



Technical Appendix 6.1: Scoping Response Table

Windburn Wind Farm

Wind 2 Limited

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SLR Project No.: 428.07767.00009

2 June 2025

Revision: 01

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
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Table 1-1: Summary of Scoping Responses

Consultee	Summary of Responses	Where Response Addressed
Energy Consents Unit (ECU)	<u>Biodiversity</u> The Company should take note of the requirements of Policy 3b of National Planning Framework 4 whereby biodiversity enhancements are to be provided in addition to any proposed mitigation. Information on predicted losses and proposed offsetting and delivery of positive effects on biodiversity should be clearly set out in the EIA report.	Chapter 4: Renewable Energy and Planning Policy Chapter 8: Ecology
	<u>Bird Surveys</u> It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot.	Chapter 9: Ornithology
	<u>Borrow Pits</u> Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	Chapter 10: Hydrology, Hydrogeology, and Geology TA 10.3: Borrow Pit Appraisal
	<u>Drinking Water Protected Areas</u> Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	Chapter 10: Hydrology, Hydrogeology, and Geology



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Fish</u></p> <p>MSS provide generic scoping guidelines for onshore wind farm and overhead line development (https://www2.gov.scot/Topics/marine/Salmon-TroutCoarse/Freshwater/Research/onshoreren) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.</p> <p>In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.</p>	Chapter 8: Ecology
	<p><u>Mitigation</u></p> <p>The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.</p>	Technical Chapters (7 to 14) Chapter 15: Schedule of Commitments
	<p><u>MSS Standing Advice</u></p> <p>Standing advice from MSS is included. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.</p>	Chapter 8: Ecology MSS Checklist
	<p><u>Noise Assessment</u></p> <p>The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 11 of the scoping report. The noise assessment report should be formatted as</p>	Chapter 14: Other Issues



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	per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise."	
	<p><u>Peat Landslide Hazard and Risk Assessment</u></p> <p>Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.</p>	<p>Chapter 10: Hydrology, Hydrogeology and Geology</p> <p>Technical Appendix 10.1: Peat Landslide Hazard Risk Assessment</p>
	<p><u>Private Water Supplies</u></p> <p>Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.</p>	Chapter 10: Hydrology, Hydrogeology and Geology
	<p><u>Viewpoints and Visualisations</u></p> <p>The scoping report identified viewpoints at Table 6-3 (page 23) to be assessed within the landscape and visual impact assessment. Clackmannanshire Council have requested an additional viewpoint in section 6.0 of their response. Friends of the Ochils and NatureScot have also requested an additional viewpoints.</p>	Chapter 7: Landscape and Visual



Consultee	Summary of Responses	Where Response Addressed
Clackmannanshire Council	<p><u>The Proposed Development</u></p> <p>It is considered that the assessment should include the impacts from the design and layout and routing of the proposed battery storage element and grid connection (para 3.2.2) to Braco. It is not considered that the connection should be outwith the scope of the assessment even if it is to be installed by a third party. If the connection was routed to the south this could result in significant environmental impacts.</p> <p>Is it possible to know what the solution to mitigate impact on radar as agreed with NATS will comprise and will it have any environmental impacts.</p> <p>Para 3.2 - the battery storage element could also have significant impacts and information on its location should be clarified.</p> <p>Para 3.4 - while the reasoning is acknowledged, some information about the scope and nature of decommissioning should be included including options.</p>	<p>Chapter 2: Site Description and Design Evolution</p> <p>Chapter 3: Description of Development.</p> <p>Technical Chapters (7 to 14)</p> <p>TA 3.1: Outline CEMP</p>



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Landscape and Visual</u></p> <p>The approach should apply best practice advice and guidance including that published by NatureScot.</p> <p>Table 6.2 on page 22 suggest that The Forest Special Landscape Area be scoped out. However, this area includes Gartmorn Dam Country Park and other areas used for recreation and the development is understood to be visible from these locations. Consideration should be given to given to scoping this area in.</p> <p>Table 6.3 identifies possible viewpoints. It is suggested consideration is given to additional viewpoints; on the B9140, possibly between Fishcross and Collyland Roundabout. On other hilltops in the Ochils such as Ben Ever or a top accessible from Glen Devon; and the right of way between Blackford and Tillicoultry.</p> <p>Para 6.7.7 - it is noted that no visible aviation lighting is required or proposed. This should be verified.</p> <p>Para 6.8.1 – it is suggested consideration is given to effects on receptors travelling on the railway between Alloa and Stirling. The fifth bullet point appears to acknowledge that recreational receptors are not confined to Core Path routes and under the Land Reform Act, such access is across the whole of the hill range. This will include hill summits and the various routes to them. Clackmannanshire Council has not included the most popular routes in its Core Path Plan.</p>	<p>Chapter 7: Landscape and Visual</p>



