Ford (as represented by Viewpoint 11).	These recommendations are noted. The design of the Revised Development has been updated and turbines T3, T5, T7, T11 and T20 have been removed. This has significantly reduced the landscape and visual effects from Loch Fyne, including a number of significant effects previously assessed in the EIA Report. Turbines T9, T13 and T14 have not been removed, reduced in height or relocated and so there would be no change to the effects of the Revised Development on the views from the Loch Awe area.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	LVIA Ecology	The Applicant should provide a detailed plan of where broadleaved planting will be undertaken on the margins of forestry and should also confirm the figure of 13.9ha of riparian/broadleaved planting they propose to undertake (stated in paragraph 4.4.1 of the Outline Habitat Management Plan Appendix 10.H) and how this relates to the 1.8ha increase in mixed broadleaves identified in Table 4A.11 of the EIA-R Forestry Assessment.	Areas of broadleaf planting included as part of the HMP proposals are not included within the Wind Farm Forest Plan figure or calculations. These are covered separately under the FEI Report Appendix 6D. Any changes to the overall broadleaf composition detailed within the calculations are concerning felling and restructuring due to the development layout.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	LVIA Ecology	The proposed development would result in a net loss of 91.2 hectares of woodland. It is recommended that compensatory planting should be undertaken within Argyll and Bute and the	Note that the Revised Development would result in the net loss of 93.9 ha of woodland. The Applicant is committed to providing

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
				extent, location and composition of this should be agreed with the Council in addition to Scottish Forestry	appropriate compensatory planting to mitigate this and is willing to accept a planning condition to this effect. The extent, location, and composition of such planting will be agreed with ABC and Scottish Forestry. .
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	Aviation	While acknowledging the Clachaig Glen II reporter's finding on conditions requiring periodic review of aviation lighting, the large number of wind farm proposals across Argyll and Bute requiring aviation lighting is a major concern and a condition requiring future implementation of an Aircraft Detection Lighting System should be put in place in order to reduce the cumulative landscape and visual effects of such lighting.	No Aircraft Detection Lighting System is currently proposed as part of the Revised Development. See FEI Report Appendix 8B: Lighting Strategy for the lighting strategy agreed with CAA.
Argyll and Bute Council	Wednesday, July 9, 2025	Further Information	Noise	The desktop review and site survey conclude that, in general, good practice has been adopted by the applicant, with a few minor issues identified. The most significant of these issues is: - The omission to consider the contribution of two operational turbines at Blarghour Farm to the cumulative assessment - Confirmation of the correction of predicted LAeq to give LA90 by subtracting 2 dB	The two operational turbines at Blarghour Farm were considered within the 2024 EIA Report (see Section 7.4 of Chapter 7: Noise) . As mentioned in the chapter, as the turbines were less than 50kW and at a considerable distance from the Development Site, it was considered they would not contribute to the overall turbine noise levels. This remains the same for the Revised Development.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	Transport	The applicant has shown only one site access, the access connects directly to the A83 Tarbet - Campbeltown Trunk Road. Roads & Infrastructure Services are concerned the applicant may also use the B840 and the UC10 to access this site. 1. The B840 East Lochaweside Road shall not be used for construction traffic / access, without written permission from Roads & Infrastructure Services. 2. The UC 10 Auchindrain - Brenichoillie Road shall not be used for construction traffic / access, without written permission from Roads & Infrastructure Services.	Agreed.
Argyll and Bute Council	Wednesday, July 9, 2025	Condition	Ecology Peat	- Continue discussions with NatureScot regarding peat, bats, otters, ornithological interests and the outline Habitat Management Plan and adhere to proposed mitigation measures - Continue discussions with RSPA regarding ornithological interests and adhere to proposed mitigation measures - Continue discussions with SEPA regarding peat and adhere to proposed mitigation measures - Continue discussions with Scottish Forestry regarding forestry - Updated surveys for otter and ornithological features are required - Submission of SPP to include bats - Submission of BPP Provide further mitigation measures with regards bats due to the high risk of collision	The following reports of this FEI respond to these comments: Appendix 5B: Bird Protection Plan Appendix 6A: Otter Survey Baseline Report Appendix 6D: Outline Peat Management Plan
Argyll District Salmon Fishery Board	Thursday, January 9, 2025	Condition	Hydrology	ADSFB expresses concern that the Proposed Development could have some significant impact on migratory salmonid fish habitats downstream of the Development Site, namely the Abhainn a' Bhealaich tributary to Loch Awe and also some tributaries of the Douglas Water. It therefore requested that, in the event of the proposed wind farm being granted planning permission, monitoring of water quality, macroinvertebrates and fish in both catchments should be undertaken.	The magnitude of change of the Proposed Development on the watercourses had been assessed in the EIA Report as medium for the Abhainn a' Bhealaich and low for the Douglas Water (EIA Report Chapter 12: Geology, Hydrology and Hydrogeology, Section 12.10 Assessment of Effects), with the level of effects on these two watercourses considered minor adverse and Negligible (not significant) respectively. With the removal of T5 and T7 and their associated tracks, and also of the tracks to T11 and T20, in the Abhainn a' Bhealaich headwaters, and of T3 and its track in the Douglas Water headwaters, these changes and effects would be reduced further still (Section 3.6). Nevertheless, to the Applicant would accept a planning condition to undertake water quality monitoring to Scottish Government guidelines, pre-construction, during construction and for a defined period post-construction.
BT Group	Tuesday, November 26, 2024	No Objection	Telecoms	We have studied the proposed windfarm development with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.	Noted.
Defence Infrastructure Organisation (DIO)	Tuesday, December 17, 2024	No Objection	Defence	Subject to the conditions detailed in Appendix A, the MOD has no objection to the proposed development	The Applicant accepts the conditions detailed in Appendix A of DIO's response.
Glasgow Airport	Monday, January 20, 2025	No Objection	Aviation	The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We, therefore, have no objection to this proposal.	Noted.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
Glasgow Prestwick Airport	Monday, January 20, 2025	No Objection	Aviation	We continue to have no comment or valid objection to make to the proposal	Noted.
Highlands and Islands Airports Limited	Wednesday, January 22, 2025	No Objection	Airspace	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted.
