



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

For the attention of Gordon Mooney

Your ref: 10/02132/FUL

Our ref: CNS/REN/WF/Corrimony

14 September 2010

Dear Mr Mooney

Town & Country Planning (Scotland) Act 1997 Proposal to erect 5 x 2MW wind turbines on the hill ground of Corrimony Farm, Glenurquhart, Inverness

Thank you for your e-mail requesting comments from us in regard to the above application, and for agreeing to an extension to the deadline for comment. This was in part due to both practical and technical difficulties accessing all the documents associated with this application.

1. Background

We have been aware of this development for a number of years and have provided comment to the applicant on a number of occasions, in particular in our pre-scoping letter dated 22 January 2007 and our scoping response dated 25 January 2008.

2. SNH position

It is our opinion that some fundamental information is missing from this application in order to fully assess this application in respect of some wider countryside issues. We offer advice and a number of recommendations, including the provision of further information, as detailed in Annex 1 to safeguard protected species and habitats.

3. General comments on the application and Environmental Statement

Some of the content is very good, but other aspects are inaccurate, superficial, and inconsistent or at times absent. Much of the information associated with the application is vague including some fundamental issues including a clear map and statement which define precisely the area of land included in the development area, and the infrastructure included in the application.

Figure 2.1 Location Plan (Page 9) and Figure 2.2 Site Plan (Page 10), while giving some indication of what is proposed, are very incomplete. Only the plan named on the Highland Council Website as 'Drawing Location/Site Plan (a3) and entitled "Wind Energy Project Map", but unnumbered, identifies all the elements of the proposal, although only the turbine envelope is described as the "Site Planning Area". We have assumed all land use changes described in the reports are part of the Planning Application.

The turbine locations on Figure 2.1 Location Plan (Page 9) and Figure 2.2 Site Plan (Page 10) are not the same as those on 'Drawing Location/Site Plan (a3) and entitled "Wind Energy Project Map".



INVESTOR IN PEOPLE

Scottish Natural Heritage, East Highland Area, Fodderty Way, Dingwall Business Park, Dingwall,
Ross-shire. IV15 9XB
Tel: 01349 865333 Fax: 01349 865609 Website: www.snh.org.uk

Dualchas Nàdair na h-Alba, Sgìre Taobh Sear Na Gaidhealtachd, Slighe Fodhraitidh, Pàirce Gnìomhachas
Inbhir Pheofharain, Inbhir Pheofharain. IV15 9XB
Fòn: 01349 865333 Facs: 01349 865609 Làrach-Linn: www.snh.org.uk

Furthermore, there appears to be no map identifying the 'Site Boundary'. 'Drawing Location/Site Plan (a3) and entitled "Wind Energy Project Map" does show an area around the turbines called the "Site planning area" – but as it excludes most the access track and cable route, all the borrow pits and the area of planned woodland expansion, we presume it is incomplete.

The provision of this information, in a clear and precise manner would have assisted us greatly in our assessment of the application and significantly reduced the amount of time spent dealing with this proposal.

4. Concluding remarks

We ask to be advised at the earliest possible stage about any proposed modifications, conditions or agreements relevant to our interests.

Please contact me at the office below if you need any further information or advice from us in relation to this proposal. We would be grateful if you could let us know of your decision in due course or of any further changes to the proposal which would be relevant to our interests.

Yours sincerely

Liz McLachlan
Area Officer
East Highland
liz.mclachlan@snh.gov.uk

Annex 1 – Comments on the Glenurquhart and Strathglass Wind Energy Project

1. Appraisal of impacts on designated sites

Section 1 part 4.2 of the ES states that “there are no sites designated for their nature conservation interests within 10km of the site”, this statement is inaccurate as our sitelink facility, which is available on our website illustrates there are in fact 6 sites within 10km, designated for their ecological interest as well as the Glen Affric to Strathconon proposed Special Protection Area (SPA) which is mentioned in the ES.

The designated sites which have an ecological interest and which should also have been assessed as part of the EIA process are:

- a) Glen Affric National Nature Reserve (NNR)
- b) River Moriston Special Area of Conservation (SAC)
- c) Strathglass Complex SAC
- d) Glen Affric Site of Special Scientific Interest (SSSI)
- e) Levishe Woods SSSI
- f) Strathglass Geological Conservation Review (GCR) Site

In addition to the above, West Inverness-shire Lochs SPA and SSSI, and North Inverness Lochs SPA, Balnagrantach SSSI and Dubh Loch SSSI are all close by, although outwith a 10km radius, and are designated for bird species which could be affected by this proposal.