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Ecology and Ornithology</u></p> <p>We would highlight that we understand there is a candidate Local Nature Conservation Site at Alva Moss roughly centred on NN885022. This should form part of the assessment.</p> <p>The proposals should commit to and identify measures to enhance the biodiversity value of the site if it proceeds including a commitment from land owners.</p> <p>Clackmannanshire Council referred to their pre-app advice issued on 19 July 2022 – they advised that the following species should be considered in the EIA: Mountain Hare, Bats, Raptors. They recommended existing habitats on the site are surveyed and assessed. Suggested that moorland bird surveys are undertaken, and that pink footed geese should be considered in the EIA.</p>	<p>Chapter 8: Ecology</p> <p>Chapter 9: Ornithology</p>



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Archaeology and Cultural Heritage</u></p> <p>Appendix 4 - Castle Campbell – this receptor is to be excluded but it is not clear if the turbines would or would not be visible from the Castle. Can this be clarified to justify exclusion. Also should the Wallace Monument and Stirling Castle not be included given their significance and visitor numbers.</p>	Chapter 11: Cultural Heritage and Archaeology.
	<p><u>Noise and Vibration</u></p> <p>The assessment should demonstrate there would be no significant risk of nuisance to settlements in the Hillfoots, notably Alva.</p>	Chapter 14: Other Issues
	<p><u>Socio-economics, Tourism, Recreation and Land Use</u></p> <p>It is considered that the baseline should include the results of a survey of visitors to the Ochil Hills (western hills and summits possibly including Dumyat) to establish the numbers using the hills for recreation and inform the assessment of the impacts and sensitivity of the site. The scope, timing and arrangements should be agreed with the respective local authorities.</p> <p>The assessment should recognise that the development would be visible and prominent from the most visited summits and routes in the western Ochil Hills and should provide an analysis of how it would impact and compare with the existing position in terms of visibility/ effect on important viewpoints/ duration of impact on receptors using the hills.</p> <p>Para 13.2 - it is suggested consultation includes the following groups; Dollar Community Council; Muckhart Community Council; Friends of the Ochils; Discover Clackmannanshire; Muckhart and Glendevon Amenity Society; and Ochil Hill Runners.</p>	<p>Chapter 13: Socio-economics, Tourism, Recreation, and Land Use.</p> <p>Technical Appendix 13.1: Ochil Hills Recreation Usage Survey</p>



Consultee	Summary of Responses	Where Response Addressed
Perth and Kinross Council	<p><u>Decommissioning</u></p> <p>Information on the works required to decommission and restore the site at the end of its operational life should be provided within the EIAR. However, it is accepted that it is not possible to provide a detailed assessment of these matters at this stage.</p>	<p>Chapter 3: Description of Development.</p> <p>TA 3.1: Outline CEMP</p>
	<p><u>LVIA</u></p> <p>The proposed Craighead Wind Farm is located approximately 15km to the east of the site and should be included in the assessment of potential cumulative impacts.</p>	<p>Chapter 7: Landscape and Visual</p>
	<p><u>Noise</u></p> <p>It is recommended that the applicant consult with PKC Environmental Health directly to agree the Noise Sensitive Receptors, as early as possible. However, noting the remote location and the limited number of receptors it is likely that the correct receptors have already been identified.</p>	<p>Chapter 14: Other Issues</p>
	<p><u>Ecology</u></p> <p>PKC agrees with the scope of the surveys subject to further information arising from field surveys and desk study to be carried out.</p> <p>Biodiversity enhancement opportunities and intentions should be considered and discussed under this wider heading.</p>	<p>Chapter 8: Ecology</p>
	<p><u>Ornithology</u></p> <p>PKC agrees with the overall scope and intentions of the assessment.</p>	<p>Chapter 9: Ornithology</p>