Historic Environment Scotland	Wednesday, February 19, 2025	Objection	Historic Environment	An Dun form (SM3522): HES require a wireframe visualisation taken from this site looking towards the proposed development before we can determine whether the setting of the monument would be significantly affected by the proposals.	See FEI Report Chapter 8: Historic Environment
Historic Environment Scotland	Wednesday, February 19, 2025	Objection	Historic Environment	HES note it is not clear from the information in section 9.7.8 why these assets have been excluded from the assessment. This is particularly the case for the cup marked rock sites and the scheduled monuments located in and around Ford. We believe that these assets should be scoped in for further assessment and that visualisations should be provided from these monuments looking towards the proposed development, which include: · Tom Nan Clach, cup & ring marked rock 560m ENE of Hazelbank - SM3426 (HA15). · Ford, cupmarked rock, 130m NNW of Forestry Houses - SM5709 (HA65). · Auchinellan, cupmarked rocks 1150m N of - SM5516 (HA67). · Auchinellan, cupmarked rocks and enclosure, 1250m N of - SM5669 (HA68). · Stroneskar, cupmarked rock and cairns W of - SM5710 (HA69). · Cairmbaan, prehistoric rock art 230m N & 215m NNE of Cairnbaan Hotel - SM13211 (HA74). · Ford, stone setting 270m SW of Ford Hotel – SM202 (HA66). · Creagantairbh Beag, standing stone at S end of Loch Ederline – SM194 (HA70).	See FEI Report Chapter 8: Historic Environment
Historic Environment Scotland	Wednesday, February 19, 2025	Objection	Historic Environment	HES note the following monuments are scoped out but no justification is provided for this: “Cairns and standing stones within the southern and western extents of Kilmartin Glen: Carnasserie Castle standing stones (HA75) and cairn (HA76), Dunamuck cairns (HA72, HA73), Lady’s Seat cairn (HA79) and Dun mac Samhainn (HA77)” (p.11). The rationale for scoping these assets out of detailed assessment needs to be clarified.	See FEI Report Chapter 8: Historic Environment
Ironside Farrar	Friday, April 11, 2025	No Objection	Peat Landslide	Although much of the PLHRA is sound, one or two key elements are considered to be insufficiently robust to support the PLHRA conclusions and minor revisions are required; areas for attention will be advised in the review findings and may be progressed by the developer through either an appendix to the original submission or by clarification letter.	The Applicant has provided a letter response addressed to the ECU and Ironside Farrar. This is presented in FEI Report Appendix 7C: Eredine WF Stage 1 Checking Response .
JRC	Thursday, December 5, 2024	No Objection	Telecoms	This proposal is cleared - subject to 50m Micrositing - with respect to radio link infrastructure operated by the local energy networks. JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements. In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal. In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted. It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.	Noted.
National Air Traffic Services (NATS)	Friday, November 29, 2024	No Objection	Aviation	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted.
NatureScot	Tuesday, February 18, 2025	No Objection & Design amendment	Ornithology	While the proposed impacts on ornithological receptors do not raise issues of national interest, we do have a number of concerns regarding the Proposal, namely: - There is a high risk of disturbance and displacement to red-throated divers during both the construction and operational phases of the development. Should the Proposal go ahead as outlined, the Applicant may be at risk of committing an offence under the Wildlife and Countryside Act 1981 (as amended). We would advise that turbines 1, 3, 5, 7, 11, 16 and 19 are relocated or removed, to help reduce disturbance, displacement and collision impacts.	We acknowledge the no-objection response from NatureScot. In response to the concerns raised, Turbines 3, 5, 7 and 11 have been removed as part of the Revised Development. Disturbance, displacement and collision impacts have been re-assessed based on this, and effects are considered to be of low magnitude (Not Significant) during both the construction and the operational phase.
NatureScot	Wednesday, February 19, 2025	Further Information	Ornithology	The white-tailed eagle survey data is old, and there may be material changes in species distribution at this site since the survey work was completed. We would advise that the Applicant carries out another year of survey work for white-tailed eagle and completes a cumulative assessment at a national level.	Another year of survey work has been carried out, as detailed in FEI Report Chapter 5: Ornithology . A cumulative assessment at national level is not considered feasible or necessary. This is partly due to the lack of national population-level productivity data for white-tailed eagle. NatureScot has in recent times criticised applicants for “over-reliance” on Scottish Raptor Monitoring Scheme data, but has itself stopped population size surveys for this species. It is unclear how cumulative assessment at national level is meant to proceed if NatureScot do not accept the existing data as valid. The UK also lacks sufficiently precise annual survival rates for white-tailed eagle for this level of modelling. Moreover, NatureScot would also need to provide advice to set an

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
					appropriate threshold for national cumulative impacts on white-tailed eagle. Further comment is provided in FEI Report Confidential Appendix 5D .
NatureScot	Thursday, February 20, 2025	Condition	Ornithology	A detailed bird protection plan will be required, which should include mitigation for impacts on black grouse, red-throated diver and black-throated diver during both construction and operational phases of the development, as well as potential impacts from the outline habitat management plan. Please see Annex 2 for our detailed ornithological assessment [which also includes a minor point about osprey collision estimates].	A bird protection plan (BPP) covering the suggested mitigation is provided as FEI Report Appendix 5B .
NatureScot	Tuesday, February 18, 2025	Further Information & Condition	Ecology	OTTER - A number of potential otter holts and couches have been found within the red line boundary of the site. We would advise that the Applicant does further work to confirm their usage, including camera trapping or further field surveys. Given that the location of otter holts and couches can change, we would also advise that a pre-construction survey is carried out 2-3 months prior to construction. Any works within 30m of a confirmed otter shelter or 200m from a confirmed breeding site will require an otter licence. Please note that the latter distance can be reduced to 100m if local circumstances such as dense coverage or topographical screening apply. A Species Protection Plan will also be required. Further information on our licencing process is on our website.	Update otter surveys have been undertaken in April/May to confirm usage of identified potential resting sites (see FEI Report Appendix 6A). There will be a commitment for further pre-construction surveys to be undertaken 2-3 months prior to construction, likely subject to a planning condition. The requirement for a Species Protection Plan is also acknowledged, also likely subject to a planning condition.
