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## INTRODUCTION

- 6.1 **Chapter 6: Scoping and Consultation**, of the Environmental Impact Assessment Report (EIA Report) sets out the Scoping process that was undertaken as part of the EIA for the proposed development. It also details additional consultation that has been undertaken in respect of the proposed development with consultees.
- 6.2 The following Technical Appendices associated with Chapter 6 of the EIA Report remain valid:
- **Technical Appendix 6.1: Scoping Response Table.**

## POST SUBMISSION CONSULTEE RESPONSES

- 6.3 Since submission, consultation responses have been received from consultees on various elements of the application. Where required, responses have been issued (prior to this Supplementary Environmental Information (SEI)) to the relevant consultees in order to address questions and concerns. Where considered appropriate, consultee responses have been addressed within the relevant chapters of this SEI document (SEI Chapters 7 – 15).
- 6.4 This SEI has been produced in order to address consultee responses from The Highland Council (THC), NatureScot, Scottish Environment Protection Agency (SEPA), and the Royal Society for the Protection of Birds (RSPB). Their consultee responses that have required the production of this SEI are detailed in **Table 6-1**.

**Table 6-1: Post Submission Key Consultee Comments**

Consultee	Summary of Consultee Response	Comment / Where Addressed in this SEI
The Highland Council 17 May 2023	<p><b>Cumulative Assessment</b></p> <p>The cumulative picture around Strathy is getting very complicated with 4 onshore wind farm applications pending consideration:</p> <ol style="list-style-type: none"> <li>1. Bettyhill Phase 2 (23/00142/FUL)</li> <li>2. Armadale (22/01972/S36 - amended scheme pending submission)</li> <li>3. Kirkton (22/05533/S36)</li> <li>4. Melvich (23/02320/S36 - circled yellow – recently submitted)</li> </ol> <p>Then we also have:</p> <ul style="list-style-type: none"> <li>• Ackron wind farm (withdrawn and new Scoping layout expected 2-3 months time – site circled pink).</li> <li>• Dounreay Test and Demo Floating wind farm (16/04775/S36 and 20/05164/SCOP).</li> <li>• Pentland Offshore Wind Farm (22/03864/S36 – THC Raised No Objection in December 2022).</li> </ul>	SEI Chapters 1 to 15

Consultee	Summary of Consultee Response	Comment / Where Addressed in this SEI
	<ul style="list-style-type: none"> <li>West of Orkney Wind Farm (22/01589/SCOP), plus associated onshore connection infrastructure (22/00972/SCOP &amp; 22/05500/PAN – note likely A836 traffic impacts).</li> </ul> <p>In light of the evolving cumulative position, the Council require each of the technical chapters within the Kirkton EIAR to be reviewed, with provision of updated cumulative assessments. These should ideally also include all applications at Scoping stage to help avoid further EIAR AI / FEI.</p> <p><b>Landscape and Visual</b></p> <p>We would request that alongside the assessment text, a series of updated cumulative ZTV mapping, and new wireframes be provided to illustrate Kirkton alongside all other development proposals. This should include both onshore and offshore schemes, with this requirement also identified within NatureScot’s consultation response.</p> <p>Whilst the Council is still in the process of considering the landscape and visual assessment, with a response from our Landscape Officer still pending, it is advised that upon receipt of the EIAR AI wireframes, it would then be our intention to run the Council’s Panoramic Viewer and insert individual wind farm scheme’s photomontages so that the cumulative impact can be considered and presented to committee. To do this we would require panoramic images (a full colour photomontage and a monochrome photomontage showing the updated cumulative position) for select viewpoints. We can confirm the exact viewpoints in due course, but currently consider merit in including: VP8 – Beinn Ratha and VP9 – Strathy Point, however this is subject to further discussion with the Council’s Landscape Officer. Please refer to Section 5 of THC’s Visualisation Standards for submission requirements.</p> <p><b>Candidate WHS Assessment</b></p> <p>Following the adoption of the attached Position Statement by committee earlier this month (effective immediately), the Council requires applications to be accompanied by an assessment of the proposal’s impact on the Candidate Site’s WHS Outstanding Universal Values (OUVs). The Council does not consider assessments against non-WHS criteria to suffice against the specific Candidate WHS criteria and attributes. Any implications of the Position Statement for the current application will follow this assessment. The tool kit is available here <a href="https://whc.unesco.org/en/guidance-toolkit-impact-assessments/">https://whc.unesco.org/en/guidance-toolkit-impact-assessments/</a></p> <p>Given that the southern part of the site, 7 turbines, fall within the candidate WHS, this has led to the attached objection having been received from the Council’s Ecology Officer (refer to the Council’s onshore wind map extract above and online version for the precise WHS boundary.) The advice given to date is that the loss of blanket bog within the site would negatively impact the OUV. Additionally, the ecologist’s response highlights the need to assess bird species that are listed as attributes of the WHS and form part of its OUV. As such, the Council requests the aforementioned assessment to be undertaken in the first</p>	<p><b>SEI Chapter 7</b></p> <p><b>Outstanding Universal Values Assessment Document</b></p>

