Carn na Saobhaidh Wind Farm

Scoping Addendum

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Abbreviations

Term	Definition
ARWTN	Assessment and Rating of Wind Turbine Noise
AWI	Ancient Woodland Inventory
BCT	Bat Conservation Trust
BEMP	Biodiversity Enhancement Management Plan
BESS	Battery Energy Storage System
BGS	British Geological Survey
CAR	Controlled Activity Regulation
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
DBW	Daytime Bat Walkover
DESNZ	Department for Energy Security & Net Zero
DWPAs	Drinking Water Protected Areas
EASR	Environmental Authorisations (Scotland) Regulations
ECoW	Ecological Clerk of Works
ECU	Energy Consents Unit
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
FWPM	Freshwater Pearl Mussel
GCN	Great Crested Newt
GDL	Gardens and Designed Landscapes
GLTA	Ground Level Tree Assessment
GWDTE	Groundwater Dependent Terrestrial Ecosystem
ha	Hectares
HEPS	Historic Environment Policy for Scotland
HER	Historic Environment Record
HES	Historic Environment Scotland
HSI	Habitat Suitability Index
IEF	Important Ecological Feature
INNS	Invasive Non-Native Species
IOF	Important Ornithological Feature

Term	Definition
LEPO	Long-Established Plantation of Woodland Origin
LCT	Landscape Character Type
LNCS	Local Nature Conservation Site
LVIA	Landscape and Visual Impact Assessment
NATS	National Air Traffic Services
NBN	National Biodiversity Network
NPF4	National Planning Framework 4
NSA	National Scenic Area
NVC	National Vegetation Classification
OGL	Open Government Licence
OBEMP	Outline Biodiversity Enhancement Management Plan
OPMP	Outline Peat Management Plan
PCA	Peatland Condition Assessment
PLHRA	Peat Landslide Hazard and Risk Assessment
SAC	Special Area of Conservation
SEPA	Scottish Environment Protection Agency
SLA	Special Landscape Area
SM	Scheduled Monument
SPA	Special Protection Area
SPP	Species Protection Plan
SSSI	Site of Special Scientific Interest
THC	The Highland Council
WFD	Water Framework Directive
ZoI	Zone of Influence

1 Introduction

1.1 Background and Context to Scoping Addendum

1.1.1 In August 2024, Renewable Energy Systems Ltd (RES) (the 'applicant') submitted an Environmental Impact Assessment (EIA) Scoping Report to the Energy Consents Unit (ECU) for the proposed construction and operation of an onshore wind farm (the 'proposed development') on land located in the Monadhliath Mountains which falls entirely within the jurisdiction of The Highland Council (THC).

1.1.2 The Scoping Report comprised a formal request to the Scottish Government under Regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017[1] ('EIA Regulations') to confirm, with the ECU and required consultees, the scope of the assessment to be provided in the EIA Report. A Scoping Opinion was issued by the ECU (reference no. ECU00005191) on 20 November 2024.

1.1.3 The Scoping Report and Scoping Opinion are available to view online at the Energy Consents Unit website at the following address: https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00005191.

1.1.4 Since the Scoping Opinion was issued in 2024, the proposed access route has been altered (the 'revised access track') leading to a subsequent alteration to the site boundary to accommodate this revision. In addition, the extent of the site boundary encompassing the wind turbine infrastructure has also reduced in size (see **Figures 1.1** and **1.2**).

1.1.5 This Scoping Addendum provides an update to the Scoping Report, including a description of the revised access track, an outline the environmental baseline along its route and identification of any proposed changes to survey work and/or assessment that will be required for each of the EIA topics that will form the EIA Report.

1.1.6 As the Scottish Renewables guidance, *Guidelines on Streamlining Environmental Impact Assessment for Onshore Wind Farms*[2] (the 'EIA Streamlining Guidance') has been issued since the previous Scoping Report, this Scoping Addendum will also seek to address some of the key requirements of streamlining that were not part of the original scoping exercise.

2 Revised Access Track

2.1 Overview

2.1.1 The revised access track for the proposed development will connect to the public road network from the U2856 (Findhorn Bridge – Slochd Road) approximately 12 km to the east of the wind turbine infrastructure and approximately 3 km to the south-east of Tomatin (see **Figure 1.2**). The revised access track measures approximately 18.7 km in total length comprising approximately 10.2 km of upgraded track and 8.5 km of new track.

[1] Scottish Government (2017) The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. SSI 2017/101. Edinburgh: The Stationery Office.

[2] Scottish Renewables (2025) *Guidelines on Streamlining Environmental Impact Assessment for Onshore Wind Farms*. Available at: https://www.scottishrenewables.com/assets/000/005/061/Streamlining_EIA_Guidance_September_2025_original.pdf

2.1.2 From its junction with the U2856, the revised access track passes through predominantly upland moorland for the first 13 km. Following existing tracks, it routes north of Carn a' Gharbh-choire, passing between Carn na Loinne and Carn na Glaic Fhluich before leaving the existing track to continue west and crossing the Clune Burn.

2.1.3 West of this crossing, it rejoins an existing access track as far as Caochan Leiteir, where a new watercourse crossing will be required. From there, it continues southwards and then westwards to join another section of existing track after crossing Caochan nan Gamhainn. It then continues in a north-westerly direction before turning west approximately 350 m south of the River Findhorn.

2.1.4 From this point it crosses open moorland for approximately 2.6 km. It continues westward through forestry to the south of Dalmigavie Lodge, rejoining a small section of existing track before crossing the River Findhorn approximately 310 m east of Glenmazeran Lodge. After crossing the River Findhorn, it will join the U2836 (Garbole – Cognafearn Road) and travel southward before leaving the public road to follow an existing track westward through Glenmazeran Forest. Once beyond Glenmazeran Forest it will leave the existing track, crossing Glenmazeran Burn and continue north-west towards Aonach Odhar.

2.1.5 The revised access track will require up to a total of 25 watercourse crossings, 13 of which are additional to those proposed for Clune Wind Farm. Crossings of the River Findhorn and Glenmazeran Burn will require a bridging solution.

2.1.6 The revised access track connects to the U2856 in the same location as the proposed Clune Wind Farm, which is currently under consideration by the Scottish Government (ECU Reference: ECU00005038). In addition to this, up to 6.4 km of the revised access track follows the same alignment as access tracks proposed for Clune Wind Farm (see **Figure 1.2**). In the event that Clune Wind Farm is consented and constructed, it is intended that the proposed development would utilise these access tracks as set out on **Figure 1.2**. However, the EIA for the proposed development will assess the full extent of the revised access track.