NatureScot	Tuesday, February 18, 2025	Further Information	Ecology	BATS - The bat surveys were carried out in 2020 and would now be considered invalid. The Applicant has stated that new bat surveys were not carried out due to there being no substantive land use changes at the site, aside from some active forestry work. It would be beneficial to have further details as to the location and nature of this forestry work in order for us to determine whether new surveys are required. Additionally, no mitigation measures for bats have been proposed by the Applicant. The recorded level of activity may be sufficient to indicate that there is potential for bat mortalities at this site and therefore we would advise that feathering of the turbine blades below cut in speed is implemented at this site.	An update bat survey baseline was undertaken in 2024. The baseline will be provided and a review against the earlier baseline will be undertaken to establish any differences between the levels of activity between the surveys. Mitigation measures have been included, specifically including proposed feathering of turbines at identified turbines where activity levels indicate potential risk of mortality. See FEI Report Appendix 6B .
NatureScot	Tuesday, February 18, 2025	No Objection, though concerns raised	LVIA	We consider that the nature and scale of the Proposal at this location are such that it cannot be accommodated without significant adverse landscape and visual effects including cumulative effects (in combination with the consented Blarghour/Variation and application An Carr Dubh wind farms). This would include significant adverse effects on areas of the underlying Craggy Uplands, nearby landscapes, a wide geographical extent of the open waters of Loch Awe and its settled fringes, eastern areas of the open waters of Loch Fyne and from some lower and higher elevations on the eastern side of the loch. We anticipate that significant adverse individual and cumulative day time effects would extend into significant adverse night-time effects on the Craggy Uplands and on Loch Awe and it's settled fringes.	See the responses below, addressing each of the points raised by NatureScot.
NatureScot	Tuesday, February 18, 2025	Design amendment	LVIA	We would encourage the Applicant to reconsider the design of the Proposal, particularly where the Proposal would have significant adverse effects on Loch Awe and Loch Fyne. This is likely to require a reduction in the vertical height, horizontal extent, and the removal/relocation of turbines 9, 11 and 20, which may reduce the severity of some of the effects.	The design of the Revised Development has been updated with the removal of T3, T5, T7, T11 and T20. This has significantly reduced the landscape and visual effects from Loch Fyne including a number of significant effects previously assessed in the EIA Report. Turbine T9 has not been removed, reduced in height or relocated, as it is considered that this removal would have a lesser landscape and visual effect than the removal of turbines noted.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	While we agree with the conclusions of the LVIA that the introduction of the Proposal would result in significant adverse landscape effects on the south-eastern unit of AGC 7 Craggy Upland and AGC 6 a – Loch Fyne Upland Forest Moor Mosaic9, we consider that, given the vertical height and horizontal extent of the proposed turbines, these effects would extend notably beyond the approximate 2km reported across a wider geographical extent.	The revised LVIA has been reconsidered and further clarification is provided in Section 4.3, paragraphs 4.3.10 to 4.3.17.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	AGC 7 Craggy Upland - The Proposal extends the presence and influence of wind farm development immediately south-west of operational An Suidhe, with the proposed turbines being notably larger. We consider that significant adverse landscape effects would cover a minimum of 6km to the north and north-west extending into the second north-western unit of AGC 7 Craggy Upland on the western side of Loch Awe (as shown by Viewpoints 3, Kilmaha and 4. Dalavich), a minimum of 4km within the open upland moorlands to the west and south-west, north of operational A'Chruach and approximately 2km south and east either up to or close to the LCT boundary. We disagree that there would be no effect on AGC 7 Craggy Upland north of An Suidhe (north-east of the proposed development) despite its existing influence given that the proposed turbines are at least 120m taller than this operational wind farm and that significant adverse landscape effects would extend to a minimum of 4km directly north of the Proposal.	It is considered that the Revised Development would not significantly affect AGC 7 beyond approximately 2km. There would be no significant effects to the north-east beyond approximately 2km, as explained in the revised LVIA, due to the presence of the existing An Suidhe Wind Farm which already has an influence on this part of the LCT. Any potential landscape effects, beyond approximately 2km resulting from the Revised Development would not be significant and would overlap with this development and its effects on the existing LCT. Beyond An Suidhe Wind Farm, ZTV coverage is also fragmented and overlapping with forestry. Additionally, a reduced number of turbines would be theoretically visible and turbine bases would also be partly screened by landform reducing their apparent height. For these reasons significant effects could not extend to 6km in this direction. Significant landscape character effects would not extend to the “second north-western unit of AGC 7 Craggy Upland on the

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
					<i>western side of Loch Awe (as shown by Viewpoints 3. Kilmaha and 4. Dalavich)”. Although there is greater ZTV coverage, this overlaps with extensive forestry which is an established, strong characteristic of this part of the landscape. The existing baseline illustrates that while part of the forestry would be felled at any one time, the character of a mature forest remains overall. Viewpoints 3 and 4 are representative of particular points or small areas within this landscape where there are open views. As such, they are not representative of the landscape character overall (although they are representative of significant visual effects likely to be experienced by people at these specific locations).</i> Considering the landscape effects to the west and south-west, again the ZTV peters out and becomes fragmented to the west. Beyond 1-2km to the south-east, significant effects would be limited by the recently constructed Inveraray to Crossaig 275kV Overhead Line that crosses this landscape, limiting any significant effects beyond it in this direction.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	AGC 6a – Loch Fyne Upland Forest Moor Mosaic - The Proposal extends the presence and influence of wind farm development and electricity infrastructure south and west of operational An Suidhe (within AGC 7 Craggy Upland) and north of the Inveraray to Crossaig overhead line. We consider that significant adverse effects on this LCT would affect a wider geographical extent than reported in the LVIA, extending to cover a minimum of 3km south of the Proposal within the western unit of the LCT, and extending beyond 5km into the northern parts of the eastern unit on the eastern side of Loch Fyne near Strathlachlan Forest.	