Consultee	Summary of Responses	Where Response Addressed
	<u>Archaeology and Cultural Heritage</u> PKC agrees with the assessment methodology and the study areas proposed, including the distance limits set. PKC agrees with the potential setting impacts identified.	Chapter 11: Cultural Heritage and Archaeology.
	<u>Socio-economics, Tourism, Recreation and Land Use</u> PKC confirms and accepts the scope and assessment methodology proposed. No additional sources of information are considered applicable in this instance.	Chapter 13: Socio-economics, Tourism, Recreation, and Land Use.
Stirling Council	<u>Landscape and Visual</u> Stirling Council have previously raised the following viewpoints in previous consultations, as highlighted in paragraph 3.1.3 of the scoping: Stirling Castle Esplanade and The A9 near Balhaldie Services. Whilst acknowledging turbine heights have been reduced from 180m to 149.9m ZTV mapping indicates potential visibility from these viewpoints so we would again request these be considered in the list of view point locations as they are respectively an iconic viewpoint and key tourist route/gateway. Drummarnock Wind Farm proposal should be included in assessment.	Chapter 7: Landscape and Visual
Fife Council	No Comment	N/A
Historic Environment Scotland (HES)	We consider that Sauchie Tower, tower and house (SM629) and Lairhill, standing stone alignment 400m SSW of (SM4539) should not be scoped out of the assessment. We note that impact on setting is described as an indirect impact in the EIA scoping report. For the purposes of EIAs, indirect impact applies to indirect physical impact only, and setting impact should be considered separately. Setting impacts are generally direct and result from the proposal causing change within the setting of the heritage asset that affects its cultural significance or the way in which it is understood, appreciated and experienced.	Chapter 11: Cultural Heritage and Archaeology



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	<p>We recommend that the type of development to be considered should not be limited to wind farm at this stage.</p> <p>It would be helpful if clarification could be made regarding the scope for identifying cultural heritage assets that may be subject to significant impacts “<i>within the limits of the proposed development and within 10km of the proposed turbines</i>” (second paragraph of Chapter 10.0 in page 57 refers), as we do not recommend the use of a simple distance for this purpose.</p>	
Scottish Environment Protection Agency (SEPA)	<p>We consider that the following key issues must be addressed in the Environmental Impact Assessment process:</p> <ul style="list-style-type: none"> a) Map and assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications. b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers c) Map and assessment of impacts upon groundwater abstractions and buffers. d) Peat depth survey and table detailing re-use proposals. e) Map and table detailing forest removal. f) Map and site layout of borrow pits. g) Schedule of mitigation including pollution prevention measures. h) Borrow Pit Site Management Plan of pollution prevention measures. i) Map of proposed waste water drainage layout. j) Map of proposed surface water drainage layout. k) Map of proposed water abstractions including details of the proposed operating regime. l) Decommissioning statement. <p>A draft Peat Management Plan will be prepared and form part of the EIA Report. We note that the peat depth data on Figure 17 ‘Peat Depth Plan’ only covers part of the site. Additional survey work</p>	<p>Chapter 10: Hydrology, Hydrogeology and Geology</p> <p>Chapter 3: Description of Development</p> <p>Chapter 14: Other Issues</p> <p>Chapter 15: Schedule of Commitments</p> <p>Technical Appendix 3.1: Outline CEMP.</p> <p>Technical Appendix 10.1: Peat Landslide Hazard Risk Assessment</p> <p>Technical Appendix 10.2: Peat Management Plan</p>



Consultee	Summary of Responses	Where Response Addressed
	<p>will need to be undertaken to cover all parts of the site where turbines and associated infrastructure is proposed factoring in appropriate allowances for micro-siting.</p> <p>UKHab and NVC surveys have been undertaken for part of the site. As with the peat data additional survey work will need to be undertaken to cover all parts of the site where turbines and associated infrastructure are proposed factoring in appropriate allowances for micro-siting and buffer requirements.</p> <p>Detailed habitat surveys must use the NVC classification. It is important that the detailed survey is conducted in NVC and the results presented using the NVC.</p> <p>Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.</p>	Technical Appendix 10.3: Borrow Pit Appraisal
NatureScot	<p><u>Landscape and Visual</u></p> <p>In relation to the cumulative assessment, we advise the Craighead Wind Farm (Energy Consent Unit Reference: ECU00004738) is included given its location within the Ochil Hills to the west of the proposal and likely for potential significant effects. In addition, we consider that the Cleish Hills LLA and Forest LLA be scoped in given predicted visibility over these areas and also the likelihood for potential significant cumulative effects.</p> <p>We advise that the following viewpoints are included within the assessment to ensure that all potential significant effects, both, individually and cumulatively, are captured:</p> <ul style="list-style-type: none"> • Cowie Road at Easter Greenyards (NS82598980); • Chartershall Road (NS78928936); • Stirling Castle esplanade (NS79149395); 	Chapter 7: Landscape and Visual