3 Revised Site Boundary

3.1.1 In addition to the revision to the site boundary to accommodate the revised access track, the site boundary encompassing the wind turbine infrastructure has also been revised and significantly reduced since the Scoping Report, as set out on **Figures 1.1** and **1.2**.

3.1.2 The site boundary now encompasses an area of approximately 1,432 hectares (ha).

4 Approach to Scoping Addendum

4.1.1 The following sections of the Scoping Addendum describe the baseline environmental conditions associated with the revised access track for each of the proposed EIA Report topics. They also identify any amendments to the assessment scope and methodology arising from the revised access track. Where relevant, impacts relating to the revised access track that are proposed to be scoped out of the EIA are identified, and topic-specific questions for consultees are also posed within the corresponding sections.

5 Landscape and Visual

5.1 Baseline

5.1.1 The Scoping Report included the potential for effects that the proposed development may have on the landscape and visual resource, including effects on the landscape elements of the site where aspects of the proposed development such as access tracks would result in physical changes to the underlying landscape. The revised access track is located on land to the south-east of the originally proposed access track. It predominantly traverses areas of open moorland, crossing Strathdearn near Dalmigavie Lodge. All of the proposed infrastructure is still located entirely within Landscape Character Type (LCT) 221 – Rolling Uplands Inverness. Whilst the location of the access track is different, the scope of assessment is unchanged in that the landscape and visual impact assessment (LVIA) will still assess the potential landscape and visual effect of the revised access track, including its potential physical effect on the underlying landscape elements. With reference to the revised access track this will likely include moorland and forestry but also the trees and meadows within Strathdearn that may be affected, subject to final design.

5.1.2 It is recognised that since the Scoping Report was submitted, there are some changes in the cumulative situation surrounding the proposed development including the introduction of the wind farm applications Lynemore and Kyllachy to the north-east and the Scoping stage wind farms of Glenkirk to the north-east and Glenmarkie to the south-west. In order to capture these and any other changes to the cumulative baseline context, an updated cumulative search will be undertaken close to design freeze to allow the cumulative assessment to be undertaken prior to submission. This approach has not altered and is unaffected by the revision of the access track.

5.2 Amendments to Scope of Survey/Assessment and Methodology

5.2.1 It is acknowledged that THC have agreed with the Scoping Report proposal to scope out National Scenic Areas (NSAs), Gardens and Designed Landscapes (GDLs), and Special Landscape Areas (SLAs) other than the Loch Ness and Duntelchaig SLA. NatureScot consider that the proposed development would not raise issues of national interest in relation to the Cairngorms National Park and Cairngorms NSA and have agreed with the Scoping Report that a Wild Land Assessment of Wild Land Area 20 is not required.

5.2.2 In response to the Scoping Report, a number of additional viewpoints were requested by THC, Stratherrick & Foyers Community Council and Strathnairn Community Council, with further locations also requested by THC more recently in email correspondence. These additional viewpoints have been incorporated into the final list of viewpoints for the LVIA as agreed via email correspondence with THC, NatureScot and ECU.

5.2.3 The Scoping Report set out the proposed methodology and approach to be applied in the production of the LVIA for the proposed development. This included taking account of potential effects on landscape elements, landscape character, landscape designations, wild land areas and visual receptors. It is considered that the revised access track will not fundamentally alter the LVIA scope of assessment and methodology presented in the Scoping Report.

5.2.4 The following additional guidance has been published in the interim period between the Scoping Report submission and this Scoping Addendum.

- NatureScot (2024). Guidance on Aviation Lighting Impact Assessment. Available at: https://www.nature.scot/doc/guidance-aviation-lighting-impact-assessment [Accessed July 2026].
- NatureScot (2025). Guidance for Assessing the Effects on Special Landscape Qualities. Available at: https://www.nature.scot/doc/special-landscape-qualities-effects-assessment-slq-consultation [Accessed July 2026].

5.2.5 These updated guidance documents will be referred to in the LVIA where relevant.

5.3 Issues Scoped Out

5.3.1 There are no further issues proposed to be scoped out in addition to those described in Section 6 of the Scoping Report.

5.4 Questions to Consultees

- Q5.1: Answers have been received from consultees in response to queries raised in Section 6.8 of the Scoping Report. There are no further landscape and visual questions to pose to consultees as a result of the revised access track.

6 Cultural Heritage and Archaeology

6.1 Baseline

6.1.1 There is one designated heritage asset within the revised site boundary: Banchor, cairn 315 m SE of (Scheduled Monument SM11814). The cairn is located approximately 75 m north of the revised access track and 6 km to the east of the site boundary encompassing the wind turbine infrastructure. The asset is shown on **Figure 6.1.**

6.1.2 There are seven non-designated assets recorded within THC Historic Environment Record (HER) located within the revised site boundary, in addition to ten potential heritage assets recorded within the site boundary during an October 2024 walkover survey. These assets are shown on **Figure 6.1.**

6.1.3 Within the revised site boundary, there are seven assets recorded on the HER. The earliest are prehistoric assets such as field systems (MHG2795, MHG2850), which contain cultivation remains and hut circles, and a cairn (MHG2847), in addition to the aforementioned Banchor, cairn (SM11814). In addition to Banchor, cairn (SM11814), the majority of these prehistoric assets are located upon the lower slopes of Càrn Bad an Daimh, above the flood plain of the River Findhorn, which runs through Strathdearn. There are prehistoric assets, both designated and non-designated, within the wider landscape, such as Dalarossie Cottage, cairn (SM11815), located 0.3 km to the north of the revised access track, potential hut circles (MHG63141), located 0.5 km south-east of the revised access track, and Kyllachy Hill Cairn (MHG61450), located 1 km north-west of the revised access track. This is indicative of prehistoric settlement and funerary activity along the banks of the River Findhorn.

6.1.4 Two deserted townships (MHG26193, MHG63164) are located along the revised access track, likely dating to the post-medieval period, as well as an undated, but likely post-medieval,

farmstead and field system (MHG14250) and a house (MHG55424). As with the prehistoric assets, the majority of the post-medieval assets are located along the lower slopes of the various hills throughout the landscape, along the banks of the River Findhorn. They are demonstrative of the continued human presence within Strathdearn, primarily focussed on agricultural practices and settlement.

6.1.5 A walkover survey of the site area containing wind turbine infrastructure (as proposed at that time) was carried out in October 2024. Requirements for further walkover surveys are outlined in **Section 6.2**.