The Revised Development would not significantly affect AGC 6a beyond approximately 2km for the following reasons. The Revised Development has further reduced the influence of wind farm development on this unit through the removal of five turbines at the south-eastern edge of the wind farm (T3, T5, T7, T11, and T20). The nearest remaining turbine (T19) would be located approximately 1.6km from the boundary of the <i>Loch Fyne Upland Forest Moor Mosaic LCT</i> (western unit). Within 2km of T19, the <i>Loch Fyne Upland Forest Moor Mosaic LCT</i> is heavily forested and there would be no significant effects within the LCT. This is because of the location of T19, in combination with the other remaining turbines, which would be set back from the eastern edge of the upland plateau where they would be mostly screened by intervening landform. This is illustrated in the ZTV (Figures 4-3 and 4-4) which shows very limited or patchy theoretical visibility within <i>Loch Fyne Upland Forest Moor Mosaic LCT</i> within 2km of the turbines. The limited visibility extends to over 3km to the south of the turbines. There would be no significant landscape effects on the <i>Loch Fyne Upland Forest Moor Mosaic LCT</i> eastern unit. This is because the Revised Development would be seen in a different part of the landscape, separated by intervening landscape features, including Loch Fyne and two units of <i>Rocky Mosaic LCT</i>. As such, it is impossible for the Revised Development to have any direct impact on the physical features of the <i>Loch Fyne Upland Forest Moor Mosaic LCT</i> eastern unit. Indirect effects would also be limited by the screening effects of extensive forestry within the LCT. Where there would be visibility of the proposed turbines from open areas of the LCT, it would be perceived as a visual effect, related to the visibility of the Revised Development present within a separate upland character area. The Revised Development is also reduced in scale and magnitude by the removal of five proposed turbines when viewed from this LCT.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	Loch Awe - Accounting for the site location and the vertical height and horizontal extent of the proposed turbines we consider that there will be a significant adverse effect experienced from the open waters of Loch Awe where the proposed turbines, hubs and blades will be seen in eastward looking views against the skyline, therefore extending the presence and influence of wind farm development south-west of operational An Suidhe. The greatest effects will be experienced within 5km (as shown by Viewpoint 2. Loch Awe Waters). However, given the extent of theoretical visibility shown, we consider that significant adverse effects on Loch Awe and its scenic settled fringes would extend beyond 10km across south-western parts of the loch.	Visual effects on views, including scenic views and visual amenity experienced from the shores and open water of Loch Awe are assessed (in both the EIA Report and this FEI Report) as Significant in Viewpoint 2 (3.4km distance) and on the settled fringes at Dalavich (Viewpoint 4) (6km distance). Views from the settlement of Ford at the south-western extent of the loch (9.4km distance) are assessed as not significant. This is because of the screening effects of intervening landform and forestry, and the limited horizontal and vertical extent of the visible turbines, as well as the presence of other human development in the view.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
					Further wireline and site analysis has been undertaken to further test the potential for significant visual effects on views from Loch Awe, including its scenic settled fringes within 10km. This analysis aligns with the conclusions of the above viewpoint analysis and visual assessment that significant visual effects would be contained within approximately 7.5km (and not 10km), as indicated by Viewpoint 5, overlooking Loch Awe.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	Loch Fyne - In westward looking views from the open waters of Loch Fyne and from some lower and higher elevations on the eastern side of the loch the Proposal would either introduce visibility of large scale wind farm development or notably extend the influence of wind farm development and electricity infrastructure west of operational An Suidhe and north of the Inveraray to Crossaig overhead line. Where the proposed turbines, hubs and blades would be seen against the skyline the proposed development would have an adverse effect on the perceived scale of the underlying Craggy Uplands and small scale settlements on the western side of the Loch Fyne including Furnace and Inverary as shown by loch side Viewpoints 8. Leanach and 20. Ardkinglas Woodland Garden. We consider that some significant adverse effects on Loch Fyne would extend beyond 15km.	The Revised Development has removed five turbines (T3, T5, T7, T11 and T20) and this has significantly reduced the level of effect on the views and visual effects at Loch Fyne. From Viewpoint 8 the Revised Development would appear 'set back' from the upland plateau edge, relating to the interior of the upland setting. Mostly blades would be visible from this viewpoint with three hubs visible behind forestry and no upper towers visible. The scale of the turbines appears to fit well with the undulating upland skyline. The removal of turbines, where towers were visible, has reduced the scale differences in relation to small scale settlements. The Revised Development would also reduce the horizontal spread of turbines in views from the north of Loch Fyne (Viewpoint 20). It is not agreed that significant effects would extend to or beyond 15km and the design modifications of the Revised Development would significantly reduce the visual effects on Loch Fyne. Viewpoints encompassing Loch Fyne include viewpoints 6-10, 12-14, 18, 20 and 21, none of which would be significantly affected by the Revised Development, as noted in Table 4-1.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	For visual receptors on the eastern side of Loch Fyne represented by Viewpoints 9. Strachur, 18. Hell's Glen Road (B839) near A815, 20. Ardkinglas Woodland Garden, we consider that effects will be higher than those reported, accounting for the vertical height and horizontal extent of the proposed turbines and the high sensitivity of receptors at Strachur and Ardkinglas.	Figure 4-17 (a-e) Viewpoint 9 Strachur - The receptor at this location has been assessed as of High sensitivity and the Revised Development would reduce the magnitude of change to Very Low. The effects would not be significant. Figure 4-22 (a-e) Viewpoint 18 Hell's Glen Road (B839) – From this viewpoint, the Revised Development would reduce the horizontal extent of the development in comparison with the Proposed Development and magnitude of change would be Low and not significant. Figure 4-23 (a-e) Viewpoint 20 Ardkinglas Woodland Garden – The receptor at this location has been assessed as of High sensitivity and although the Revised Development would reduce the horizontal extent of the development, the magnitude would remain Low and the effect not significant.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	From some lower elevations on Loch Fyne the Proposal will introduce a large vertical man-made focal point seen against the skyline formed by the underlying craggy uplands. From some higher elevations on the eastern side of Loch Fyne, including from a section of the A815 east of Ardno, the Proposal will be seen to extend the presence and influence of wind farm development west of operational An Suidhe.	The Revised Development has removed five turbines (T3, T5, T7, T11 and T20) and this has significantly reduced the level of effect on the views and visual effects at Loch Fyne, including those at a lower elevation as illustrated by the comparative wirelines in Viewpoints 6, 9 and 14 (Figure 4.24a-z). Views from higher elevations east of Ardno are represented by Viewpoint 18. As noted above, the visual effects would not be significant. An Suidhe would be decommissioned in approximately 7 years, limiting the period when both this wind farm and the Revised Development would be visible.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	The size of the proposed turbines will adversely affect the perceived scale of the underlying landscape and the small-scale settlement on the western side of Loch Fyne, including Inveraray and Furnace. Where visible from higher elevations the Proposal will become the dominant feature in westward looking views given the vertical height and horizontal extent of the Proposal.	Inveraray is visible from Viewpoints 13, 14, 18 and 20. None of these viewpoints are assessed as significant, as a result of either the Proposed or the Revised Development. Therefore, the turbines in the Revised Development do not represent "dominant" features'. This is particularly the case for Viewpoints 13 and 14 where the settlement of Inveraray would be closer to the viewpoints and more visible.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