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	<ul style="list-style-type: none"> Kersebonny Road (NS77329372); A811 near Gargunnoch (NS70059522) – in addition to proposed Viewpoint 2: Blair Drummond Castle/Safari Park; Consideration of another viewpoint from the carseland close to Stirling, e.g. the Stirling County Cricket Club ground. This would be representative of widespread visibility to the south east of Stirling and views from the A91; A viewpoint from the upper reaches of the popular Alva Glen walk, where the ZTV (although indistinct) appears to suggest there will be close visibility of blades if not hubs; Given the importance of the Ochils skyline, the provision of wirelines for all nearby villages that will have visibility of blades and/or hubs; and Sequential wirelines covering areas of visibility from the M9/A9 corridor. In addition, we advise that a viewpoint is included from the Cleish Hills to ensure that the cumulative effects of the proposal are captured given that the distinctive Ochil Hills are currently experiencing a high interest from wind energy development proposals. 	
	<p><u>Ecology</u></p> <p>We advise that habitat surveys should include; Phase 1 (or EUNIS) habitat survey, National Vegetation Classification (NVC) survey (of habitats listed on Annex 1 of the EC Habitats Directive and UK Biodiversity Action Plan (UKBAP) Priority Habitats), accompanied by supporting vegetation quadrat information. Surveys should also include records of any rare and scarce plant species.</p>	<p>Chapter 8: Ecology</p> <p>Technical Appendix 8.1: UKHab and NVC Habitat Report</p>
	<p><u>Ornithology</u></p> <p>We have previously provided advice in relation to the scope and extent of the surveys which has been taken into account within the scoping report. We stand by our advice that vantage point, breeding wader and breeding raptor surveys were continued for a second year (April 2022 – March 2023). We agreed that black grouse surveys were not required in 2022 due to lack of suitable habitat and observations in 2021 and the adjacent sites not recording black grouse present since 2008. We advised that the applicant liaise with the RSPB and the local Raptor Monitoring Group for</p>	<p>Chapter 9: Ornithology</p>



Consultee	Summary of Responses	Where Response Addressed
	any data held on any protected or annex species and are pleased the applicant will consult these two groups. Any data provided by these groups should be presented with the full assessment for the proposal in the EIA report.	
	<p><u>Hydrology and soils</u></p> <p>The majority of the proposal, except for the access route, is located on Class 1 peatland and this should be an important consideration in the EIA report. The applicant should include measures which will seek to avoid both direct and indirect impacts to the most sensitive and high quality peatland habitats and this should be considered as part of the site design. Following the findings of the proposed additional peat depth probing survey, the applicant should consider mitigation such as revising the proposed site design to exclude and protect areas of deep peat and priority peatland habitats, mitigation should be detailed where impacts on peatland habitats are unavoidable. Measures to minimise peat disturbance should be considered during the excavation, construction and decommissioning phases of the proposal. We recommend consideration of degraded peatland areas which could be included as part of a Habitat Management Plan which may be used as compensatory and enhancement measures.</p> <p>We are supportive of the inclusion of a Peat Management Plan. This should include methods to restore and improve the condition of existing peatland habitat to compensate for unavoidable residual effects. Habitat enhancement should go beyond compensation and should provide overall positive effects or net benefit for peatland interest.</p>	<p>Chapter 10: Hydrology, Hydrogeology and Geology</p> <p>TA 10.2: Peat Management Plan</p>
	<p><u>Decommissioning</u></p> <p>However, as decommissioning and redevelopment of the site are both potential options, the EIA process should consider the implications and assess the likely impacts of both, as these are likely to be very different and may influence how the current proposal is developed.</p>	<p>Chapter 3: Description of Development.</p> <p>Technical Appendix 3.1: Outline CEMP</p>
Aberdeen Airport	This proposal is located outwith the consultation zone for Aberdeen Airport. As such we have no comment to make and need not be consulted further.	N/A



Consultee	Summary of Responses	Where Response Addressed
BT Group	We have studied this Windburn Wind Farm scoping proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that, the Turbine Locations indicated should not cause interference to BT's current and presently planned radio network. BT requires 100m minimum clearance from any structure to the radio link path.	Chapter 14: Other Issues
Blackford Community Council	<p>We note that the total height of the Turbines has been reduced following consultation with other organisations. However the total height of the turbines should not exceed those of the Burnfoot Wind Farm (and extensions).</p> <p>We note that there are no wire frames of the development included for Blackford Village. We are extremely disappointed that we have not been included whilst other communities further away have been given that information.</p> <p>The proposed site entrance and access to the development is a road used by walkers, cyclists and cars. In the event of closures of the A9 this route provides an essential link for all the communities served by the road. This use should be include in any road traffic plan that is written for the site traffic. A potential alternative access from the A823 at Frandy via the existing Burnfoot site would be a better route, as the use by others is significantly lower.</p> <p>Rather than yet another fund with more forms to be filled by the same small community groups, money being paid to an existing funds would be simpler and easier for all the communities. Foundation Scotland provide the administration for the Blackford Community fund and can enable the fund to receive the income the same as it does for the income we receive from EDF for the Burnfoot site.</p>	<p>Chapter 2: Site Description and Design Evolution</p> <p>Chapter 7: Landscape and Visual</p> <p>Chapter 12: Traffic and Transport</p> <p>Chapter 13: Socio-economics, Tourism, Recreation and Land Use</p>
Dunblane Community Council	It is noted that Dunblane Community Council which includes the areas of Ashfield and Kinbuck is not included in the list for consultation (section 13.2 of the EIA Scoping document). Whilst the neighbouring authorities are noted as Local Areas of Interest. We would request that this Community Council be included in the consultation exercise as significant current and future tourist and recreational assets are likely to be impacted. We have a significant boundary with the proposed site.	Chapter 6: Scoping and Consultation



