



Hill of Fare Wind Farm

Post Submission - Additional Information Report

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Ref	ECU00004592

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1 Introduction

1.1 Background

- 1.1.1 Renewable Energy Systems Ltd (RES) (hereinafter referred to as 'the Applicant') has applied to the Scottish Ministers for Section 36 consent and deemed planning permission in terms of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, to construct and operate Hill of Fare Wind Farm (hereafter referred to as the 'Proposed Development', at site centre British National Grid NJ 70063 02717.
- 1.1.2 The application was supported by an Environmental Impact Assessment Report (EIAR) as required by The Electricity Works (Environmental Impacts Assessment) (Scotland) Regulations 2017 and submitted to the Scottish Ministers in November 2023 with the application (Reference: ECU00004592).

1.2 Purpose of this Additional Information Report

- 1.2.1 Following the submission of the Section 36 consent request for the Proposed Development, the Energy Consents Unit (ECU) consulted relevant statutory and non-statutory organisations as well as the public. Following the receipt of consultation responses, the Applicant has undertaken further assessment where appropriate and has begun to provide responses to comments / objections that have been received.
- 1.2.2 In addition, the Applicant is using this opportunity to correct any typing, spelling and referencing errors within the EIAR.
- 1.2.3 This Additional Information (AI) Report also provides the information required to address objections / concerns raised specifically relating to the cumulative impact on red kite and for a Private Water Supply Risk Assessment (PWSRA).
- 1.2.4 It should be noted that there are no changes to the Proposed Development as outlined within the application.
- 1.2.5 The information set out below is intended to be read in conjunction with the EIAR. Reference will be made to the EIAR chapter, associated technical appendices and figures where the original remains applicable.

Where any information in the EIAR is superseded by the information presented in this AI Report, this is made clear.

1.3 Availability of the AI Report

- 1.3.1 In accordance with part 6 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, hard copies of the AI Report and supporting documents can be viewed at:

Banchory Library
Bridge Street
Banchory
AB31 5SU

- 1.3.2 Hard copies of the AI Report are available by request, at a cost of £220 from:

RES Ltd,
Third Floor STV,
120 Govan Road,
Glasgow,
G51 1PQ

Email: carey.green@res-group.com

- 1.3.3 The pdf files can be downloaded from <http://www.energyconsents/scot/> and www.hilloffare-windfarm.co.uk.

1.4 Representation to the AI Report

- 1.4.1 Any representations to the application should be made directly to the Scottish Government at:

Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Email: representations@gov.scot

Online: <http://www.energyconsents.scot/>

2 Updates to the EIAR Chapter

2.1.1 As part of this AI Report, the Applicant has taken this opportunity to amend any typing, spelling or referencing issues within the EIAR. These amendments are detailed in **Table 2.1** and must be read in conjunction with the EIAR.

Table 2.1: Amendments to the EIAR

EIAR Volume	Chapter	Section	Changes to Section
1	1	1.5.1	Each ‘technical’ chapter (Chapters 6 to 15) considers... has been amended to: “Each ‘technical’ chapter (Chapters 6 - <u>14</u>) considers...”
1	2	2.2.6	For Meikle Carewe under the cell for Approximate distance to nearest turbine, the word <u>so</u> , which was an error in the table, has been deleted.
1	2	2.3.1	Under bullet point 8, the following has been added: “a Battery Energy Storage System (BESS), rated at approximately 100 MW / <u>200 MWh</u> and associated compound;...”
1	2	2.3.3	An additional column for hub heights has been added to <u>Table 2.2: Turbine Locations.</u>
1	3	3.2.5	Under the last bullet, the <u>l</u> , which was an error, has been removed.
1	10	10.1.10	In Table 10.1: Summary of Consultation Responses under the Comments section for Echt & Skene Community Council (ESCC), the following change has been made: "Potential significant impacts are assessed within sections 10.11.9 to 10.11.14" has been changed to: "Potential significant impacts are assessed within sections <u>10.1.85 to 10.1.86.</u> "
2	7	7.4	Figure 7.4 - Indicative Cultural Heritage Enhancements has been amended to remove an incorrect portion of access track from T15 towards Midmar Forest (refer to Appendix 8).