					Furnace is visible in Figure 4-16 (a-g) Viewpoint 8 Leanach and the view would not be significantly affected, due to the removal of five turbines in the Revised Development. Consequently, the turbines in the Revised Development do not represent “dominant” features’ and would not affect the perceived scale of settlement which includes a large quarry and associated industrial buildings.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	We consider that, while some SLQs of the LLTNP and Knapdale NSA will be adversely affected by the Proposal, these effects are unlikely to be significant. However, it should be noted that the proposed turbines will be notably larger than other operational and consented wind farms in this area. This will be particularly apparent from elevated positions such as that represented by Viewpoints 19. Beinn an Lochain and 24. Beinn Ìme within the LTTNP, and Viewpoint 22: Cruach Mor Dunardry within the Knapdale NSA.	As agreed with NS none of the SLQs and related viewpoints would be significantly affected. It is also incorrect to suggest that the “ <i>proposed turbines will be notably larger than other operational and consented wind farms in this area</i> ” as this is not illustrated in the wirelines for each of these viewpoints for either the Proposed or the Revised Development, due to the effect of perspective.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	Cumulative Effects - While we agree with some of the significant adverse cumulative effects reported, we consider that the geographical area of effects will be wider, affecting a wide geographical extent for landscape receptors and visual receptors. This will include the majority of the south-eastern unit of AGC 7 Craggy Upland, extending into the north-western unit AGC 1 Steep Ridgeland the western unit of AGC 6a Loch Fyne Upland Forest Moor Mosaic, extending into the southern unit, Loch Awe and Loch Fyne and will extend beyond 15 km for visual receptors. The introduction of the Proposal to either LVIA cumulative Scenarios 1 or 2 will extend the presence of wind farm development south and west of operational An Suidhe. The introduction of the proposed development to the existing and potential emerging pattern of wind farm development within the south-eastern unit of AGC 7 Craggy Upland south of Loch Awe will notably alter this landscape to Craggy Upland with wind farms with potential effects extending across Loch Awe into the north-western unit of AG7.	The NS description of “<i>significant adverse cumulative effects</i>” appears to consider a combined cumulative effect, accounting for all existing, and consented wind farms and wind farm applications and accounting for landscape character and visual receptors (within 15km) which are not affected or not significantly affected by the Revised Development. As noted previously the Revised Development would have a more limited significant effect on the <i>AGC 7 Craggy Upland and part of the AGC 6a Loch Fyne Upland Forest Moor Mosaic</i>. Visual effects would be contained generally within approximately 7.5km with a further isolated significant effect illustrated at Viewpoint 15 Beinn Bhan (Figure 4-21 (a-e)) at approximately 11.8km distance. When considering the combined cumulative effects (see Figure 4-7) there are ‘gaps’ and breaks between separate wind farms and clusters of development, rather than a continuous development and these gaps or breaks partly mitigate and reduce the magnitude of these effects. Equally, the levels of cumulative effect between multiple schemes vary in magnitude and level of effect. It is therefore not considered that the effects would be as extensive or universally significant as suggested.
NatureScot	Tuesday, February 18, 2025	Observation	LVIA	Night-time Effects - We largely agree with some of the effects reported for visible aviation lighting on visual receptors but consider that the geographical extent of effects will be wider than reported. We disagree that there would be no significant adverse effects on landscape receptors. We anticipate that either individually or cumulatively under both cumulative Scenarios 1 and 2 that the potential for significant day time effects on AGC 7 Craggy Upland would extend into the night, given the existing role that the site currently plays in helping form the backdrop to the eastern side of Loch Awe. Particularly where the proposed aviation lights will be seen in eastward looking views from the settled fringes of Loch Awe above the enclosing ridge formed in part by the site of the Proposal.	The Revised Development includes a revised Lighting Strategy which has been reconsidered and assessed to accord with NS’s recent <i>Guidance on Aviation Lighting Impact Assessment</i>, November 2024. However, the revised night-time assessment (Appendix 4A) does not agree with NS’s contention of significant effects on an individual basis and concludes that there would be no significant night-time effects on the views from any visual receptors. This is due to the varying levels of artificial light present in most of these locations and / or associated with the activity of travelling through the landscape, and the mitigating factors including viewing angle and distance of perceived light intensity. Allowing for the additional mitigating effects of angle intensity mitigation, the visibility of the lights would reduce further when viewed from low lying receptors, although this would not provide mitigation for elevated receptors (for example, hill walkers camping on summits). In respect of cumulative effects, the revised night-time assessment (Appendix 4A) agrees with NS and identifies significant combined cumulative night-time landscape and visual effects. These result from the consented Blarghour, the An Carr Dubh application and the Revised Development and would affect the ‘host’ Craggy Upland LCT and views from a small number of visual receptors in the Loch Awe area, including the parts of the settlement of Dalavich, a minor road along the western shore of Loch Awe and recreational users of the waters of Loch Awe.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
RSPB Scotland	Thursday, February 13, 2025	Objection & Design amendment	Ornithology	Objects due to the ornithological impacts of the Proposed Development, in particular, its impact on breeding Annex 1 & Schedule 1 Black-throated Diver Gavia arctica and Red-throated Diver Gavia stellata. We may reconsider our position if the Applicant addresses the following recommendation: • Turbines 3, 5 and 7 are removed from this proposal or set back ≥ 750m from all loch shores and plantation edges.	We acknowledge RSPB Scotland's response relating to these species. Turbines 3, 5 and 7 have all been removed as part of the Revised Development. An updated Outline Habitat Management Plan (oHMP) including revised enhancements for diver species is provided in FEI Report Appendix 6D . Discussions will also be held with FLS regarding the optimisation of diver raft locations.