Consultee	Summary of Responses	Where Response Addressed
	<p>Dunblane Community Council list nearby tourism receptors with the potential to be impacted by the Proposed development, and ask that “The scope of consultation must consider both the impact on current tourist and recreational activities and the scope to detract or enhance plans to further improve the contribution of such assets to the economic and social wellbeing of the Dunblane, Ashfield and Kinbuck Community Council area.</p> <p>Concerns raised regarding Site Access off the A9 at Blackford. We believe that serious consideration should be given to using the access roads for the adjacent Burnfoot windfarm with a new link through the Burnfoot site, this would eliminate the need for upgrading the existing A9 slip roads and use of the Sheriffmuir Road</p> <p>We ask that the Energy Consent Unit insists that mitigation of peat land damage and peatland restoration of the entire site, with agreements on stocking rates, is integral to the application succeeding.</p>	<p>Chapter 13: Socio-economics, Tourism, Recreation and Land Use.</p> <p>Chapter 2: Site Description and Design Evolution</p> <p>Chapter 12: Traffic and Transport.</p> <p>Chapter 10: Hydrology, Hydrogeology and Geology</p>
Menstrie Community Council	<p>It would be worth considering any options that could allow working across Council boundaries to maximise any potential long term projects.</p> <p>Has any consideration been taken of the methodology to contact recreational users? For example paragliders, riders, or local ramblers?</p> <p>What effects are there on Myreton or Ben Cleuch? We have worked hard to ensure Menstrie is a welcoming and suitable environment for walkers to start their route to Dumyat or into the Glens.</p> <p>Have local Scouts, Ramblers and Wanders as well as Community Councils been included?</p> <p>The bat survey is nearly two years old and while numbers recorded were low the number of species was high, should this survey be undertaken again?</p>	<p>Chapter 6: Scoping and Consultation</p> <p>Chapter 13: Socio-economics, Tourism, Recreation and Land Use</p> <p>Chapter 7: Landscape and Visual</p> <p>Chapter 8: Ecology</p>



Consultee	Summary of Responses	Where Response Addressed
Defence Infrastructure Organisation (DIO)	<p>The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.</p> <p>In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. As a minimum the MOD would require that the perimeter turbines are fitted with both 25cd visible and infra-red (IR) COMBI lighting.</p>	Chapter 14: Other Issues
Edinburgh Airport	<p>This proposal has been examined from an aerodrome safeguarding perspective and conflicts with safeguarding criteria. We therefore object to the development on the following grounds:</p> <p><u>Instrument Flight Procedure (IFP) Assessment</u></p> <p>No turbine tower of any turbine may be erected, unless and until such time as the Scottish Ministers receive confirmation from the Airport Operator in writing that: (a) an IFP Assessment has demonstrated that an IFP Scheme is not required; or (b) if an IFP Scheme is required such a scheme has been approved by the Airport Operator; and (c) if an IFP Scheme is required the Civil Aviation Authority has evidenced its approval to the Airport Operator of the IFP Scheme (if such approval is required); and (d) if an IFP Scheme is required the scheme is accepted by NATS AIS for implementation through the AIRAC Cycle (or any successor publication) (where applicable) and is available for use by aircraft.</p>	<p>Chapter 14: Other Issues</p> <p>Technical Appendix 14.3 and 13.4: IFP Assessment</p>
Friends of the Ochils	<p>We have serious concerns about the visibility of the proposed turbines from a number of viewpoints to the south of the Ochils such as VPs 4, 6, 9 and 10. For the first time, turbines in and around Burnfoot Hill would be visible above the iconic scarp slope of the Ochils to the detriment of the visual amenity afforded by the hill range.</p>	<p>Chapter 7: Landscape and Visual</p> <p>Chapter 14: Other Issues</p>