In addition to the above sites designated for their ecological interest there are also 2 National Scenic Areas (NSA's), Glen Affric and Glen Strathfarrar, which should also have been considered. Our comments on the landscape impacts within the NSA's are included in the section below on Landscape and Visual Impact Assessment.

1.1 European Sites

The legislative requirements for European sites can be found on our website at the following address; <http://www.snh.gov.uk/docs/A423286.pdf>

1.1.1 River Moriston SAC and Strathglass Complex SAC

Based on our information and knowledge of the sites, we consider it is unlikely that the proposal will have a significant effect on any of the qualifying interests of these sites either directly or indirectly, due to the nature of the sites interests' and a lack of connectivity to the proposed development. In our view an appropriate assessment is not required.

1.1.2 West Inverness-shire Lochs SPA and North Inverness Lochs SPA

A limited assessment of the impacts of the proposed wind farm on these sites is included in the ES. Based on our information and knowledge of the features of these sites it is unlikely the wind farm will cause any significant effects, therefore our advice is that an appropriate assessment is not required.

1.1.3 Glen Affric to Strathconon pSPA

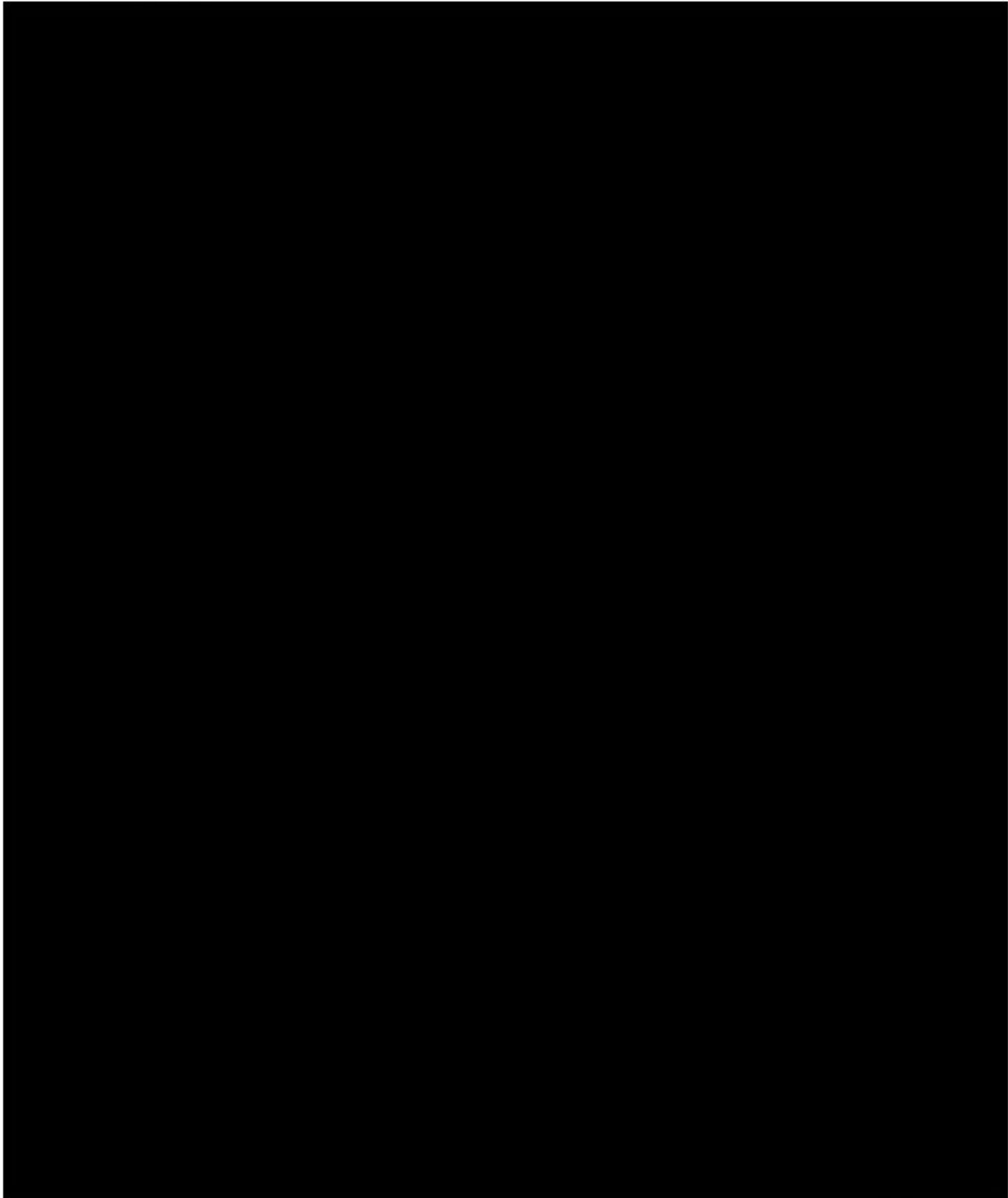
Again only a limited assessment was done of the impacts of the development on this proposed SPA. When we identified the boundary of the site it included the maximum theoretical territory size for golden eagles, a 6km radius. Corrimony is only 5km from the SPA but there is no extant eagle territory which could bridge the gap between the wind farm and the SPA. Connectivity between the wind farm and the pSPA is unlikely, therefore the wind farm is unlikely to cause any significant effect and an appropriate assessment is not required.

