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## 6. EIA Methodology, Scoping and Consultation

### 6.1. Introduction

- 6.1.1. Chapter 6 of the EIA Report (November 2018) describes the EIA process for the Proposed Development. The process and principles outlined in that chapter have been carried through to the post submission stage and remain valid for the Revised Development and the preparation of the AEI.
- 6.1.2. The revisions to the Proposed Development which are considered within this AEI related to the Revised Development presented in **AEI Figure 4.1** which includes the removal of T7 and T11, and the re-siting of other turbines as detailed in Chapter 4 of this AEI.
- 6.1.3. Environmental effects have therefore already been considered for a larger scale development scenario than that considered within this AEI. The AEI focusses on outlining the change in predicted effects arising from the revisions to the Proposed Development.

### 6.2. Consultation

- 6.1.4. Details of the pre-application consultation are provided in Section 6.2 of the EIA Report (November 2018) and within the individual technical chapters.
- 6.1.5. AEI Table 6.1 presents a summary of the post submission responses received. Where amendments to the scheme have been requested, the Applicant has aimed to engage in constructive consultation with those consultees to identify solutions where practical and possible.

**AEI Table 6.1: Post Submission Consultation Responses**

| Organisation                           | Date                        | Response  |
|--|-----------------------------|---|
| Scottish Environment Protection Agency | 14 <sup>th</sup> March 2019 | Holding objection, pending further justification as to why T4, T6, T8, T9, T10, T13 and T16 were located in areas of deep peat.   |
| Scottish Natural Heritage              | 20 <sup>th</sup> March 2019 | No objection; have raised concerns over landscape and visual impacts across the Galloway Hills RSA, and cumulative impacts with Longburn Wind farm, should it be consented.                   |
| Historic Environment Scotland          | 7 <sup>th</sup> March 2019  | Objected to the application due to the potential to have an adverse impact on the integrity of setting of two scheduled monuments; Craigengillan (SM 2238) Stroanfreggan Craig Fort (SM 1095) |

| <b>Organisation</b>   | <b>Date</b>                    | <b>Response</b>  |
|---|--------------------------------|--|
| Royal Society for the Protection of Birds                     | 1 <sup>st</sup> March 2019     | No objection, however recommend mitigation to minimise effects on black grouse and deep peat habitat.  |
| Radio Network Protection (BT)                                 | 19 <sup>th</sup> December 2018 | No objection   |
| Carsphairn Community Woodland                                 | 17 <sup>th</sup> March 2019    | Object to the Proposed Development on the grounds on unacceptable impacts on the landscape, the local economy, traffic, and tourism.   |
| Carsphairn Community Council                                  | 25 <sup>th</sup> March 2019    | Object on the grounds of residential amenity, cumulative impacts, landscape and visual impacts, cultural heritage, and traffic and transport.  |
| Forestry Commission Scotland (now Forestry and Land Scotland) | 21 <sup>st</sup> March 2019    | No objection   |
| Joint Radio Company   | 18 <sup>th</sup> December 2018 | No objection   |
| Fisheries Management Scotland                                 | 20 <sup>th</sup> December 2018 | No objection, however recommend that the developers should consult the local district salmon fishery board and fisheries trust to discuss the potential impacts on fish and fish habitats, and how these might be mitigated. |
| Glasgow Airport Safeguarding                                  | 20 <sup>th</sup> December 2018 | No objection   |
| Ministry of Defence   | 16 <sup>th</sup> January 2019  | No objection   |
| Ironside Farrar   | 15 <sup>th</sup> March 2019    | Requests a resubmission of the PSRA due to insufficient baseline in the desk study and from the field surveys.   |
| Transport Scotland  | 12 <sup>th</sup> February 2019 | No objection   |
| National Air Traffic Services                                 | 15 <sup>th</sup> January 2019  | A technical impact is anticipated, the proposed development is deemed to be unacceptable.  |
| Scottish Water  | 27 <sup>th</sup> December 2018 | No objection   |
| VisitScotland   | 27 <sup>th</sup> December 2018 | Highlight that the tourism impact statements should not be diminished, and suggest an independent tourism impact assessment be carried out.  |