6.1.6 During the 2024 walkover survey, ten assets were recorded within the site boundary. This area of the landscape does not appear to have been subject to any archaeological survey in the past. Five of the recorded assets comprise turf and stone mounds, thought to be potential cairns (SLR1002, SLR1003, SLR1006, SLR1007, SLR1008). An area of potential hut circles (SLR1001) was recorded in proximity to SLR1006, and there are four areas of turf and stone banks, which may form enclosures (SLR1004, SLR1005, SLR1009, SLR1010). One of these areas of turf and stone bank (SLR1009) is adjacent to potential rig and furrow. Whilst some of these potential assets could be tentatively dated as prehistoric, a definitive date cannot be attributed without further archaeological works as the assets are mostly ruinous and lack any other context. However, their presence enables us to understand that there has been human activity within this area of the site, likely for a significant time, and that there is the potential for further, as-yet-unrecorded, heritage assets to be located within the site including sub-surface remains.

Table 6.1: Heritage Assets Located Within the Revised Site Boundary

Asset Reference	Asset Name	Asset Type	Period	Source
MHG2795	Field System, Carn Na Loinne	Field System	Prehistoric	THC HER
MHG26193	Wester Strathnoon	Township	Post-medieval	THC HER
MHG2850	Field System, Banchor	Field System	Prehistoric	THC HER
SM11814/MHG2848	Banchor, cairn 315 m SE of	Cairn	Prehistoric	Historic Environment Scotland; THC HER
MHG2847	Cairn, Banchor	Cairn	Prehistoric	THC HER
MHG14250	Banchor	Farmstead; Field System	Undated; likely Post-medieval	THC HER
MHG63164	Township - Auchmore, E of Dalmigavie Lodge	Township	Post-medieval	THC HER
MHG55424	House at Laggan, Glenmazeran	House	Post-medieval	THC HER
SLR1001	N/A	Potential Hut Circles	Undated	2024 Walkover Survey

Asset Reference	Asset Name	Asset Type	Period	Source
SLR1002	N/A	Cairn	Undated	2024 Walkover Survey
SLR1003	N/A	Cairn	Undated	2024 Walkover Survey
SLR1004	N/A	Enclosure	Undated	2024 Walkover Survey
SLR1005	N/A	Turf and Stone Linear Bank	Undated	2024 Walkover Survey
SLR1006	N/A	Circular Turf Mound, Potential Cairn	Undated	2024 Walkover Survey
SLR1007	N/A	Cairn	Undated	2024 Walkover Survey
SLR1008	N/A	Cairn	Undated	2024 Walkover Survey
SLR1009	N/A	Turf and Stone Bank. Rig and Furrow	Undated	2024 Walkover Survey
SLR1010	N/A	Turf and Stone Circular Feature	Undated	2024 Walkover Survey

6.2 Amendments to Scope of Survey/Assessment and Methodology

Direct and Indirect Physical Impacts

6.2.1 All cultural heritage assets within the revised site boundary will be assessed in order to determine the potential for any direct and indirect impacts. This includes the direct and indirect impacts upon known and as-yet-unrecorded heritage assets along the revised access track.

6.2.2 It is noted that Banchor, cairn (SM11814) sits approximately 75 m north of the revised access track. It is acknowledged that any impacts upon the fabric of the cairn would be in contradiction to the Ancient Monuments and Archaeological Areas Act 1979[3] unless Scheduled Monument Consent is acquired. Accordingly, a 50 m avoidance buffer will be used throughout the design process, in order to ensure that the asset is not in proximity to any infrastructure. Additionally, mitigation will be proposed within the Cultural Heritage Assessment EIA Chapter to ensure that no accidental damage occurs during construction. This will likely comprise demarcation of the avoidance buffer and micrositing restrictions in the immediate vicinity of the asset.

6.2.3 Whilst a walkover survey of the site area containing wind turbine infrastructure was carried out in October 2024, the revised access track has not currently been surveyed. As such, a walkover

[3] UK Government (1979) *The Ancient Monuments and Archaeological Areas Act 1979*. Available at: https://www.legislation.gov.uk/ukpga/1979/46

survey of the revised access track will be undertaken in order to confirm the location of any recorded assets and identify if there are any further as-yet-unrecorded assets along its length.

6.2.4 Furthermore, HER data for the site was originally purchased in 2024. It is acknowledged that HER data is regularly updated and as such, the data will be repurchased in order to accurately inform the assessments presented within the Cultural Heritage Assessment EIA Chapter.

Impacts to Setting

6.2.5 With regards to the assets scoped into the setting assessment, as outlined in **Section 7.4** of the Scoping Report, the potential effects of the revised access track on their setting will be considered. This is most relevant to the setting of Banchor, cairn (SM11814), which is located within the revised site boundary and 75 m north of the revised access track.

6.3 Updated Methodology

6.3.1 Since the submission of the Scoping Report the assessment methodology has been updated, utilising comments from consultees and updated guidance[4]. As such, an updated assessment methodology has been provided.

Methodology

6.3.2 The proposed development has the potential to result in effects upon the cultural significance of heritage assets where it changes their baseline condition and/or their setting.

6.3.3 In accordance with the EIA Regulations and the *EIA Handbook*[5], this assessment will identify any development impacts as direct (physical) impacts, indirect (physical) impacts, direct (settings) impacts, and cumulative impacts. With regard to the *EIA Handbook*[5], consideration will also be given to whether the impacts are adverse or beneficial, and short-term, long-term, or permanent.

6.3.4 Impacts on cultural heritage assets will be identified and assessed with reference to the guidance set out in the *EIA Handbook*[5] and the *Historic Environment Policy for Scotland* (HEPS), specifically HEP3[6] and HEP4[6].

6.3.5 Direct impacts upon the cultural significance of heritage assets will take into account the level of their cultural significance (where known) and the magnitude (extent) of the identified impacts.

6.3.6 Where direct impacts on an asset's setting are concerned, the sensitivity of an asset's setting to change will also be considered and will be carried out following the three-stage approach outlined in *Managing Change in the Historic Environment: Setting*[7]. The three-stage approach is as follows:

- Stage 1: identify the historic assets that might be affected by the proposed development;

[4] Scottish Renewables (2025) *Guidelines on Streamlining Environmental Impact Assessment for Onshore Wind Farms*. Available at: https://www.scottishrenewables.com/assets/000/005/061/Streamlining_EIA_Guidance_September_2025_original.pdf?1758009802

[5] Scottish Natural Heritage and HES (2018). Environmental Impact Assessment Handbook – Version 5: Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment process in Scotland. Available at: https://www.nature.scot/doc/handbook-environmental-impact-assessment-guidance-competent-authorities-consultees-and-others.