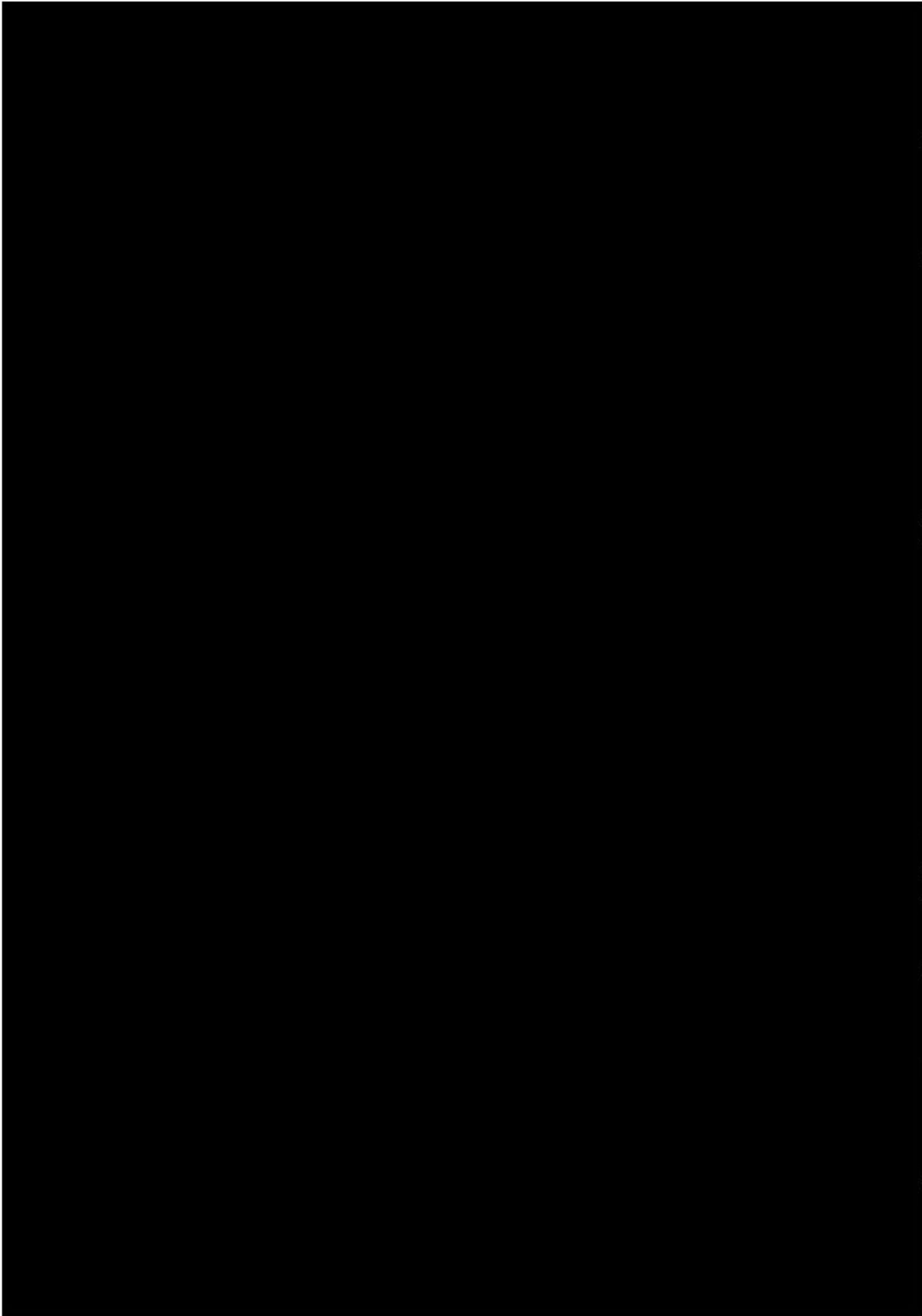
1.2 National Designations (non landscape)