RSPB Scotland	13th February 2025	Mitigation & Enhancement	Ecology	Full justification for, and further detail on, mitigation and enhancement measures proposed to support breeding diver species on site; and Clarity regarding the area (in ha) of montane scrub proposed to be planted. Note that RSPB Scotland presently considers the c. 14 ha of native broadleaf woodland as proposed to be inadequate considering the Proposed Development's scale, and the requirement to deliver significant Biodiversity Enhancement under Policy 3b of the Fourth National Planning Framework.	Updates provided in FEI Report Appendix 6D: Outline Habitat Management Plan .
RSPB Scotland	13th February 2025	Mitigation & Enhancement	Ecology	Peatland Restoration RSPB Scotland welcomes the Applicant's proposals for peatland restoration as detailed in the oHMP. We recommend further detail is provided to indicate that the activity proposed will exceed NatureScot thresholds in respect of meeting the 1:10 peatland impacts offsetting ratio.	A breakdown of the compensation and enhancement provisions is provided in FEI Report Appendix 6D , which also demonstrates that the activities proposed will result in a 10:1 compensation ratio being achieved at the Revised Development.
RSPB Scotland	13th February 2025	Mitigation & Enhancement	Ecology	Native Woodland Planting It is noted that the Wind Farm Forest Plan will result in a native broadleaf woodland net gain of 1.8ha against the baseline. It is unclear whether this 1.8ha is included in the c. 14ha cited above. If broadleaf woodland creation is to be counted as Biodiversity Enhancement under this proposal, the Applicant must demonstrate that it is additional to any Long-Term Forest Plan changes required for Scottish Forestry, UK Woodland Assurance Standard or Forest Stewardship Council compliance by FLS.	All HMP proposals (see FEI Report Appendix 6D), detailed in the plan, including the 14ha native woodland planting are separate to the Wind Farm Forest Plan. The 1.8ha of additional planting has been removed from the assessment
RSPB Scotland	13th February 2025	Mitigation & Enhancement	Ecology	Montane Scrub Planting RSPB Scotland also welcomes proposals to establish montane scrub in appropriate areas of the site. However, while the Applicant has indicated search areas totalling 210ha for this activity, a target delivery area (in ha) for montane scrub establishment has not been confirmed (i.e., it is assumed that delivery will not comprise the full 210ha). Thus, it is difficult to determine whether this activity, in combination with the activities above, delivers significant Biodiversity Enhancement for a development of this scale and sensitivity.	Ground-truthing of candidate montane scrub planting has been undertaken to provide greater certainty as to the extent of enhancement provisions being delivered on the Development Site. See FEI Report Appendix 6D for more details.
RSPB Scotland	13th February 2025	Mitigation & Enhancement	Ecology	Self-seeded Sitka Spruce Removal Nevertheless, RSPB Scotland considers that seedling removal would best be delivered by FLS under the 'polluter pays' principle; given that the existing, operational commercial plantation is the seed source for this invasive plant - and will likely remain so for the lifetime of the Proposed Development. RSPB Scotland considers that Applicant resources would best be directed to the delivery of further, proactive Biodiversity Enhancement activity at this location; rather than being spent on addressing an ongoing issue caused by publicly funded commercial activity.	The oHMP (FEI Report Appendix 6D) provides a suite of measures seeking to improve priority peatlands on site which address necessary 10:1 compensation provisions as supported by Nature Scot, which include the self-seeded conifer removal. In the absence of these measures there would be requirements to deliver compensatory measures outwith the Applicants influence or control.
Scottish Forestry	Wednesday, January 22, 2025	No Objection	Forestry	Compensatory planting of 91.2ha should be secured by a condition. Draft wording is provided in Annex 1 of Scottish Forestry's letter. Advice is provided on appropriate consenting routes for felling and restocking.	The applicant acknowledges the advices received and accepts the suggested condition, including a revised compensatory planting figure of 93.9ha, to reflect the Revised Development.
Scottish Water	Wednesday, November 27, 2024	No Objection	Hydrology	Scottish Water has no objection to this proposal. Please read the advice provided on Drinking Water Protected Areas and Surface Water.	The Applicant acknowledges that the Proposed Development is in a Drinking Water Protected Area. The applicant has inspected the catchments page of Scottish Water's website to ascertain its recommended list of precautions.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Condition	Renewable Energy and Peat	Many of the proposed peat storage areas are unacceptable due to encroachment into water body buffers. Following on from this, SEPA is requesting a condition is attached to any future consent that no earthworks or storage of materials including peat shall take place within 15m of a watercourse apart from those associated with an approved watercourse crossing.	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas must be more than 50m from watercourses and more than 25m from active ditches or gullies.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Holding Objection	Design	The cross section on Figure 4.12 states culverts will be designed with 1 in 200 flood flow only. In order to comply with NPF4 Policy 22, SEPA requests Figure 4.12 is amended to have a culvert design which allows 1 in 200 plus climate change flood flows and for the culverts to be bottomless arch culverts as per SEPA guidance position statement WAT-PS-06-02. Closed culverts will not be acceptable for crossings over watercourses greater than 2m in width or where the track is not the normal width of a 'single track road', i.e. 3.5m.	The Applicant would adopt best practice and accepts a planning condition to satisfy the requirements of SEPA on crossing design as noted (see Figure 2-2 of the FEI Report).