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	<p>We would wish to see an additional viewpoint selected to the east of the proposed development showing the cumulative impact of that development with other Ochils windfarms such as Greenknowes. We would propose Innerdownie as that viewpoint.</p> <p>Consideration requires to be given to the possible cumulative impact of the proposed windfarm with the Beaully to Denny powerline.</p> <p>The Scoping Report requires to take into account the proposed Craighead Windfarm (ref: ECU00004738) adjacent to the proposed Brunt Hill Windfarm (ref: ECU00004654).</p> <p>Although described as separate windfarms in, for example, para 6.5.4, the Rhodders Windfarm, the Burnfoot Hill East and the Burnfoot Hill North Windfarms are all extensions of the original Burnfoot Hill Windfarm and all four require to be considered as a single windfarm. The proposed Windburn Windfarm can only be seen as yet a further extension to this single windfarm.</p> <p>Consideration should be given to scoping in rather than scoping out those LCT and Designated Landscapes where the effects are described as “unlikely to be significant”. This lack of certainty suggests that the precautionary principle should apply and that they should be scoped in and not out.</p> <p>In relation to para 14.8 on Climate and Carbon Balance, we would wish to see an analysis of the impact of peat restoration on the carbon balance. A peat restoration feasibility study of Alva Moss, carried out in 2020 through funding provided by NatureScot Peatland Action, demonstrated that Alva Moss was suitable for peat restoration. We would wish to see an analysis of the impact of the proposed windfarm on peat restoration across the site. If, as a result of the windfarm development, peat restoration on Alva Moss cannot go ahead, the payback time will be longer than if peat restoration can proceed. No matter what the outcome of any application might be, peat restoration requires to be taken into account in any carbon balance assessment in the EIA.</p>	



Consultee	Summary of Responses	Where Response Addressed
Glasgow Airport	<p>The site is outwith the obstacle limitation surfaces for Glasgow Airport;</p> <p>It is within the radar and instrument flight procedures safeguarding areas and may impact. Detailed assessments will be required.</p> <p>Our position with regard to this proposal will only be confirmed once the turbine details are finalized and we have been consulted on a full planning application.</p>	Chapter 14: Other Issues
Glasgow Prestwick Airport	The proposed development lies outside the GPA safeguarding area and as such we would have no comment or valid objection to make.	N/A
Highland and Islands Airport Limited	Our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Dundee Airport. Highlands and Islands Airports Limited has no objections to the proposal.	N/A
Joint Radio Company	This proposal is *cleared* with respect to radio link infrastructure operated by the local energy networks. In the case of this proposed wind energy development, JRC does not foresee any potential problems A58 based on known interference scenarios and the data you have provided.	Chapter 14: Other Issues
Mobile Broadband Network Limited (MBNL)	I can confirm that there are no infringement issues with the EE/3UK mobile microwave network from the proposed turbine cluster at the coordinates provided in the relevant document.	Chapter 14: Other Issues
NATS Safeguarding	<p>The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal.</p> <p><u>Predicted Impact on Lowther RADAR</u></p> <p>It has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.</p> <p><u>Predicted Impact on Kincardine RADAR</u></p>	Chapter 14: Other Issues



Consultee	Summary of Responses	Where Response Addressed
	<p>It has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.</p> <p><u>En-route operational assessment of RADAR impact</u> Unacceptable impact to operations at Prestwick Centre ATC.</p>	
Office for Nuclear Regulation (ONR)	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	N/A
RSPB Scotland	<p><u>Policy</u> The scoping report states that the key NPF4 policies to be considered are Policy 1, Policy 2 and Policy 11. We believe that equal weight must be given to Policy 3 – Biodiversity. Policy 3 requires that development proposals contribute to the enhancement of biodiversity.</p> <p><u>Ornithology</u> In general, the ornithological chapter of the EIA should consider all the components of the proposal including access roads (including the route on public roads to get the turbines on site), on-site tracks, borrow pits, drainage, grid connection, substation, and temporary construction buildings/storage compounds. Disturbance, displacement (including barrier effects), loss of suitable habitat (breeding, wintering and foraging) and collision risk should be assessed for all species.</p> <p>Information within the EIA report must demonstrate that the survey data are adequate, robust, and accurate. The following should be included:</p> <ul style="list-style-type: none"> • Full information on the Vantage Point (VP) Survey work undertaken, including dates, times, and weather conditions • Maps showing VP locations that also denote viewsheds • Maps showing raptor foraging areas and flights • Worked example(s) of collision risk calculations 	<p>Chapter 9: Ornithology</p> <p>TA 8.4: Outline HMP</p>