[6] Historic Environment Scotland (2019a) *Historic Environment Policy for Scotland (HEPS)*, Page 14. Available at: https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/

[7] Historic Environment Scotland (2020) *Historic Environment Scotland Guidance on Managing Change in the Historic Environment: Setting*, Page 8. Available at: https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=80b7c0a0-584b-4625-b1fd-a60b009c2549

- Stage 2: define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced; and
- Stage 3: evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated.

Cultural Heritage Significance

6.3.7 For both designated and non-designated heritage assets, cultural significance is derived from its inherent heritage interests, as outlined in HES's Designation Policy and Selection Guidance annexes[8].

6.3.8 These categories of cultural significance are outlined in **Table 6.2** which categorises heritage assets based on their designation and presumed value, using guidance provided in Appendix 1 Figure 2 of the *EIA Handbook*[5]. This is referred to as *sensitivity* in the *EIA Handbook* and will henceforth be referred to as cultural heritage significance. **Table 6.2** will act as an aid to consistency in the exercise of professional judgement and provide transparency for others in evaluating the conclusions drawn.

Table 6.2: Cultural Heritage Significance.

Cultural Heritage Significance	Explanation
Highest	Sites of international importance, including World Heritage sites.
High	Sites of national importance, including: • Scheduled Monuments; • Category A Listed Buildings; • Gardens and Designed Landscapes included on the national inventory; • Designated Battlefields; and • Non-designated assets of equivalent significance.
Medium	Sites of regional/local importance, including: • Category B and C Listed Buildings; • Some Conservation Areas; and • Non-designated assets of equivalent significance.
Low	Assets of local importance. Cultural heritage assets compromised by poor preservation and/or poor survival of contextual associations or with little of the asset remaining to justify a higher importance.
Negligible	Assets that are of very little or no heritage interest. Cultural heritage assets where the ability to interpret their archaeological context has been removed/eroded.
Unknown	Further information is required to assess the significance of these assets.

[8]Historic Environment Scotland (2019b) *Designation Policy and Selection Guidance*, Annexes 1-5. Available at: https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=8d8bbaeb-ce5a-46c1-a558-aa2500ff7d3b

6.3.9 The factors contributing to cultural significance extend beyond their designation status and are subject to more individual nuance based on the asset's characteristics such as type, function, and physical and temporal relationships within the archaeological landscape. The assessment takes into account the factors contributing to an asset's cultural significance as well as the sensitivity of the heritage asset to change. Each element of an asset's setting may make a positive, neutral, or negative contribution to the cultural significance of an asset[8].

6.3.10 An asset's sensitivity to change refers to the capacity of the asset's setting to retain its ability to contribute to the understanding, appreciation, and experience of the asset and its cultural significance despite the introduction of changes caused by the proposed development to the asset's baseline environment.

6.3.11 The contribution of the asset's setting to its cultural significance, and sensitivity thereof, varies based on the type/function of asset and its current setting. As part of the assessment, the contribution of the asset's setting and relative sensitivity to change will be presented with relevant justification, utilising the results of desk-based research, a field visit, and professional judgement.

Magnitude of Impact

6.3.12 Determining the magnitude of any likely impacts includes consideration of the nature of the activities proposed during the construction, operational and decommissioning phases of the proposed development. Changes could potentially include, but are not limited to, ground disturbance due to construction activities and changes to setting. The latter might include visual change, as well as the introduction of noise, vibration, smell, dust, or traffic movements.

6.3.13 Where adverse impacts on cultural heritage assets are possible, the magnitude of impact can be reduced through measures to prevent, reduce and/or, where possible, offset these effects.

6.3.14 Considering all embedded mitigation measures, the magnitude of any change will be assessed using professional judgement, with reference to the criteria set out in **Table 6.3**.

Table 6.3: Magnitude of Change

Magnitude of Change	Explanatory Criteria
High Beneficial	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, is considerably enhanced.
Medium Beneficial	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, is enhanced to a clearly discernible extent.
Low Beneficial	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, is enhanced to a minor extent.
Neutral/None	The proposed development would not impact the cultural heritage significance of the heritage asset, or the ability to understand, appreciate and experience it.

Magnitude of Change	Explanatory Criteria
Low Adverse	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, is eroded to a minor extent.
Medium Adverse	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, is eroded to a clearly discernible extent.
High Adverse	Changes to the elements of the fabric or the setting of the cultural heritage asset that contribute to its cultural significance, such that this cultural significance, or the ability to understand, appreciate and experience the asset, would be considerably eroded.

Significance of Effect

6.3.15 **Table 6.4** provides a matrix that relates the cultural significance of the asset to the magnitude of impact on its cultural significance, to produce an overall anticipated level of effect (significance of effect). The table outlines a graduated scale, using the example found within the *EIA Handbook*. Where two impacts are possible, through application of the matrix, professional judgement, supported by justification will be used to determine the level of significance.

Table 6.4: Significance of Effect

		Cultural Significance (Excluding Unknown)				
		Highest	High	Medium	Low	Negligible
Magnitude of Impact	High	Major	Major	Major / Moderate	Moderate / Minor	Minor / Negligible
	Medium	Major	Major / Moderate	Moderate	Moderate/ Minor	Minor / Negligible
	Low	Moderate	Moderate / Minor	Moderate / Minor	Minor	Negligible
	Neutral/None	Nil	Nil	Nil	Nil	Nil

Cumulative Effect

6.3.16 Cumulative effects will be assessed in line with the guidance provided in the *EIA Handbook*[5]. A cumulative effect is considered to occur when there is a combination of:

- An impact on an asset or group of assets due to changes resulting from the proposed development; and
- An impact on the same asset or group of assets resulting from other wind farm developments, or other EIA applications of a similar scale (consented, under construction, awaiting decision, but not operational) within the surrounding landscape.

6.3.17 In line with guidance presented in *Managing Change in the Historic Environment: Setting*[7] any effect resulting from operational wind farms will be considered as part of the baseline of the asset and will be considered in the construction and operational impacts sections of this chapter.

6.3.18 Assets with a minor or higher significance of effect resulting from the proposed development in isolation will be considered for cumulative assessment, as these assets are most likely to be susceptible to significant cumulative effects. A study area from each asset assessed will be defined based on professional judgement, allowing the assessment to encompass both the proposed development and any other developments within the surrounding landscape deemed to have the potential for cumulative effects.