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Holding Objection & Further Information	Hydrology	In its response dated 5 th February 2025 SEPA submitted a holding objection, requesting that further information is provided in relation to peat disturbance and impact on the water environment. It has also requested a number of design changes and planning conditions which, if not be committed to by the Applicant, should also be considered objections. SEPA's comments are provided in two appendices attached to its consultation letter (Appendix 1 – general concerns and Appendix 2 – infrastructure element concerns) and its main concerns and the applicant's responses are outlined below.	Noted, see below.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further Information	Hydrology	Appendix 1 (Paragraph 1.1), SEPA comments that the EIA Report Chapter 12: Geology, Hydrology and Hydrogeology, Section 12.6 Consultation does not make reference to SEPA's follow up response, dated 25 th January 2024, to the meeting on 27 th October 2023.	The general points SEPA identified with respect to Groundwater Dependent Terrestrial Ecosystems (GWDTEs) in its 25 th January 2024 response (patches of M6 near T6 and T20 and also the assessed GWDTEs absent from any mapping) were raised in the October 2023 meeting and were addressed in the EIA Report Appendix 12F: Summary of Consultation, Table 12F1 with reference to EIA Report Appendix 12A: Groundwater Dependent Terrestrial Ecosystems Assessment (note also that T20 has now been removed from the Revised Development). However, while these were internally discussed SEPA's specific infrastructure concerns prior to submission of the EIAR it is recognised that the identification and resolution of these issues was not specifically acknowledged in the EIA Report Chapter 12: Geology, Hydrology and Hydrogeology . It is noted that these and related concerns were raised in Appendix 2 to SEPA's latest consultation response and so are addressed in the responses below.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Condition	Hydrology	Appendix 1 (Paragraph 2.1): SEPA observes that several turbine locations and their associated hard standings appear to be encroaching into 50m watercourse buffers. Whilst SEPA can accept infrastructure such as access roads and other hard standings encroaching into these, where subsurface excavations would be less than 1m deep, SEPA requests the Applicant modifies a number of turbine locations (as indicated in its Appendix 2 e.g. T3, T6, T9, T13 and T20) to ensure no deeper excavations (greater than 1m) impinge on the 50m watercourse buffers. Following on from this, SEPA also requests a condition is attached to any future consent that no excavations greater than 1m shall take place within 50m of a watercourse.	In response, T3 and T20 are no longer being proposed, whilst the proportion of the foundations of the remaining identified turbines as well as T2 within the watercourse buffers would be significantly reduced or eliminated (see Figures 3.2a-d) by making use of turbine micro-siting provisions. The Applicant would also agree to a suitably worded condition to this effect.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Condition	Hydrology	Appendix 1 (Paragraph 2.5): SEPA notes that, in order to comply with the National Planning Framework (NPF4) Policy 22, the design of the proposed culverts must be modified to permit 1 in 200 plus climate change flood flows and for culverts to be bottomless arch culverts as per SEPA guidance WAT-PS-06-02.	This advice and a proposed planning condition to this effect are accepted by the Applicant, and FEI Report Chapter 2: Project Design, Figure 2.1 presents the modified culvert design.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further Information	Hydrology	Appendix 1 (Paragraph 2.7): SEPA states that the watercourse crossings are not referenced in any of the submitted figures.	The crossing locations are shown on EIA Report Chapter 12: Geology, Hydrology and Hydrogeology, Figures 12.1, 12.4 and 12.5 and on Appendix 12A: GWDTE Risk Assessment, Annex B, Figure 12.5a and 12.5b . Crossing locations have now also been included and specifically referenced on Figure 3.1b .
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Design amendment	Hydrology	Appendix 1 (Paragraph 2.8): SEPA's Appendix 2 table requests the removal of sections of access tracks or relocation of access tracks that would reduce the number of watercourse crossings which would support the mitigation hierarchy of avoidance as the first principle.	The removal of five turbines and also redesign of the track layout has reduced the number of crossings from 92 to 88. The modification of access tracks associated with Turbine 2 and Turbine 4, to replace the proposed loop with a single access road, has led to the removal of one watercourse crossing and reduced the extent of track within watercourse buffers. The removal of access tracks associated with Turbine 3 and Turbine 5 has resulted in the removal of two watercourse crossings.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Design amendment	Hydrology	Appendix 1 (Paragraph 2.9): SEPA observes that watercourse crossings need to be as near to perpendicular to watercourses as possible. It considers this has been proposed in most cases, although not all watercourse crossings appear on the larger scale plans shown in EIA Report Appendix 6A: Peat Management Plan, Annex D Figures 6A-1 and 6A-2 . SEPA requests that the crossing associated with Borrow Pit 9 is modified and that revised Figures 6A-1 and 6A-2 showing all access tracks and crossing points are submitted for SEPA's review, prior to any consent being granted.	Borrow Pit 9 crossing has been modified as requested and, as indicated earlier, all crossings are referenced on Figure 3.1b .
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further Information	Hydrology	Appendix 1 (Paragraph 4.1): SEPA has reviewed EIA Report Chapter 10: Ecology and Appendix 10B Phase 1 Habitat Survey and National Vegetation Classification and Peatland Condition Report, EIA Report Chapter 12: Geology, Hydrology and Hydrogeology, Section 12.5 Overall Baseline and EIA Report Appendix 12A: GWDTE Assessment with regard to	As a result of the redesign, track would only encounter GWDTEs GT12 and GT228, and although this area is unsuitable for floating track given the steepness of the slopes other mitigation, such as the drainage design measures described in EIA Report Chapter

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
				GWDTEs and considers that no specific mitigation measures had been put forward for the proposed construction in these areas. It notes that the use of floating tracks would act as a mitigation measure, but other measures could include the provision of additional drainage measures to retain water flow to these areas. Once SEPA has received revised plans showing the areas of floating track, it will be able to assess whether any further commitment to specific drainage measures in the affected GWDTE areas is required.	12: Geology, Hydrology and Hydrogeology, Section 12.8 Embedded Measures and EIA Report Appendix 12G: Mitigation Measures (for inclusion in CEMP) , would be applied. On this basis a Negligible (Not significant) effect on these GWDTEs has been determined (Section 3.6).