Sites of Special Scientific Interest and GCR Site

Based on our knowledge and information we consider it is unlikely this development will have an adverse impact on the features of the sites listed as a, d, e and f above due to the nature of the identified features of the sites.

The impacts on West Inverness-shire Lochs SSSI, Balnagrantach SSSI and Dubh Lochs SSSI are discussed above in respect of West Inverness-shire Lochs SPA and North Inverness Lochs SPA.





1

d

-

e

s

t

n

3.4 Impacts on Schedule 1 species in the wider countryside

The main schedule 1 species in the vicinity of the wind farm is black grouse. Providing the suggested mitigation in the ES is implemented there should be no significant impact on this species.

4. Appraisal of impacts on habitats

The survey methods, habitat descriptions, mapping detail and habitat valuation are to a very high standard unlike other aspects of the ES.

Section 2.3.1 describes the habitat through which the cable route will pass. Elsewhere (Section 1, page 39) it is described as disturbing a zone 5m wide, but without more information describing the methodology it is not possible for us to confirm this. It seems unlikely that the corridor will be the same irrespective of the habitat through which it passes. We also note that the route follows a path; however, the implications of disturbing that path do not appear to be described. **We recommend additional information is obtained relating to the construction of the cable route and the implications of following the path in order that it can confirm, or otherwise assess, the implications for species, habitat and recreational interests.**

Section 2.3.3 of the ES indicates that a small pool close to Turbine 4 may be lost under the hardstanding. This is unfortunate, but not critical. However, it does draw attention to some uncertainty about the location of the hardstanding for Turbine 4 and indeed other elements of the infrastructure.

'Drawing Location/Site Plan (a3) and entitled "Wind Energy Project Map" shows the hardstanding for Turbine 4 as lying on the inside of the track loop. However, Figure 3, Page 14, Section 5 Geology/Hydrology shows it as on the outside of the track loop. The vegetation maps associated with the Ecology section do not show a location for the hardstanding so it is not clear which location was considered in concluding that a pool would be affected.

While it is appreciated that plans at this stage cannot be absolutely precise, **we strongly recommend that a single, definitive plan is prepared and that this used to guide the development. Agreed micro-siting tolerances should then be used at the construction phase to reduce environmental impacts.**

Section 2.4.2 describes proposals to plant 50 ha of native pinewood "as part of the overall development". This confirms the statement on page 40 of the Non-technical Summary and Project Description that "an integral part of the development proposal is to plant a further 50 hectares of native pine and broad-leaved trees". While expansion of the native woodland in this general area may well be beneficial from a biodiversity perspective, the rationale for including it as part of this development proposal is not clear, as tables 6 & 7 indicate the main habitat losses resulting from construction of the wind farm infrastructure are to wet heath, dry heath and bog. The loss of wet and dry heath resulting from the woodland proposal is considerably greater, although there is no evidence to suggest that any vegetation survey was undertaken in the proposed tree planting area.

We recommend clarification of the status of this woodland proposal within the development is sought. If it is to be an integral part of the proposal, we recommend the impact of the woodland proposal should be assessed and if necessary suitable mitigation measures agreed. We also recommend that Forestry Commission Scotland is consulted.