Significance

6.3.19 Once the anticipated effects of the proposed development upon cultural heritage assets are defined, professional judgement will be used to determine whether those effects are 'Significant' or 'Not Significant' for the purposes of EIA. As part of this determination process, regard will be given to any relevant guidance.

6.3.20 With reference to the matrix presented in **Table 6.4:**

- any effects identified as 'major' will be considered 'Significant';
- any effects identified as 'moderate' might also be considered 'Significant,' although professional judgement may determine otherwise on the basis of the associated site-/asset-specific detail; and
- any effects identified as 'minor' or less are unlikely to be considered 'Significant,' though again, professional judgement would be exercised.

6.3.21 A clear statement will be made in relation to all affected assets as to whether the identified effects upon them are considered to be 'Significant' or 'Not Significant' for purposes of EIA.

Application of NPF4

6.3.22 Policy 7h) of NPF4 states that development proposals affecting scheduled monuments will only be supported where: "*significant adverse impacts on the integrity of the setting of a scheduled monument are avoided*."

6.3.23 Regarding Scheduled Monuments and Gardens and Designed Landscapes, a significant effect in EIA terms does not necessarily equate to a significant impact upon the integrity of setting. Where significant effects are found, a detailed assessment of adverse impacts upon the integrity of the setting is made. Changes to factors of setting that contribute to cultural significance, such that the understanding, appreciation and experience of an asset are not adequately retained will have a significant adverse impact on the integrity of its setting[9]. This is most likely to occur where the sensitivity of setting is deemed to be highly sensitive to change.

Residual Impacts

6.3.24 Residual impacts are those that remain even after the implementation of suitable mitigation measures. Residual impacts will be identified, and the level of those residual impacts defined with reference to **Table 6.4**.

[9] As defined and agreed in the Hill of Fare Wind Farm Cultural Heritage Statement of Agreed Matters (July 2025). DPEA Reference: WIN-110-4

6.4 Issues Scoped Out

6.4.1 There are no further issues to be scoped out in addition to those discussed within **Section 7.3.36** to **Section 7.3.39** of the Scoping Report.

6.5 Questions to Consultees

- Q6.1: Do the consultees agree with the updated Cultural Heritage methodology set out within this Scoping Addendum?
- Q6.2: Do consultees agree with the proposed scope of the assessment, with reference to the amendments due to the revised access track?

7 Ecology

7.1 Baseline

7.1.1 Baseline ecological conditions to inform the design and assessment of the proposed development will be established through a review of existing ecological information relevant to the site and through ecological field surveys.

7.1.2 The updated baseline information sourced and reviewed to date, and presented below, primarily relates to the revised access track only.

7.1.3 Full details of baseline studies for the proposed development, including the revised access track and field survey methodologies and results, will be presented within the EIA Report.

Desk Study

7.1.4 The following key sources have been, or will be, consulted for existing ecological information in proximity to the proposed development:

- National Biodiversity Network (NBN) Atlas Scotland[10] for open data ecological records within 5 km of the site within the last 15 years (i.e. since 2011);
- NatureScot Sitelink[11] to confirm the location and qualifying features of designated sites within 5 km of the revised site boundary;
- Ancient Woodland Inventory (AWI)[12] for the presence of AWI sites within 5 km of the revised site boundary;
- Non-statutory Local Nature Conservation Sites (LNCS) database[13] within 5 km of the revised site boundary;
- Carbon and Peatland Map 2016[14];
- Wildcat Priority Areas[15] within 5 km of the site;

[10] NBN Atlast Partnership (2026) *National Biodiversity Network Atlas Scotland*. Available at: https://scotland.nbnatlas.org/.

[11] NatureScot (2026). *Sitelink* Available at: https://sitelink.nature.scot/home.

[12] Ancient Woodland Inventory (Scotland). Available at: https://www.spatialdata.gov.scot/geonetwork/srv/api/records/A091F945-F744-4C8F-95B3-A09E6EF6AE33.

[13] NatureScot (2026). *Local Nature Conservation Sites*. Available at: https://data.spatialhub.scot/dataset/local_nature_conservation_sites-is/resource/2a2fb277-f8be-498e-8339-06a179ed32d5

[14] Scottish Government (2024). *Scotland's Soils*. Available at: https://map.environment.gov.scot/Soil_maps/?layer=10#.

[15] NatureScot (2026). *Wildcat Priority Areas* Available at: https://opendata.nature.scot/maps/wildcat-priority-areas/explore

- Deer Distribution Survey by the British Deer Society[16];
- Saving Scotland's Red Squirrels website[17];
- SEPA Water Environment Hub[18] for watercourse classifications;
- SEPA Obstacles to Fish Passage[19] for barriers to fish migration; and
- relevant data presented in EIA Reports or technical reports for other nearby and relevant developments, including Clune Wind Farm, located along the revised access track for the proposed development.

NBN Atlas

7.1.5 A search of the NBN Atlas identified existing records (with open data) of the following protected and/or notable species within 5 km of the revised access track since 2011 (10 km for bat species), as shown in **Table 7.1**.

Table 7.1: National Biodiversity Network Records (2011 – 2026) for Protected and Notable Species within 5 km of the Revised Access Track.

Common Name	Scientific Name	Relevance	License	Rightsholder (Recorder)
Badger	*Meles meles*	Protected Species	CC-BY[20]	HBRG (D. Jardine, R. Scott, W. Macdougal, I. Maclennan, J. Teesdale, C. Du Feu, G. Fullarton)
Brown hare	*Lepus europaeus*	Protected Species (during the close season)	CC-BY, OGL[21]	HBRG (Michael Taylor, Sarah Woodfin), BTO
Brown long-eared bat	*Plecotus auritus*	Protected Species	CC-BY, OGL	HBRG (Adam Ritchie), NatureScot (Richard Koczy)
Common lizard	*Zootoca vivipara*	Protected Species	CC-BY	ARC (Ian Green)
Common pipistrelle	*Pipistrellus pipistrellus*	Protected Species	CC-BY, OGL	HBRG, NatureScot (Toni Koczy, Richard Koczy)
Common toad	*Bufo bufo*	Notable Species	CC-BY	HBRG (Hilary Swift)
Daubenton's bat	*Myotis daubentonii*	Protected Species	CC-BY	HBRG (Inverness Bat Group)
Mountain hare	*Lepus timidus*	Protected Species	CC-BY, OGL	HBRG (David Jardine, Neil Redgate, Nicole Dunn, Stephen Moran), BTO