Consultee	Summary of Responses	Where Response Addressed
	<ul style="list-style-type: none"> Provision of raw data in order for independent verification of collision risk calculations <p>The EIA Report should also include post-construction monitoring for collision mortality and breeding birds.</p> <p><u>Habitat Management Plan</u></p> <p>We would expect the HMP to include proposals for mitigation, compensation and enhancement of habitats and species on site and also discuss opportunities for development and enhancement of wider Nature Networks.</p>	
Scottish Forestry	<p>I have adjusted our standard response to take account of Forestry/ woodlands being covered under Other Environmental issues in Chapter 14. On this occasion this is acceptable as the area of woodland affected is so small. However, the developer should still make all efforts to avoid woodland removal if at all possible.</p> <p>Woodland removal should be kept to a minimum and where woodland is felled it should be replanted.</p> <p>The EIA Report should include a section within Chapter 14 on 'Woodland management and tree felling', (a forest plan) prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs. Details of the proposed mitigation measures must be included in the EIA Report, not left to post-consent habitat management plans (or others) to decide and implement.</p> <p>A long term forest plan should be provided as part of the EIA Report (as a technical appendix for context) to give a strategic vision to deliver environmental and social benefits through sustainable forest management and describes the major forest operations over a 20 years period.</p>	<p>Chapter 14: Other Issues</p> <p>TA 3.2: Forestry</p>
Scottish Water	<p>Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced.</p>	<p>Chapter 10: Hydrology, Hydrogeology and Geology</p>



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Drinking Water Protected Areas</u></p> <p>A review of our records indicates that the proposed activity falls partly within a drinking water catchment where a Scottish Water abstraction is located. The Upper Glendevon Reservoir supplies Glendevon Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. The activity is sufficient distance from the intake that it is likely to be low risk, however water quality must be protected, and we expect appropriate mitigations to be implemented. Thought must be given to how site run off will be managed and how the risks from hydrocarbon spills will be mitigated against.</p> <p>The fact that this area is located within a drinking water catchment should be noted in future documentation. Also, anyone working on site should be made aware of this during site inductions.</p> <p>We would appreciate further involvement at the more detailed design stages of this application. Although the activity should be low risk, we note that there is a lot of activity taking place in this DWPA and need to be fully informed of all developments and require notification prior to any work commencing on site. At least 3 months in advance of any work taking place we must be notified at protectdwsources@scottishwater.co.uk this will allow us to establish if a site visit would be beneficial for the parties involved in this development.</p>	
ScotWays	<p><u>Scotways Records</u></p> <p>The enclosed map shows that right of way TP193 as recorded in the National Catalogue of Rights of Way (CROW) crosses or is close to the application site as shown on Figure 1 Site Location.</p> <p>The enclosed map shows the Heritage Paths project promotes a route, Tillicoultry to Blackford Hill Track [HP353], for its historic interest. This old route crosses or is close to the application site as shown on Figure 1 Site Location.</p>	Chapter 13: Socio-economics, Tourism, Recreation, and Land Use.



Consultee	Summary of Responses	Where Response Addressed
	<p>The enclosed map shows that our book Scottish Hill Tracks describes route 131 Tillicoultry to Blackford or Gleneagles [HT724] which crosses or is close to the application site as shown on Figure 1 Site Location.</p> <p><u>Cumulative Impact</u> As ScotWays is aware of a number of wind turbine proposed in this general area, we are particularly concerned that the cumulative impact of these proposed developments is taken into account.</p> <p><u>Comment</u> We suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.</p>	
Scottish Wildlife Trust	<p><u>Alva Moss Candidate Local Nature Conservation Site</u> The site of this Windfarm includes most or all of Alva Moss Candidate Local Nature Conservation Site (LNCS), proposed for adoption / designation by Clackmannanshire Council. The Central Point Grid Reference for Alva Moss LNCS is NN885022, not far from the Central Point Grid Reference for Windburn Wind Farm Site. The area of Alva Moss Candidate LNCS is 400.29ha.</p> <p>The Scoping Report for the EIA does not list the existence of this Candidate LNCS in the comments raised earlier by Clackmannanshire Council. While not a Statutory Designation, due regard should nevertheless be paid to LNCSs.</p> <p>While Alva Moss has not yet been fully adopted / designated by Clackmannanshire Council, it has been fully surveyed for biodiversity and was assessed in 2021 as meeting the criteria for adoption / designation. It has still to go through the final stage of this process, namely presentation to the Council.</p> <p>As far as we can tell without facilities for layering the map of the proposed locations of the turbines, it appears that many or all of the turbines are within Alva Moss Candidate LNCS.</p>	Chapter 8: Ecology