3 Responses to Comments Received

3.1 Responses to the Application

3.1.1 The responses received by the 28 June 2024 on the submission of the application from Consultees are summarised in **Table 3.1**.

Consultee	Consultation Summary Response
Aberdeen City Council	No Objection
Banchory Community Council	Objection
BT	No Objection
Cairngorms National Park Authority (CNPA)	No Objection
Cluny, Midmar and Monymusk Community Council	Objection
Crathes, Drumoak & Durris Community Council (CDDCC)	Objection
Crown Estate Scotland	No Objection
Dee District Salmon Fishery Board and River Dee Trust	Neutral
Echt & Skene Community Council (ESCC)	Objection
Edinburgh Airport	No Objection
Fisheries Management Scotland	No Objection
Glasgow Airport	No Objection
Glasgow Prestwick Airport	No Objection
Historic Environment Scotland (HES)	Objection
Highlands and Islands Airports Limited	No Objection
Inchmarlo, Brathens and Glessel Community Council (IBGCC)	Objection
NatureScot	Holding Objection - Additional Information Required
NATS Safeguarding	Objection - further mitigation discussions ongoing
Ironside Farrar Ltd - Audit of the Peat Landslide Hazard and Risk Assessment	Satisfactory - no revisions required
Royal Society for the Protection of Birds (RSPB)	Holding Objection - Additional Information Required
Scottish Forestry	No Objection
Scottish Water	No Objection
Scotways	Objection
Scottish Environment Protection Agency (SEPA)	Holding Objection - Additional Information Required

Consultee	Consultation Summary Response
Torphins Community Council	Objection
Transport Scotland	No Objection

3.1.2 An objection has been received from Chris Ford of Planwell UK, on behalf of Hill of Fare Information Group (HOFWIG).

3.2 Responses to Comments on the EIAR

3.2.1 Table 3.2 provides responses to holding objections or responses to comments where they are required.

Table 3.2: Responses to Objections and Request for Additional Information

Comment Received	Applicant Response
SEPA	
<p>1.5 According to SEPA records, there is a PWS that may be impacted by the proposed development that was not included on the list in Appendix 10.3. The property that this PWS serves does fall out with the 250m buffer (approximately 1.2km away), however it is directly downgradient of turbine 4 and 5 and may have hydraulic continuity to construction works. The property is Braeside (365550, 802720). Based on the information SEPA holds it is a PWS (borehole, spring or well), however Ordnance Survey Maps show that it is a covered reservoir. We therefore object due to lack of information on this PWS. We will consider removing this objection once the source of this PWS is confirmed and it is demonstrated the proposals will not have a significant impact on the groundwater flow and groundwater quality feeding to the source of this PWS (Braeside).</p>	<p>A review and update of Technical Appendix 10.3 and Figure 10.7 has been undertaken, refer to Appendix 2 and Appendix 3 which include Braeside.</p>
<p>2.2 However, unfortunately with regards Appendix 10.2 - Peat Management Plan (PMP), there appears to be anomalies in the excavation peat volumes in comparison to both Figure 10.5 and Tables 4.1 and A.1 which we require to be clarified before any consent is issued. For example, the total excavated volume for Acrotelm Peat in Table A.1 is given as 11,527m³ but the volumes given for each infrastructure component adds up to a total of 18,662m³. Some more anomalies are highlighted in the relevant sections below. We therefore object to this application until clarification on this matter (TA10.2, Tables 4.1, A.1, Fig 10.5) is given and a revised Appendix 10.2 is submitted to accurately reflect the peat survey and layout shown in Figure 10.5.</p>	<p>A review and update of Technical Appendix 10.2 Peat Management Plan has been undertaken. Refer to Appendix 4 for the updated Technical Appendix. Refer to Section 4.2 for a summary of the amendments to the PMP.</p>
<p>2.4 T13 - Figure 10.5 appears to indicate this turbine and its associated crane hardstanding are on shallow soils. Table 4.1 states 1711m³ of peat will be excavated for the T13 hardstandings. We submit a holding objection in relation to this component and request the applicant confirms which document is correct and resubmits modified documents accordingly.</p>	<p>A review and update of Technical Appendix 10.2 Peat Management Plan has been undertaken. Refer to Appendix 4 for the updated Technical Appendix.</p>