In the same section the ES states 'it is taken that two borrow pits and the redundant stretch of track would be reinstated with deep peat as blanket bog'. This is not the only reference to reinstating a redundant stretch of track, but it is not clear why reinstatement as blanket bog is

deemed appropriate, or how this might be achieved. Similar questions arise in relation to the borrow pits. On Page 37 it is made clear that it may not be feasible to reinstate the section of track by the Enrick Gorge. Also that it is the two upper borrow pits. **We recommend that these borrow pits are not subsequently re-opened to provide material for track maintenance, and we also advise that, although successful creation of blanket bog is unlikely, it will only be possible if suitable vegetation is available as turf.**

Given that the above is presented as a significant aspect of mitigation we recommend that further details of the methods to be employed are required. **We further advise that it would make sense for this to be a component of a Habitat Management Plan covering all aspects of habitat and species management and we recommend the preparation of such a plan.**

Also on page 3 of this section "A temporary working compound...(assumed at this stage to be all located on wet heath)" is mentioned. If this compound had been identified on any of the site plans then it would not be necessary to 'assume' which habitat(s) were affected by it. **We recommend that the location of the temporary working compound be identified, its impacts assessed and suitably mitigated.**

Under the section headed Assessment of impact significance "...suitable method statements could substantially reduce the scale of impacts" are mentioned. **We support this and recommend that agreed Construction Method Statements are a condition of planning.**

We also recommend, in respect of the 3rd paragraph, that where the cable trench runs through blanket bog, there should be impermeable barriers for every 500mm fall in elevation, rather than the 5m described. This to promote recovery of blanket bog and avoid long term damage through drainage.

In the last paragraph of this section the justification for replacing wet and dry heath with pine wood is weak, particularly as the area does not appear to have been surveyed. Also, while the reference to species remaining may apply to elements of the ground flora, consideration should also be given to the faunal element. **As previously mentioned we recommend that a more comprehensive assessment of the woodland proposal is undertaken.**

An issue which does not appear to have been considered is the effect on the blanket bog on the spur on which the turbines are to be located, of being hydrologically isolated by the track from adjacent upslope and downslope areas. **We recommend that consideration is given to the long term sustainability of this apparent hydrological isolation and any appropriate mitigation measures identified.**

5. Hydrology and geology

Given the information provided in Section 1 Summary "the project infrastructure [is] positioned in area[s] away from deep peat or bog", we are surprised that construction is expected to remove 5,000m³ of peat (Section 2.4.3, 4th paragraph). **We recommend that every effort is made to avoid areas of peat.** In the same section as the above "maximum recorded peat depth...was around 0.5m", yet there is no report of any peat survey in this study. **We recommend that if such a study was undertaken that the results are made available in order to confirm avoidance of deep peat areas.**

Little evidence is provided in the ES to confirm or contradict the likelihood of a peat slide. On balance, however, **we are inclined to agree that the risk is low.**

6. Appraisal of landscape and visual impacts assessment (LVIA)

This is a very brief LVIA with lots of missing information which we have tried to list below. We point out that landscape and visual impacts are different and although there has been a

separation of the two within the report there is still a combined 'Landscape and Visual Sensitivity' table, 6.4 and combined magnitude of change table 6.7. These two elements are clearly laid out in the Guidance for LVIA.

We note that there is no mention of SNH's Strategic Locational Guidance (SLG) for windfarm development in the LVIA but the proposed wind farm falls on the boundary of Zone 1 and Zone 2 (low and medium natural heritage sensitivity).

6.1 Impacts on Landscape designations

6.1.1 Glen Strathfarrar National Scenic Area (NSA)

Although we agree with the LVIA that "*when considering the extensive forestry around the NSA, the visual impact is insignificant.*" 5.1, there is no mention of how both visual and landscape impacts need to be considered when assessing the overall impacts on a designation.

The Glen Strathfarrar NSA is only 10km from the nearest proposed turbine and shows theoretical visibility however there is no mention of a viewpoint within the NSA, making an independent assessment of impacts necessary. Also views of turbines which may be restricted by tree cover or built development this should be investigated in the field if areas of high sensitivity such as NSA's are showing theoretical visibility.

6.1.2 Glen Affric NSA

A key special quality of the Glen Affric NSA, which lies 7km from the nearest turbine, is 'A journey into wildness'. The same sense of wildness increases as you move west into one of SNH's Search Area for Wild Land. Those areas closest to the windfarm site are less likely to be adversely impacted due in part to the extent of woodland cover but also the landform in the glen itself which sometimes provides restricted views out beyond the glen, and also occasional channelled views out to the moorland beyond. Towards the west of Glen Affric where the landform rises to higher moorland plateau and wildness becomes a key landscape characteristic, the turbines will become a new feature in open views where other built features of this scale are not presently evident. This has been illustrated in VP 5 from the eastern summit of Carn Eigh. There is no doubt that the turbines will have an impact in the sense of wildness from this area which is within SNH's Search Areas for Wildland but the overall impact of this proposal on this area of wild land is likely to be that of attrition. It is this gradual attrition at the edges of wild areas that could lead to the loss of the resource as a large extent of area is needed to contain all those attributes that contribute to an area being recognised as wild land.