[16] British Deer Society (2023). *Deer Distribution Survey*. Available at: https://bds.org.uk/science-research/deer-surveys/deer-distribution-survey/

[17] Scottish Squirrels (2024). *Sightings of Red and Grey Squirrels across Scotland*. Available at: https://scottishsquirrels.org.uk/squirrel-sightings/

[18] SEPA (2024). SEPA Water Environment Hub. Available at: https://www.sepa.org.uk/data-visualisation/water-environment-hub/

[19] Scottish Government (2026). *Obstacles to Fish Passage (SEPA WMS)*. Available at: https://marine.gov.scot/?q=maps/1746

20 Creative Commons with Attribution 4.0 (CC-BY) https://creativecommons.org/licenses/by/4.0/

21 Open Government Licence (OGL) https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/

Natterer's bat	*Myotis nattereri*	Protected Species	OGL	BCT (Steve Austin)
Otter	*Lutra lutra*	Protected Species	CC-BY	HBRG (Amanda Proud, Gus Jones), BTO
Red deer	*Cervus elaphus*	Notable Species	CC-BY, OGL	HBRG (Amanda Proud, David Jardine), BTO
Red squirrel	*Sciurus vulgaris*	Protected Species	CC-BY, OGL	HBRG (J. Teesdale, M. Ketcher, Stephen Moran, Willie Macdougal) Scottish Wildlife Trust, BTO
Roe deer	*Capreolus capreolus*	Notable Species	CC-BY, OGL	HBRG (Amanda Proud), BTO
Sika deer	*Cervus nippon*	Notable Species	OGL	BTO
Soprano pipistrelle	*Pipistrellus pygmaeus*	Protected Species	OGL	NatureScot (Richard Koczy)

7.1.6 The following invasive non-native species (INNS) were also returned by these search parameters, shown in **Table 7.2.**

Table 7.2: National Biodiversity Network records (2011-2026) for INNS within 5 km of the revised site boundary

Common name	Scientific name	Relevance	License	Rightsholder (Recorder)
American mink	*Neovison vison*	INNS	CC-BY[20], OGL[21]	Highland Biological Recording Group (A. Proud) BTO

Statutory Designated Sites

7.1.7 There are no statutory designations with ecological (non-avian) features within the site.

7.1.8 There are four statutory sites designated for ecological (non-avian) qualifying interests located within 5 km of the revised site boundary or with likely hydrological connectivity with the site, as summarised in **Table 7.3** and illustrated in **Figure 7.1**.

Table 7.3: Designated Sites with Ecological (Non-Avian) Qualifying Interests within 5 km of the site

Designated site	Qualifying ecological features	Condition of feature (and date monitored)	Distance from the **revised** site boundary
Slochd Special Area of Conservation (SAC)	Dry heaths	Unfavourable, recovering 30 March 2017	0.2 km
Kinveachy Forest Site of Special Scientific Interest (SSSI)	Native pinewood	Unfavourable, recovering 25 March 2024	2.5 km

Kinveachy Forest SAC	Caledonian forest	Unfavourable, recovering 25 March 2024	3.5 km
	Bog woodland	Unfavourable, recovering 3 February 2009	
River Spey (SAC)	Atlantic salmon (*Salmo salar*), freshwater pearl mussel (*Margaritifera margaritifera*), otter and sea lamprey (*Petromyzon marinus*)	Unfavourable, recovering (10 March 2015) Unfavourable, declining (27 October 2015) Favourable, maintained (19 August 2015) Favourable, maintained (9 June 2014)	3.6 km (with hydrological connectivity of *c.* 5.8 km)

7.1.9 Statutory designated sites considered within the Scoping Report include Loch Ruthen SAC and SSSI, and Creag nan Clag SSSI. This discussion is not repeated below. Designated sites within 5 km of the site or that are hydrologically connected to the revised access track, are discussed below.

7.1.10 The Slochd SAC is located approximately 0.2 km east of the revised access track and on the opposite side of the U2856 (Findhorn Bridge – Slochd Road), railway line, and A9 carriageway to the site. It is also separated from the site via roadside woodland shelterbelts. The Slochd SAC is elevated and upslope of the site and is designated for dry heath habitats. There is no hydrological connectivity between the site and Slochd SAC. There would be no direct impacts on the SAC, given distance, separation features and qualifying interests. Potential indirect effects would be limited to airborne dust or related airborne pollutants arising from revised access track construction, or track use during dry weather. However, with suitable and robust pollution prevention measures in place as part of the Construction Environmental Management Plan (CEMP), e.g. dust suppression, then it is anticipated any adverse effects on the SAC's conservation objectives for dry heath can be suitably mitigated/discounted and a likely significant effect from the proposed development on Slochd SAC can be ruled out.

7.1.11 Kinveachy Forest SAC and SSSI are designated for woodland features and are located 3.5 km and 2.5 km respectively from the revised access track (**Table 7.3**). Given the distance from the site and the respective qualifying features it is considered there is no connectivity with the proposed development. As such it is proposed to scope out potential effects from the proposed development on Kinveachy Forest SAC and SSSI.

7.1.12 The River Spey SAC is designated for freshwater pearl mussel (FWPM), sea lamprey, Atlantic salmon and otter. Atlantic salmon and sea lamprey are migratory species, and the life cycle of FWPM is largely dependent on the presence of a population of Atlantic salmon. The SAC is located 3.6 km south-east of the site, within the Spey hydrological catchment. The site is located entirely within the River Findhorn catchment, therefore, in the unlikely event of pollution effects negatively impacting local river water courses dissecting the access track, this would flow downstream in a west/north-westerly direction. As such, there is no hydrological connectivity to

the River Spey SAC and a likely significant effect from the proposed development on the River Spey SAC can be ruled out.

Ancient Woodland Inventory

7.1.13 A review of the AWI[12] identified a number of AWI sites are identified within 5 km of the revised site boundary (**Figure 7.2**). Five sites, which are clustered and several of which abut each other around Glenmazeran Forest and Creag Bheag, are directly intersected by the revised access track. The revised access track here generally follows existing tracks to be upgraded; however, smaller sections of new track may be required.

7.1.14 The AWI classes the majority of these areas dissected by the revised access track as Long-Established of Plantation Origin (LEPO), with some smaller stands of semi-natural woodland. The proposed development will seek to utilise the existing tracks here as much as possible, and ecological field surveys will gather further information on the type and character of the woodland in the area mapped on the AWI. At this stage, AWI woodland is scoped in for further assessment.