| Organisation            | Date                           | Response  |
|-------------------------|--------------------------------|---|
| Crown Estate Scotland   | 20 <sup>th</sup> February 2019 | No objection  |
| Marine Scotland         | 25 <sup>th</sup> February 2019 | Recommends a fish population monitoring programme to ensure mitigation measures are effective.  |
| ScotWays                | 27 <sup>th</sup> February 2019 | Concerns about impacts on recreational amenity and views from the Southern Upland Way.  |
| Mountaineering Scotland | 18 <sup>th</sup> January 2019  | Object to the proposal on the grounds of visual impact and recreational detriment, particularly on the Cairnsmore of Carsphairn Corbett as a significant hill-walking resource, and on the Southern Upland Way.   |
| British Horse Society   | 21 <sup>st</sup> January 2019  | Provided standard advice on minimising impacts and maximising the benefits of equestrian access.  |
| Council Archaeologist   | 29 <sup>th</sup> April 2019    | The DGC Archaeologist raised similar concerns to HES with regards to potential effects upon Craigengillan cairn and Stroanfreggan Craig Fort and identified a previously unknown feature (burnt mound, MDG27135) in the vicinity of Craigengillan cairn and T7. |

| Organisation                       | Date                         | Response  |
|------------------------------------|------------------------------|---|
| Council Landscape (draft response) | 22 <sup>nd</sup> August 2019 | <p>The Landscape Officer requests Further Environmental Information (FEI) which relates to graphical representation of visualisations and cumulative visualisations. However, notwithstanding the above, the Landscape Officer provides the following draft feedback:</p> <p>My initial feedback is that the Shepherds' Rig site has no scope for development of the suggested scale; both turbine height and the spread of the wind farm are problematic. The site would be highly sensitive to even a substantially reduced scheme due to the spatial and visual relationship it has to the Carsphairn Hills, as well as nearby sensitive landscapes, the Head of the Ken valley (LCT 4), and the Upper Glenkens (LCT 9). With respect to setting and visual issues here would be implications for the Galloway Hills Regional Scenic Area (RSA). There are also cumulative issues in relation to the strategic wind farm pattern, as well as undetermined schemes.</p> |

- 6.1.6. In response to the above consultation responses, the project design has been amended in order to directly address the concerns raised by HES and SEPA and with regards Cultural Heritage and Geology & Peat with further clarification in the relevant technical chapters. Details of the Revised Development are provided in AEI Chapter 4. The Council Landscape Officer's request for some additional visualisation information has been carefully considered. Some aspects have been now been provided such as the 360 degree cumulative wirelines from each viewpoint. A response has been sent to the council explaining why certain other elements of the requested information has not been provided.
- 6.1.7. Fifty public responses have been received by the ECU in relation to the scheme.
- 6.1.8. AEI Table 6.2 below shows the issues raised by these representations, all of which object to the scheme and feel that the impacts on the following topics will negatively outweigh the benefits.

**AEI Table 6.2 Public Response Topics**

| Topic                               | % of comments |
|-------------------------------------|---------------|
| Landscape                           | 98            |
| Habitat loss and impact on wildlife | 76            |
| Noise impacts                       | 74            |
| Historic environment impacts        | 61            |
| Cumulative impact                   | 33            |
| Traffic impacts                     | 28            |
| Loss of residential amenity         | 28            |
| Tourism impacts                     | 22            |
| Local economy                       | 15            |
| Ineffective planning process        | 4             |
| Property devaluation                | 2             |
| Light pollution                     | 2             |
| Water quality                       | 2             |

6.1.9. The most common effect raised is the perceived negative impact on the local landscape, increased with the cumulative effect of other schemes in the area (both operational and in planning). It is noted that some visitors to the area may not appear in official visitor numbers since their visits are to friends and family in privately owned properties not registered as tourism accommodation.

6.1.10. Loss of habitat, noise levels, and impacts on heritage assets also featured in these representations, followed by negative impacts from increased traffic movements, loss of residential amenity, and impacts on tourism, mainly due to the issues noted above.

### **6.3. EIA Methodology**

6.1.11. The AEI has been prepared following a systematic approach to EIA and project design following the principles outlined within Chapter 6 of the EIA Report (November 2018). Since submission of the application and the EIA, the further key elements have been:

- Consultation on the application and EIA;
- Revision of project design with input from the EIA team;
- Further consultation on the revised Development;
- Preparation of the AEI; and
- Submission of the AEI and required advertising procedures.