Consultee	Summary of Responses	Where Response Addressed
	<p><u>Peatland Restoration</u></p> <p>We have heard recently that NatureScot has been looking into the feasibility of peatland restoration on Alva Moss, concluding that it is feasible. This consideration should be an important elements of the Scoping required for the EIA, including the interaction, positive or negative, between the proposals for this Wind Farm, and the peatlands / peatland restoration of Alva Moss.</p> <p><u>Infrastructure</u></p> <p>Wind Farm infrastructure like Access Tracks, Bridges / Culverts, Turbine Standing Areas are a significant concern with Wind Farms, especially so regarding peat soils, as on this Site. These infrastructure elements should be an important element of the Ecology part of the EIA, assessing the impact on the hydrology of the Site.</p> <p><u>Specific Wildlife Information</u></p> <p>Black Grouse are known to forage for food on Mickle Corum in spring - This information for Black Grouse should be considered within the Ecology part of the EIA.</p> <p>There are historic records on the Proposal Site of Mountain Hare, a European Protected Species and on the Scottish Biodiversity List under 'Conservation Action Needed', most recently in 2006, though only a single record in that year. This Species, though possibly not still present within the Proposal Site should nevertheless be considered within the Ecology part of the EIA, as it may be a potential focus for conservation as part of mitigations, if the proposal goes ahead.</p> <p>There is a wide range of Raptors recorded on NBN Atlas Scotland as using the site, including in recent years. This list includes Species of Conservation Concern:</p> <ul style="list-style-type: none"> • Short-eared Owl, on Scottish Biodiversity List – 'Avoid Negative Impact' • Merlin, on Scottish Biodiversity List – 'Avoid Negative Impact' • Peregrine Falcon, on Scottish Biodiversity List – 'Avoid Negative Impact' and a Schedule 1 bird 	



Consultee	Summary of Responses	Where Response Addressed
	<ul style="list-style-type: none"> Kestrel on Scottish Biodiversity List – ‘Conservation Action Needed’ Barn Owl on Scottish Biodiversity List – ‘Conservation Action Needed’ and a Schedule 1 bird <p>A raptor survey designed for at least these species of raptors should be carried out to contribute to the Ecology part of the EIA, if this has not already been completed.</p> <p>There is a known isolated population of small Brown Trout in the high feeder waters of The R Devon, unable to pass downstream to the sea to complete their natural lifecycle due to barriers downstream. To the best of our knowledge, this species is in the Finglen Burn. Its rarity as an isolated population makes it a notable biodiversity feature of the Site, therefore needing consideration within the Ecology part of EIA. At the very least, this species needs the proposals to avoid a negative impact on water quality.</p> <p>There are records on NBN Atlas Scotland of Small Pearl bordered Fritillary butterflies within 5k of the centre of the Alva Moss LNCS. The needs of this Butterfly species should be included within the Ecology section of the EIA. It may be a potential focus for conservation as part of mitigations, if the proposal goes ahead.</p> <p><u>Conclusion</u></p> <p>It seems inevitable that a large windfarm of the kind proposed, with turbines much taller than existing turbines in the area, and with an unavoidably large amount of infrastructure, will have a very significant adverse impact the ecological integrity of Alva Moss Candidate LNCS or on the qualities it has been cited for. There is therefore a need for protection of this Candidate LNCS. This should be a very significant element of the EIA, covering all the valuable habitats and valuable species that need consideration. If the proposal is nevertheless to go ahead, significant, long-term conservation measures for Biodiversity will be required as part of mitigations, both for construction phase and for operation phase. That would be in addition to any social mitigations for local communities.</p>	
Telefonica	We do not currently have any microwave links in the vicinity of this deployment	Chapter 14: Other Issues



Consultee	Summary of Responses	Where Response Addressed
Transport Scotland	<p>The SR states that it is proposed to place an Automatic Traffic Counter (ATC) close to the proposed site access, with a second ATC placed on the A9(T) (if possible) in an appropriate location. While we consider this appropriate, we can confirm that there are two Transport Scotland traffic counters on the A9(T), one at Greenloaning and one just south of the B8081 Blackford junction. Traffic data from these sites can be made available on request. We would also add that base traffic data will require to be factored to the construction year flows, using National Road Traffic Forecasts (NRTF) Low Growth.</p> <p>Transport Scotland would state that should the impact of development generated traffic exceed the IEMA thresholds on the A9(T) road link then it will also require to be further assessed.</p> <p><u>ALRA</u></p> <p>Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. The ALRA should identify key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route. We would also add that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager prior to the movement of any abnormal load.</p>	<p>Chapter 12: Traffic and Transport</p> <p>Technical Appendix 12.1: Abnormal Load Route Assessment</p>
Vodafone	I have plotted the below wind turbine locations which I found on document ECU00004782 and can confirm with have no links in that area that will be impacted by this development.	Chapter 14: Other Issues
Virgin Media – O2	We do not currently have any microwave links in the vicinity of this deployment	Chapter 14: Other Issues