Through our own assessment we conclude that the individual scenic qualities of the Glen Strathfarrar NSA will not be adversely impacted and therefore the integrity of the NSA will remain intact. Although there will be a degree of landscape and visual impact on the wildness quality of the Glen Affric NSA this is unlikely to be to the extent where the integrity of the designation is compromised due to the fact that the landscape and visual impacts of the turbines are limited in extent and do not extend beyond the Carn Eigh viewpoint which lies at the edge of the wild land search area.

6.1.3 Special landscape Areas (SLA) (formally Areas of Great Landscape Value (AGLVs)) Strathconon, Monar and Mullardoch SLA

This SLA has not been recognised by the applicant even though it lies just 7km from the nearest turbine and therefore impacts on the landscape designation have not been assessed. Through our own assessment and using the information in the "Assessment of Highland Special Landscape Areas" report March 2010, the two qualities that are recognised in this SLA are the grand mountain ridges long glens and wide strath and wildness and remoteness. Similar to the experience within the NSA's, visibility of the turbines from these glens and

straths will be very limited with only the higher moorland gaining distant views of the project. It would have been useful to have a viewpoint assessment to confirm this within the SLA.

6.1.4 Loch Ness and Duntelchaig SLA

The reason for this area being recognised as special is due to the drama of the great glen which is best appreciated either from the water itself, at either end or from some of the more elevated locations along the loch sides. At 9km from the nearest turbine we would agree with the LVIA that there will be no adverse impacts on the SLA due to the lack of any visibility from either the deeply incised glen or loch sides.

We agree with the findings of the LVIA that there will not be any significant impacts on the special qualities of the Special Landscape Areas in the study area as a consequence of the Corrimony proposal.

6.2 Impacts on landscape Character

Only two landscape character areas (LCA's) have been described and assessed whereas we would expect to see an assessment of either all those LCA's in the study area (30km from proposal) or any LCA that has theoretical visibility of the proposal. It is not clear why the two have been selected as there is no supporting map showing the location and coverage of the LCA data.

There is no mention within the LVIA of any impacts on wildness or wild land within the study area as defined by SNH's Search Areas for Wild Land thus no assessment of impacts on this resource.

6.3 Impacts on Visual Amenity

No detailed analysis of the visual impacts of the proposal or summary or conclusions are drawn in the body of the document, this has been left for the short conclusion.

6.4 Visualisations

The visualisations within the document are very poor quality and do not conform to the recommendations as set out in the guidance. This issue was raised in our response to the Scoping opinion in January 2008.

6.5 Cumulative impacts

The only wind farm proposal considered within the cumulative assessment is Millennium. There is no application for a wind farm at Abriachan in the planning system and yet it has been included in the assessment. The proposal has not assessed all other proposals within a reasonable distance of 45km and should have included sites such as Fairburn and Farr which are both built, Loch Luichart, Corrigarth and Dumnaglass. This makes the cumulative assessment extremely limited and does not adhere to our guidance.

Although the LVIA correctly describes the project area as *"...isolated from other wind farms in the area, and there are no other projects on the Rocky Moorland Plateau landscape character type in this part of Highland."* (7.1) we have some concern that wind farms of this size in an area presently free from this form of development, may restrict further wind energy development that might make better use of the capacity of the landscape.

On balance this application is unlikely to result in additional cumulative impacts at present however this conclusion has not been drawn from the information provided within the LVIA which is not sufficient and has relied instead on our knowledge and experience of the area.

7. Access and recreation

The ES makes no reference to the development within the context of access rights under the Land Reform (Scotland) Act 2003 and the Countryside Scotland Act 1967. Under obligations

arising from the Land Reform Act Scotland, the ES is required to take access rights into account by including proposals for access management in and around the site during construction and operation.

We recommend that consideration be given to how these interests would be managed both during and after implementation of the development.

8. Decommissioning

We are pleased to note that the ES refers decommissioning. **We recommend that a condition is added to any planning permission awarded requiring a detailed decommissioning plan to be drafted and agreed by a certain date.**