Local Nature Conservation Sites

7.1.15 There are no non-statutory designated sites, i.e. LNCS, within 5 km of the revised site boundary.

Scottish Soils Carbon and Peatland Map 2016

7.1.16 The *Carbon and Peatland Map 2016*[14] indicates that the revised access track passes through a range of potential peatland and soil types. The majority of the revised access track passes through Class 5[22] soils, with smaller sections that traverse Class 1[23] peatland, Class 3[24] peatland/soils, Class 4[25] soils and Class 0[26] mineral soil.

Wildcat Priority Areas

7.1.17 The Northern Strathspey Wildcat Priority Area is located 762 m east of the revised access track and site. The proposed development will not involve any habitat loss within the priority area and will seek to utilise the existing track as much as possible to limit potential construction disturbance. Desk-based and ecological field surveys will gather further information on wildcat within the area.

Deer Distribution Survey

7.1.18 The results of the 2023 Deer Distribution Survey[16] indicate that the following deer species are present in the general area of the site:

- red deer;
- roe deer; and
- sika deer.

[22] Class 5 – Soil information takes precedence over vegetation data. No peatland habitat recorded. May also include areas of bare soil. Soils are carbon-rich and deep peat.

[23] Class 1 – Nationally important carbon-rich soils, deep peat and priority peatland habitat. Areas likely to be of high conservation value.

[24] Class 3 - Dominant vegetation cover is not priority peatland habitat but is associated with wet and acidic type. Occasional peatland habitats can be found. Most soils are carbon-rich soils, with some areas of deep peat.

[25] Class 4 – Area unlikely to be associated with peatland habitats or wet and acidic type. Area unlikely to include carbon-rich soils.

[26] Mineral soil - Peatland habitats are not typically found on such soils (Class 0).

Clune Wind Farm

7.1.19 The revised access track will pass through an area that has already been subject to a suite of ecological field surveys as part of the Clune Wind Farm application[27]. The key baseline ecological information gathered from those surveys indicate:

- the habitats recorded within the Clune Wind Farm survey area that overlap with the revised access track appear to be primarily locally typical dry heath and blanket/modified bog communities;
- surveys found field evidence of otter, badger and water vole locally, but no evidence of pine marten, red squirrel or wildcat;
- bat static detector surveys identified the presence of common and soprano pipistrelle, *Myotis* sp. and *Pipistrellus* sp.; however, activity was deemed to be low; and
- fish habitat surveys indicated suitable habitat in a number of watercourses locally, but there were often barriers to migration in smaller watercourses.

Field Surveys

7.1.20 Further baseline information for the revised access track will be obtained from a suite of ecology surveys to be undertaken in 2026 across the respective survey area. The surveys to be conducted are summarised below:

- National Vegetation Classification (NVC) surveys, incorporating Phase 1 Habitat and potential Groundwater Dependent Terrestrial Ecosystem (GWDTE) habitat characterisation;
- peatland condition assessments;
- terrestrial protected species surveys (including daytime bat walkover (DBW));
- HSI of ponds to assess potential for great crested newt (GCN) (*Triturus cristatus*); and
- targeted fish habitat and electrofishing surveys.

7.1.21 Seasonal bat detector (Anabat) surveys following NatureScot et al. (2021) guidelines[28] have been undertaken for the proposed development in 2024. Seventeen Anabat detectors were deployed across the area encompassing the wind turbine infrastructure, between May and September 2024. The locations of the deployments were selected based on an indicative design layout and positioned such as to cover the areas where wind turbines are proposed to be located. Data gathered is considered to remain in date to inform EIA. It is not proposed to deploy additional static detectors for the revised access track. A DBW and associated ground level tree assessment (GLTA) surveys will provide information on the potential for bats along the revised access track and inform if any additional surveys are required, with respect to bats.

7.2 Amendments to Scope of Survey/Assessment and Methodology

7.2.1 Additional or revised guidance and policy updates for Scotland have been published in the interim between the Scoping Report and this Scoping Addendum. As such, in addition to those outlined in the Scoping Report, the following key pieces of legislation, planning policy and

[27] https://www.clune-windfarm.co.uk/planning-application/

[28] NatureScot, Natural England, Natural Resources Wales, RenewableUK, Scottish Power Renewables, Ecotricity Ltd, the University of Exeter & Bat Conservation Trust (BCT) (2021). *Bats and onshore wind turbines - survey, assessment and mitigation*. Available at: https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation.

guidance of relevance to ecology will be referred to during the completion of baseline studies and subsequent assessment:

- Scottish Government (2025) Biodiversity: Planning guidance[29];
- NatureScot (2023; updated 2026) Advising on peatland, carbon-rich soils and priority peatland habitats in development management[30];
- NatureScot (Version October 2025) General Pre-application and Scoping Advice to Developers of Onshore Wind Farms[31];
- NatureScot (2026) Planning and development: Enhancing biodiversity[32]; and
- Scottish Environment Protection Agency (SEPA) (2024) Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems[33].

7.2.2 The EIA Report for the proposed development will incorporate the following ecological study areas for the revised access track:

- designated sites: the site and a 5 km study area from the revised site boundary for statutory sites and non-statutory sites. Sites with downstream hydrological connectivity to the site are also considered (see **Figure 7.1** and **Figure 7.2**);
- habitats and potential GWDTE: the site plus any topic-specific buffers as necessary and as defined in guidance;
- protected species: the site plus any species-specific buffers as necessary and as defined in guidance;
- electrofishing surveys: watercourses within the site and downstream as deemed relevant; and
- cumulative assessment: the proposed development and a 5 km study area.

7.2.3 Consistent with the sections outlined in the Scoping Report, the EIA Report will include an Ecological Impact Assessment (EcIA). This will consider the potential direct, indirect, and cumulative effects that the construction, operation and decommissioning of the proposed development could have on any Important Ecological Features (IEFs) scoped into the assessment. The EcIA will be supported by technical appendices covering habitats, protected species, bats, fisheries, and an Outline Biodiversity Enhancement Management Plan (OBEMP). These will include details of survey methodologies, survey data, and outputs of any analysis.

7.2.4 As presented in more detail in the Scoping Report, effects on IEFs will be assessed in relation to the species' reference population or habitat extent, conservation status, range and distribution. The assessment of potential effects will be informed by Chartered Institute of Ecology and

[29] Scottish Government (2025) *Biodiversity: planning guidance*. Edinburgh: Scottish Government. Available at: https://www.gov.scot/publications/scottish-government-planning-guidance-biodiversity/.