Comment Received	Applicant Response
SEPA	
<p>2.6. We request the applicant investigate the possibility of moving the construction compound further to the south-west or floating this component. Alternatively, could the construction compound be located in one of the areas currently proposed for the borrow pits between T14 and T15? We submit a holding objection in relation to this component until modified plans are submitted or strong justification is given why one of these suggestions cannot be taken forward to further reduce the impact on carbon rich soils.</p>	<p>The Borrow Pit search areas have been located in areas which are outwith areas of peat, with exception of some small patches. It is not guaranteed that the entire borrow pit search area will be utilised, this will depend on the volume of rock required. The update to the Peat Management Plan (Appendix 4) should make this clearer.</p>
<p>2.7 There appears to be no justification as to why this facility [BESS] cannot be located further off deeper peat or relocated to shallower peat nearby, for example, could the substation and battery facility be swapped in location? Or could this component be floated? We therefore object to this component of the proposal and will consider removing our objection on the submission of modified proposals with a revised location, construction details or reduced area of this facility off deeper peat.</p>	<p>During the design iteration process, as described in Chapter 3, Design Evolution and Alternatives, the Battery Energy Storage System (BESS) has been micro-sited out of areas of deeper peat and is located within an area of commercial / plantation forestry which will have been drained resulting in peat being degraded or of modified condition.</p>
<p>2.8 No estimated peat excavation volumes have been provided in Table A.1 for these components [borrow pit search areas]. Whilst we note the five borrow pit search areas are to be refined following further site investigation, Figure 10.5 indicates the proposed borrow pit between T4 and T5 is partly located on deeper peat and likely to require excavation of deeper peat but has not been reflected in Tables 4.1 and A.1, with all excavated soil appearing in the 'Soils' column rather than a peat column. The borrow pits between T14 and T15 also have pockets of deeper peat within them that should also be included in revised PMP volumes. We therefore submit a holding objection on relation to this component until a revised PMP is submitted which accurately reflects the peat survey and layout shown in Figure 10.5 or further clarification is given on the volumes given</p>	<p>A review and update of Technical Appendix 10.2 Peat Management Plan has been undertaken. Refer to Appendix 4 for the updated Technical Appendix.</p>
RSPB	
<p>RSPB Scotland has significant concerns regarding the likely cumulative impacts on the Red Kite population from operational and proposed wind farms in this area, particularly from predicted collisions. While we welcome the cumulative</p>	<p>The project ornithologists, MacArthur Green, have addressed the comments provided by RSPB regarding the cumulative collision effects on the red kite population. The response is attached as Appendix 5.</p>

Comment Received	Applicant Response
<p>assessment that has been carried out, including the deterministic matrix formulation population model, we do not believe that the most up to date collision risk figures have been included for the recently approved Glendye wind farm (DPEA reference WIN-110-3). Without the inclusion of this data in the modelling, the predicted impacts on Red Kite are expected to be significantly underestimated. Therefore, we strongly advise that to allow an assessment of predicted impacts on the Red Kite population, the cumulative collision risk figures must be revised and an updated assessment of the cumulative collision effects on the red kite population provided.</p>	
<p>Historic Environment Scotland</p>	
<p>We object to the application because of the impact it will have on the setting of two scheduled monuments. The monuments are known as Sunhoney, stone circle 240m NW of (SM44) and Christchurch Stone Circle and Standing Stone, Midmar (SM32). We have identified a significant adverse impact on the integrity of the settings of these scheduled monuments. This is therefore contrary to National Planning Framework 4, Policy 7 h. The impacts on these scheduled monuments raises issues in the national interest for our remit.</p>	<p>The project heritage consultants, SLR Consulting, have provided clarification in response to the objection received from HES in April 2024. SLR's additional information to HES is attached as Appendix 6.</p> <p>Please note that the 3D model video referenced in Section 3.1.2.9 of Appendix 6 cannot be uploaded to the ECU portal as the portal does not support video files. The 3D model video is available to view at the Applicant's website- www.hilloffare-windfarm.co.uk.</p>
<p>NatureScot</p>	
<p>Birds: This proposal could have significant cumulative impacts on the red kite population from predicted collisions. We are unable to carry out a full assessment as the most up to date collision risk figures have not been included. We therefore object to this proposal until the cumulative collision risk figures are revised and an updated assessment of the cumulative collision effects on the red kite population has been provided.</p>	<p>MacArthur Green have addressed the comments provided by NatureScot regarding the cumulative collision effects on the red kite population. The response is attached as Appendix 5.</p>

4 Additional Information

4.1 Overview

4.1.1 As discussed in **Table 3.2** a number of additional reports have been produced to respond to objections and requests for additional information. This section provides an overview of the additional information provided in Appendices 1 - 7 of this document.