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further Information	Carbon Rich Soils	We have reviewed Chapter 6, Appendix 6A and associated figures and welcome the large-scale figures in Appendix A with Infrastructure elements overlain on the peat depth surveys. Unfortunately, the substation and temporary compound areas do not appear to be included on these. We therefore object due to lack of information and request revised Figures 6A-1 and 6A-2 with all infrastructure elements overlain are submitted for our review prior to any consent being granted.	See Figure 7A-1 of the FEI Report.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further Information	Carbon Rich Soils	Table 1 in the Outline Peat Management Plan (OPMP) confirms a significant portion (approximately 30%) of the excavated peat will be from the excavation of new tracks and this could be significantly greater considering the running width may be up to 14m wide. We highlight the total width of excavation shown on Figure 4.11 is approximately 7.5m wide and therefore the excavated peat volumes could be significantly higher than those shown in Table 1 of the OPMP. Whilst we welcome the proposed mitigation measure to float tracks on peat deeper than 1m it is not clear on Figures 6A where these floating tracks will be. We therefore request Figures 6A are amended to clearly indicate the location of floating tracks and submitted for our review prior to any consent being granted.	See Figure 7A-1 of the FEI Report.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Design amendment	Carbon Rich Soils	Avoidance should be the first principle in the mitigation hierarchy, and we therefore request further modifications as detailed in our table in Appendix 2 are made to reduce the length of cut tracks on deeper peat by the elimination of some track sections where possible and others moved further off deeper peat. This table also identifies where other infrastructure such as turbine excavations and associated hardstandings could be moved off deeper peat.	See Figure 7A-1 of the FEI Report, as well as Appendix 7A of the FEI Report.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Condition	Carbon Rich Soils	We note from the OPMP and associated Appendices that a large proportion of the excavated peat (30%) is proposed to be used in the reinstatement of the borrow pits. Whilst we do not object to this in principle, especially if reinstatement depths will be at the depths proposed, we do have concerns over the amount of catotelmic peat that is proposed to be used in this activity, especially when this type of peat represents a very small proportion of the peat originally excavated from these areas. As no further details have been submitted in relation to the proposed borrow pit restoration, we cannot advise the Scottish Minister on whether the proposed reuse of excavated peat in the borrow pit areas will comply with NPF4 in terms of restoring and / or enhancing the site into a functioning peatland system capable of achieving carbon sequestration, or whether the use of peat would constitute waste disposal operations. We therefore request a condition is attached to any future consent which secures the submission of the following: Full details of the reinstatement for all borrow pits, including cross sections showing proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat should also be given.	Acknowledged and accepted planning condition.
Scottish Environment Protection Agency	Wednesday, February 5, 2025	Further information & Condition	Carbon Rich Soils	We note the applicant's suggestion for a micro-siting limit of 50m for wind turbines and most associated infrastructure and a 100m micro-siting allowance for certain elements such as the construction compounds and access tracks, as described in Table 4.1 of EIA Report Chapter 4: Description of the Proposed Development. However, the current proposed locations for all access tracks and the infrastructure elements with the suggested 100m micro-siting do not appear on the larger scale plans submitted, Figures 6A-1 and 6A-2, and therefore micro-siting cannot be agreed until these are presented. We therefore object until modified detailed plans are submitted for our review. Notwithstanding, our objection due to lack of information above, we request a planning condition requiring, unless otherwise confirmed by the determining authority in consultation with SEPA, any proposed micro-siting be subject to the following restrictions: (1) No micro-siting shall take place within a 50m buffer distance of a waterbody (other than as required for a watercourse crossing and related access track). In the case of the specific breaches identified in Figures XXX (to be edited once modified figures have been reviewed/agreed), micro-siting shall not move infrastructure closer to any waterbody than identified within these documents. (2) No micro-siting shall take place within areas of peat of greater depth than the original location. (3) A finalised Peat Management Plan shall be submitted which should demonstrate how micro-siting and other measures have been used to further minimise peat disturbance and impacts on near-natural peatland.	See Figure 7A-1 of the FEI Report, as well as Appendix 7A of the FEI Report. Acceptance of the planning condition subject to minor clarification in the wording that micro-siting will be undertaken using survey data available at the time.

Consultee	Date	Overarching Theme	Topic	Consultee comment	Response to Consultee
Scottish Water	Wednesday, November 27, 2024	No Objection	Hydrology	Within a drinking water catchment where a surface water abstraction is located, so a Drinking Water Protection Area. Douglas Water supplies Inveraray Water Treatment Works but considered low risk. Developer advised to check out Scottish Water's DWPA protection measures.	The Applicant has taken up Scottish Water's invitation to inspect its online guidance with respect to wind farm activities and would adhere to this guidance during the works. The majority of Scottish Water's mitigation measures are already incorporated in the Outline Construction Environment Management Plan (CEMP, EIA Report Appendix 12G: Mitigation Measures (for inclusion in CEMP)).
Transport Scotland	Friday, December 13,2024	Conditions	Traffic and Transport	Based on the review undertaken, we can confirm that while we are satisfied with the impact assessment undertaken, we would be of the view that additional work is required in relation to the abnormal loads route. In the interests of moving forward, however, Transport Scotland is prepared to proceed with appropriate planning conditions and would ask that the following conditions are attached to any consent that is granted: • Condition 1: 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 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. Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development. • Condition 2: Prior to commencement of deliveries to site, the proposed route for any abnormal loads on the trunk road network must be submitted to and approved by the Planning Authority, in consultation with Transport Scotland as the trunk roads authority. Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development. • Condition 3: Prior to the movement of any abnormal load, any accommodation measures required on the trunk road network, including the removal of street furniture, junction widening and traffic management must be approved and implemented to the satisfaction of the Planning Authority, in consultation with Transport Scotland. Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development. • Condition 4: Prior to the movement of any components and/or construction materials, any additional signing or temporary traffic control measures deemed necessary on the trunk road network due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland. Reason: To ensure that the transportation of any components/materials will not have any detrimental effect on the road and structures along the route.	The Applicant accepts the conditions detailed in Transport Scotland's response.
Transport Scotland	Friday, December 13,2024	Further information	Traffic and Transport	In addition to the above Conditions, the applicant should be informed of the following advisory notes setting out requirements relating to works within the trunk road boundary: I. The applicant should be informed that the granting of planning consent does not carry with it the right to carry out works within the trunk round boundary and that permission must be granted by Transport Scotland Roads Directorate. II. Trunk road modification works shall, in all respects, comply with the Design Manual for Roads and Bridges and the Specification for Highway Works published by HMSO. The developer shall issue a certificate to that effect, signed by the design organisation. III. Trunk road modifications shall, in all respects, be designed and constructed to arrangements that comply with the Disability Discrimination Act: Good Practice Guide for Roads published by Transport Scotland. The developer shall provide written confirmation of this, signed by the design organisation. IV. The road works which are required due to the above Conditions will require a Road Safety Audit as specified by the Design Manual for Roads and Bridges. V. Any trunk road works will necessitate a Minute of Agreement with the Trunk Roads Authority prior to commencement. VI. To obtain permission to work within the trunk road boundary the developer should contact the Area Manager through the general contact number 0141 272 7100. VII. The Operating Company has responsibility for co-ordination and supervision of works and after permission has been granted it is the developer's contractor's responsibility to liaise with the Operating Company during the construction period to ensure all necessary permissions are obtained.	The Applicant acknowledges the advisory notes provided by Transport Scotland relating to works within the trunk road boundary.