## SEI SCOPING AND CONSULTATION 6

Consultee	Summary of Consultee Response	Comment / Where Addressed in this SEI
	<p>instance, with its findings then to be subject to further consultation with all interested parties. At present, the Council is not in a position to support the application at officer level as the development may be detrimental to the candidate site's bid for world heritage status, which will be considered by UNESCO in July 2024.</p> <p><b>Transport</b></p> <p>Please also consider the cumulative impacts of construction traffic on the network should all applications pending consideration at present, as well as those at EIA Scoping, be built out, either concurrently or on a phased basis, in addition to the required anticipated likely grid connection upgrades to accommodate these proposals.</p> <p><b>Noise</b></p> <p>Environmental Health has stated that the EIAR confirms that the property at Ar Dachaidh is financially involved. Please confirm that this financial involvement also relates to the property occupier. The noise assessment will also need to consider the updated cumulative position with Melvich Wind Farm.</p> <p><b>Forestry</b></p> <p>Although the Council's Forestry Officer is yet to provide comment, it is noted that Scottish Forestry's consultation response requires the detail of the proposed compensatory tree planting provision to be provided at the application stage. The Council are supportive of this approach given the extent of forestry removal proposed, and to better understand the BNG credentials of the scheme.</p>	<p><b>SEI Chapter 12</b></p> <p><b>SEI Chapter 13</b></p> <p><b>SEI Chapter 3</b></p>
<p>SEPA 17 May 2023</p>	<p>Thank you for your email of 26 April which included the letter from SLR Consulting Limited of that date. It provides further information relating to the likely groundwater dependence of habitats in the vicinity of T7.</p> <p>We have considered the additional information provided and are content that the M6c Mire in mosaic with U2 in the area of T7 is unlikely to be groundwater dependent and as a result are content that the mitigation measures outlined in the EIA-R can be used to minimise the potential impacts. As a result the second bullet point of section 1 of our previous response (our reference 7478) is revised to Turbine 7 needing to be micro-sited to minimise direct impacts on M6 habitat.</p>	<p><b>SEI Chapter 3 and SEI Chapter 10</b></p>
<p>NatureScot 31 July 2023</p>	<p>We identified, during our site visit, that the proposal site includes a variety of habitats of varying condition. There are areas on site which are more sensitive to development than others. Such an area is the access track to turbines 5-11 where it crosses an area of deep peat centred around NC88225947. We advise this area is avoided, with access moved to the north or south of this area. In addition, there is an area between turbine 6 and 7 which is of much deeper peat. While this is mainly avoided in the current design, any site micro-siting should ensure this area continues to be avoided. Avoiding these 2 areas would reduce the impact on carbon-rich soils, peat and peatland habitat within the proposal site.</p>	<p><b>SEI Chapter 3 and SEI Chapter 10</b></p>

Consultee	Summary of Consultee Response	Comment / Where Addressed in this SEI
<p>RSPB 27 January 2023</p>	<p>After considering the application and EIAR we are content that the development proposal, in itself, would be unlikely to result in a significant adverse effect on the Caithness and Sutherland Peatlands SPA and SAC, despite the site’s proximity and overlap with the protected sites boundary. In summary, this is due to the low numbers of SPA bird flights at collision risk and SPA breeding birds within disturbance distances of infrastructure; and the distance of infrastructure, downhill from the SAC boundary.</p> <p>However, there is a lack of assessment of the likely effects on the Caithness and Sutherland Peatlands SPA resulting from habitat changes proposed in the Habitat Management Plan submitted as part of the proposal. The proposed measures would be likely to make the site more attractive to a number of qualifying species of the SPA, therefore, information on likely impacts is needed to inform a Habitat Regulations Appraisal.</p> <p>We therefore object due to a lack of information and assessment of the effects of the proposal, specifically the HMP measures, on the Caithness and Sutherland Peatlands SPA. We will consider our position in light of the submission of such further information or design changes (i.e., moving Ts 1 and 2 further from the restoration area or removing them from the scheme).</p> <p>We would like to draw Ministers attention to the fact that this proposal is situated within the sensitive Flow Country landscape, where a number of other operational, consented and in-planning wind farms exist. We are concerned about the high cumulative impacts on some of the qualifying features of the adjacent designated sites, namely hen harrier and golden plover.</p> <p>We also have concerns with the methodology and approach to the EIA, for a number of reasons, and we believe further mitigation is required.</p> <p>Without prejudice to our position and subject to the conclusions of HRA, we welcome the ambitious and beneficial forest-to-bog restoration plan.</p>	<p>SEI Chapter 9</p>