4.2 Hydrology, Geology and Hydrology

Private Water Supply Risk Assessment

4.2.1 The Applicant commissioned Envirocentre to undertake a PWSRA following the comments received from SEPA (see **Table 3.2**). The PWSRA has been produced to provide further information in relation to the potential impacts of proposed access track upgrades on the Dunecht Estate Private Water Supply (PWS). The PWSRA is attached as **Appendix 1**.

4.2.2 The report concludes that following the implementation of mitigation measures all potential impacts are considered to be of low risk, meaning risks are unlikely, with a slight change in water supply predicted over very short timescales and within the bounds of normal water supply variation.

Private Water Supply within 2km of the Proposed Development

4.2.3 Envirocentre undertook a review and subsequent update of the Technical Appendix 10.3 and Figure 10.7 Private Water Supplies to include Braeside, in accordance with the comments received from SEPA (see **Table 3.2**) and an additional property, Burnside Cottage, which was not identified within Technical Appendix 10.3.

4.2.4 As both Burnside Cottage and Braeside are outwith the assessment buffers they do not require assessment within the EIAR however have now been added to Technical Appendix 10.3 and Figure 10.7. Please note the updated Technical Appendix 10.3 and Figure 10.7 attached to this document as **Appendix 2** and **Appendix 3** respectively, supersede the versions submitted within the EIAR.

Peat Management Plan

- 4.2.5 The Applicant commissioned Envirocentre to review the Peat Management Plan (PMP) following the comments received from SEPA. Following the review of the PMP it was noted that some of the soil values within Tables 4-1 to 4-4 were within the wrong columns and have now been corrected. The updated PMP is attached as **Appendix 4**.

4.3 Ornithology

- 4.3.1 Following comments received from RSPB and NatureScot the Applicant commissioned MacArthur Green to update the collision risk assessment as the collision rate estimate for Glendye Wind Farm were updated after additional survey work.
- 4.3.2 The revised assessment concluded that cumulative collisions on the Aberdeenshire and Angus population continues to be considered of low magnitude, and thus minor adverse and not significant in the context of the EIA Regulations.
- 4.3.3 In terms of mitigation, the revised assessment references paragraph 9.7.3 of Chapter 9 of the EIAR, the removal of deer carrion/gralloch from within 200m of the Proposed Development turbines throughout the operational period to help reduce the attractiveness of areas near turbines for red kite, and therefore reducing collision risk for red kite. Refer to **Appendix 5** for the revised assessment.

4.4 Landscape and Visual

- 4.4.1 Following the submission of the Section 36 application, it was noted that the viewpoint from Meikle Tap (viewpoint 10) only provided a photomontage showing the turbines but did not include any of the other infrastructure (Figure 6.44 of Volume 3 of the EIAR). Within the EIA Scoping Report, it had been indicated that the photomontage from viewpoint 10 would show all infrastructure. The Applicant has commissioned Pegasus Group to produce this photomontage, showing all infrastructure including access tracks and the BESS. Refer to **Appendix 7** for the updated photomontage from Meikle Tap.

Appendix 1 - Dunecht Estate Private Water Supply Risk Assessment

Appendix 2 - Updated Technical Appendix 10.3 Private Water Supply within 2 km of the Proposed Development

Appendix 3 - Updated Figure 10.7

Appendix 4 - Updated Peat Management Plan (Technical Appendix 10.2)

Appendix 5 - Response to RSPB and NatureScot

Appendix 6 - Additional Information for HES

Appendix 7 - Meikle Tap Photomontage

Appendix 8 - Figure 7.4 Cultural Heritage Enhancement Mitigation
