

Appendix 1B: Response to Appendix 2 to SEPA Consultation

Infrastructure element	SEPA Observations	Modification required by SEPA	Response to Consultee
T1	Acceptable location	None	Noted
T2	Our previous comments do not appear to have been taken on board with the northern most auxiliary crane pad placed over a watercourse. This will constitute culverting for land gain, which SEPA is opposed to unless the culverting will be temporary, and the watercourse will be reinstated. The loop road should be replaced by one access route to eliminate the need for an additional watercourse crossing, the current encroachment into the 50m watercourse buffer and additional peat excavation for the track. Figure 6A-2 Peat storage area unacceptable within watercourse buffer	Applicant to confirm either: a) micro siting of this northern crane pad further north would be possible and all earthworks including any batters would be outwith to be outwith 15m buffer zone of the watercourse; OR b) the applicant commits to the removal of the temporary culvert associated with the auxiliary crane pad, once the hard standing has been removed, and to the reinstatement of the watercourse. Applicant to modify access road loop to single access road.	The applicant commits to the removal of the temporary culvert associated with the auxiliary crane pad, once the hard standing has been removed, and to the reinstatement of the watercourse. With respect to the access tracks associated with T2, the Revised Development design includes the modification of the access road loop to a single access road, thereby removing the bottom part of the former loop and the associated watercourse crossing. See Figure 3.2a for more detail.
T3	Potential to move north with micro siting to reduce peat excavations? Track & infrastructure on top of moderate and high GWDTE GT30, GT28	Applicant to confirm if micro siting north can be considered and whether floating track or other mitigation measures will be implemented over the GWDTE.	Turbine 3 has been removed from the Revised Development.

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T4	Buffer encroachment is acceptable in this instance with relatively shallow excavations for the auxiliary crane hardstandings. However, we request one of the access roads to this turbine is removed - the loop road should be replaced by one access route to eliminate the need for an additional watercourse crossing, the current encroachment into the 50m watercourse buffer and associated additional peat excavation. Our preference would be the removal of the northern section of this loop as this currently has two new watercourse crossings and the northern most crossing will be very close to two existing watercourse crossing which may lead to an extended length of culvert. If this is the preferred access, we would like to see the access new access track where it meets the existing brought further south to eliminate the need for the new watercourse crossing or further north away from the existing culverts. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to confirm part of this access road can be removed and alignment altered to reduce watercourse crossings and be moved away from existing culverts. Applicant to remove storage area outwith 15m buffer of watercourse	The Revised Development design includes the modification of the access road loop to a single access road, thereby removing the remainder of the former loop and the associated watercourse crossing. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T5	Track & infrastructure on top of moderate GWDTE GT28	Applicant to confirm floating track or other mitigation measures will be implemented over the GWDTE.	Turbine 5 has been removed from the Revised Development.
T6	New access track and hardstandings encroach on 50m buffer to adjacent watercourse and small lochan. Deeper Turbine excavations likely to encroach to within 50m of the watercourse. Figure 6A-2 Peat storage area unacceptable within watercourse	Applicant to confirm/illustrate a minimum of 15m buffer around the lochan and watercourse can be achieved for any excavations/earthworks associated with built elements.	The applicant confirms that, by making use of the turbine micro-siting provisions, the proportion of T6 foundations within the watercourse and lochan buffers would be significantly reduced or eliminated (see Figures 3.2b). The Applicant would agree to the proposed condition.

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	and lochan buffers.	Applicant to confirm limit of turbine excavation area can be moved outwith the 50m buffer of the Allt Nighinn. Applicant to remove storage area outwith 15m buffer of watercourse and lochan	See response above. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies.
T7	50m buffer encroached with hardstandings. Acceptable in this instance to avoid deeper peat. Figure 6A-2 Peat storage area unacceptable within lochan buffer.	Applicant to confirm no turning head spur road required at the end of this road and, if required, illustrate that a 15m minimum buffer can be achieved. Applicant to remove storage area outwith 15m buffer of lochan.	Turbine 7 has been removed from the Revised Development. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T8	Access track over deeper peat. Figure 6A-2 Peat storage area maybe within lochan buffer.	Applicant to confirm floated track locations. Applicant to confirm storage area outwith 15m buffer of lochan.	See Figure 7A.1 of the FEI Report for floated track locations. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies.
T9	Access track and associated hard standing on deeper peat Deep excavations associated with turbine base too close to watercourse. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to confirm the turbine and associated infrastructure can be moved at least 50m SE away from Allt Nighinn watercourse. Applicant to remove storage area outwith 15m buffer of watercourse.	The applicant confirms that, by making use of the turbine micro-siting provisions, the proportion of T9 foundations and associated infrastructure within the watercourse and lochan buffers would be significantly reduced or eliminated (see Figures 3.2a-d) . The Applicant would agree to the proposed condition. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat

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			storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 3.2c for more detail.
T10	Deep excavations associated with turbine base will encroach onto deeper peat. Figure 6A-2 Peat storage area unacceptable within watercourse Buffer.	Applicant to confirm the turbine and associated infrastructure can be moved 30m minimum SE off deeper peat. Applicant to remove storage area outwith 15m buffer of watercourse.	The applicant confirms that T10 and associated infrastructure would be relocated 30m minimum SE off deeper peat, by making use of turbine micro-siting provisions. The Applicant would agree to the proposed condition. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T11	Move 20-30 NE to give a wider buffer to the small lochan situated at the end of end spur of the access track and move turbine base further off deeper peat. Figure 6A-2 Peat storage area unacceptable over small lochan.	Applicant to confirm/illustrate a 15m minimum buffer to the small lochan can be achieved and that the turbine base can be moved further off deep peat by moving the turbine and associated hardstandings further NE. Can spur /turning head be removed? Applicant to remove storage area outwith 15m buffer of lochan.	Turbine 11 has been removed from the Revised Development.
T12	Acceptable location Figure 6A-2 Peat storage area unacceptable within watercourse buffers.	Applicant to remove storage area outwith 15m buffer of watercourses	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T13	Our previous comments do not appear to have been taken on board with one auxiliary crane pad placed over a	Applicant to confirm/illustrate if the turbine and associate hardstandings can be moved NE wards in order that	The applicant confirms that, by making use of the turbine micro-siting provisions, the proportion of T13 foundations and associated infrastructure within the

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	watercourse – we highlighted previously this would necessitate an amendment to the proposed design layout as this will constitute culverting for land gain. Turbine on deeper peat. Track through moderate GWDTE GT3 and goes over Tom Mor ridge with steep gradients – not clear if this will need cut. Recommend access track comes from the south and following the contours south of the spur of land named Tom Mor - this will remove infrastructure from the watercourse buffer and eliminate the impact on the moderate GWDTE on the Tom Mor spur. Also reduce the volume of soil disturbance by reducing track required length. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	the turbine base can be moved further off deep peat and the need for culverting can be eliminated – can the auxiliary crane hardstandings to straddle the watercourse equidistantly so as not require culverting for land gain? Applicant to confirm modification of track layout to removing section over Tom Mor. Applicant to remove storage area outwith 15m buffer of watercourse.	watercourse and lochan buffers would be significantly reduced or eliminated (see Figures 3.2a-d) . The Applicant would agree to the proposed condition. The Revised Development design includes the modification of the access track associated with Turbine 13, removing the section over Tom Mor. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies.
T14	OK – although an area c.100m SW would appear have the potential for less peat disturbance. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to confirm why area between the two peat probed areas has not been considered. Applicant to remove storage area outwith 15m buffer of watercourse.	To re-design and cut a bit of area out to keep out of 15m buffer. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T15	Acceptable location Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to remove storage area outwith 15m buffer of watercourse/limit to west of track.	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T16	Acceptable location although potential for hardstandings and turbine to be flipped to	Applicant to confirm whether flipping location of turbine and hardstandings is possible.	The applicant confirms that T16 and associated infrastructure could be flipped by making use of turbine micro-siting provisions.

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	eliminate end of access track encroaching into deeper peat/have shorter access track.		
T17	Acceptable location. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to remove storage area outwith 15m buffer of watercourse.	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T18	Acceptable location although is turning head on deeper peat required? And if so will it be floated?	Applicant to confirm whether turning head is required.	The applicant confirms that T18 and associated turning head have been modified to avoid areas of deeper peat.
T19	Acceptable although appears to be potential to be on shallower peat and less steep ground if moved 50m SE Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to confirm whether moving turbine/hardstandings 50m SE has been considered. Applicant to remove storage area outwith 15m buffer of watercourse.	Moving T19 and associated hardstanding to the SE was considered. However, this would move these features closer to the adjacent rather sensitive lochan. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T20	Some excavations on deeper peat Deeper excavations within 50m buffer of small lochan and watercourse to the north. Track & infrastructure on top of/adjacent to moderate and high GWDTE GT206.	Applicant to confirm/illustrate if the turbine and associated hardstandings can be moved southwards in order that the turbine base can be moved further off deep peat and out of the 50m buffer of the small lochan and watercourse to the north. Applicant to confirm floating track or other mitigation measures will be implemented over the GWDTE.	Turbine 20 has been removed from the Revised Development.
T21	Acceptable location	Applicant to remove storage area outwith 15m buffer of watercourse.	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat

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	Figure 6A-2 Peat storage area unacceptable within watercourse buffer.		storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
T22	New access track spur is too close to watercourse. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to confirm/illustrate access track turning head can be located at least 15m from top of bank of watercourse or confirm it can be removed. Applicant to remove storage area outwith 15m buffer of watercourse.	The applicant confirms the access track turning head can be located at least 15m from top of bank of watercourse. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
Meteorological mast	Mast and access track on deeper peat - shallower peat close by.	Applicant to confirm/illustrate the mast and the associated access track can be moved north onto shallow peat	The Applicant confirms the mast could be moved to areas of shallower peat. However, the majority of the access track is existing and would therefore not be proposed to be moved.
Temp compound 1	Has not been included on Figure 6A-1 or Figure 6A-2 – no micro-siting can be agreed until these are included.	Applicant to submit peat survey and storage plan for this site for review	See Figure 7A-1 of the FEI Report for temporary compound locations against peat depths. See Figure 7A.1 for more detail.
Temp compound 2	Has not been included on Figure 6A-1 or Figure 6A-2 – no micro-siting can be agreed until these are included.	Applicant to submit peat survey and storage plan for this site for review	See Figure 7A-1 of the FEI Report for temporary compound locations against peat depths. See Figure 7A.1 for more detail.
Substation	Has not been included on Figure 6A-1 or Figure 6A-2 – no micro-siting can be agreed until these are included. As stated in our previous response (25 January 2025) culverting. We would object to any proposal to culvert this for land gain.	Applicant to submit peat survey and storage plan for this site for review	See Figure 7A.1 of the FEI Report for substation location against peat depths.
B1	Peat in the western part – can this be reduced or moved eastwards?	Applicant to commit to reducing extent/moving off deeper peat.	The Applicant acknowledges that B1 overlaps pockets of deep peat. The applicant commits to confirming the

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			presence of deep peat during full ground investigation and that final borrow pit will be designed to avoid any present.
B2	Can this not be accessed from the existing track further south-west to avoid the deepest area of peat in the north part of this site?	N/A	Yes, borrow pit 2 will require the use of an existing track to access.
B3	OK – good for expanding if required.	N/A	
B4	OK – good for expanding if required. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to remove peat storage area outwith 15m buffer of Watercourse.	Borrow pit B4 lies outside the watercourse buffer. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
B5	OK – good for expanding if required. Figure 6A-2 Peat storage area unacceptable within watercourse buffer.	Applicant to remove peat storage area outwith 15m buffer of Watercourse.	The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail.
B6	OK – good for expanding if required.	N/A	Noted.
B7	OK – good for expanding if required.	N/A	Noted.
B8	Is this necessary? Request to remove deeper peat areas, at least on upper part. Appear to be closer than 50m – no excavations deeper than 1m to be within 50m from watercourse. Will require detailed plan to confirm this.	Applicant to remove peat storage area outwith 15m buffer of Watercourse.	See Figure 7A.1 of the FEI Report for borrow pit location against peat depths. B8 is outside watercourse buffer.

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B9	Pull back off area of deeper peat in the west – happy for it to extend SE wards. Figure 6A-2 Peat storage area unacceptable within watercourse buffer. New track to the NE – is not crossing the watercourse Allt nam Muc perpendicularly – needs modification. As previously highlighted this crossing is problematic as shown. Less than 50m from watercourse – will need to amend – no excavation greater than 1m to be within 50m of the watercourse.	Applicant to remove peat storage area outwith 15m buffer of Watercourse.	BP9 has been re-designed to avoid areas of deeper peat. The PMP (Appendix 7A of the FEI Report) notes that the criteria includes that potential temporary peat storage areas will be more than 15m from watercourses, active ditches and gullies. See Figure 7A.1 for more detail. Borrow Pit 9 crossing has been modified as requested and, as indicated earlier, all crossings are referenced on Figure 3.1b. Borrow pit 9 is an existing FLS borrow pit that already extends to the existing access track. It has been designed to avoid the lochan.
New and upgraded Access tracks	Large scale plans of all stretches of access tracks have not been provided within the series of Figures 6A-1 and 6-A2. No indication of extent of earthworks/cut & fill not extents of floating tracks are given – no micro-siting can be agreed until these are included. Some are encroaching into 50m buffers for waterbodies and onto deeper peat.	Applicant to submit large scale plans – additional Figures 6A-1 and 6A-2 showing all access tracks for review. These should include an indication of where floating tracks will be used. If possible, areas of cut and fill should also be estimated. Where excavation/cut will be greater than 1m tracks should be outwith waterbody buffers unless associated with a watercourse crossing.	See Figure 7A.1 of the FEI Report for floated track locations.