[30] NatureScot (2026) *Advising on peatland habitats and carbon-rich soils in development management* (originally published June 2023; revised March 2026). Inverness: NatureScot. Available at: https://www.nature.scot/doc/advising-peatland-habitats-and-carbon-rich-soils-development-management

[31] NatureScot (2025) *NatureScot pre-application guidance for onshore wind farms* (Version October 2025). Inverness: NatureScot. Available at: https://www.nature.scot/doc/general-pre-application-and-scoping-advice-onshore-wind-farms

[32] NatureScot (2026) *Planning and development: Enhancing biodiversity*. Inverness: NatureScot. Available at: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-enhancing-biodiversity

[33] Scottish Environment Protection Agency (SEPA) (2024) *Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems*. Stirling: SEPA. Available at: https://www.sepa.org.uk/

Environmental Management (CIEEM) (2024)[34] guidance and NatureScot guidelines[5], and impact significance will be determined in line with the EIA Regulations[35].

Potential Sources of Impact

7.2.5 The assessment will consider the potential impacts associated with construction, operation and decommissioning of the proposed development as detailed below. Where appropriate, the construction and operational impacts will also be considered in a cumulative assessment.

7.2.6 Construction/decommissioning impacts:

- temporary and permanent habitat loss, alteration, fragmentation and drainage associated with the proposed development infrastructure;
- pollution impacts on watercourses within and downstream of the site;
- loss of shelter, breeding, or foraging habitat for protected species;
- risk of injury or death to protected species from collisions with increased construction traffic;
- visual and noise disturbance to protected species associated with construction activities; and
- displacement of deer.

7.2.7 Operational impacts:

- displacement of protected species from shelter, breeding, or foraging habitats around permanent infrastructure, including barrier effects;
- increased human presence during periods of maintenance; and
- habitat creation/restoration/enhancement to be delivered as part of the proposed developments Biodiversity Enhancement Management Plan (BEMP).

Approach to Mitigation

7.2.8 Where possible, significant impacts on ecological features will be avoided or minimised through the iterative design process. Such considerations will include but are not limited to:

- avoidance of statutory and non-statutory designated sites;
- avoidance of Class 1 peatland when locating proposed infrastructure insofar as practicable;
- avoidance of active priority peatland and blanket bog habitat and GWDTEs when locating proposed infrastructure insofar as practicable;
- maintaining buffers between infrastructure and any protected species protected features in line with appropriate guidance;
- maintaining a 50 m buffer between infrastructure and any watercourses, except where watercourse crossings are required (to be kept to a minimum); and
- design of the track length and alignment to reduce the extent of track where practicable and maximise use of existing tracks where possible.

7.2.9 The following good practice mitigation measures will be assumed to be in place for the purposes of the assessment:

[34] CIEEM (2024). *Guidelines for Ecological Impact Assessment in the UK and Ireland*. Version 1.3, updated September 2024. Available at: https://cieem.net/wp-content/uploads/2019/02/Combined-EclA-guidelines-2018-compressed.pdf.

[35] Scottish Government (2017) The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

- a Species Protection Plan (SPP) will be implemented as part of a Construction Environmental Management Plan (CEMP) during the construction phase to ensure that all reasonable precautions are taken to adhere to the relevant wildlife legislation;
- pre-construction and during-construction surveys will be undertaken by an Ecological Clerk of Works (ECoW), or suitably qualified ecologist, as part of the SPP. An ECoW will be present throughout the construction period; and
- a robust, site-specific CEMP will be implemented. This will set out how the Principal Contractor will manage the works in accordance with the commitments and mitigation measures detailed in the EIA Report, the SPP, statutory consents and authorisations, and industry good practice and guidance for environmental management, including appropriate pollution prevention measures, particularly in relation to watercourses.

7.3 Issues Scoped Out / In

7.3.1 In line with CIEEM guidance[34], detailed assessment is not required for features that are sufficiently widespread, unthreatened, and resilient to potential effects of the proposed development. Therefore, adverse effects on common and widely distributed habitats or species will be scoped out. Specifically, this includes habitats and species which do not fall within the categories subsequently listed, i.e., habitats not on Annex I to the Habitats Directive and species not on Annex II to the Habitats Directive and habitats or species not protected by other legislation (e.g., the Wildlife and Countryside Act 1981 (as amended), the Nature Conservation (Scotland) Act 2004 or the Protection of Badgers Act 1992).

7.3.2 It is proposed that due to lack of connectivity and/or distance from the site, and in respect to the nature of the qualifying features, statutory designated sites within 5 km of the site (**Table 7.3**) can be scoped out of detailed assessment.

7.3.3 Non-statutory sites including AWI sites that intersect with or are within close proximity of the proposed development are currently scoped in. Ecological field surveys and consultation will gather further information on these areas and inform any relevant assessments required.

7.3.4 At this stage terrestrial and aquatic protected species and Annex I and Scottish Biodiversity List (SBL) habitats cannot be scoped out until the ecological baseline surveys are complete and the presence and distribution of ecological features in relation to the planned infrastructure and activities associated with the proposed development are fully understood.

7.3.5 A summary of the features and impacts to be considered, and the phases for which they are likely to be scoped in or out for, are presented in **Table 7.4**.

Table 7.4: Summary of Features/Matters to be scoped in/out of Assessment

Features	Scoped in: Construction	Scoped in: Operation	Justification
Statutory Designated Sites	No	No	Effects on statutory designated sites are scoped out of the detailed assessment as no designated sites are within the revised site boundary, are distant to the proposed development (**Table 7.3**), nor considered to have connectivity to the site.
Habitats on Annex I to the Habitats Directive and Ancient Woodland	Yes	Yes	Habitats on Annex I to the Habitats Directive and Ancient Woodland cannot be scoped out until the ecological baseline surveys are complete.
Other Non-Statutory Designated sites[36]	No	No	Effects on remaining designated sites scoped out of the detailed assessment as no designated sites are within the revised site boundary, are distant from the proposed development (**Table 7.3**) and are not considered to have connectivity to the site.
Protected species (including bats)	Yes	Yes	Protected species cannot be scoped out until the ecological baseline surveys are complete.
Habitats not on Annex I to the Habitats Directive and species not protected by other legislation (e.g., Wildlife and Countryside Act 1981 (as amended))	No	No	Common and widely distributed habitats or species which do not fall within the categories listed in the feature column will be scoped out of the assessment.
Migratory salmonids and resident fish	Yes	No	Impacts on fish populations cannot be scoped out until the ecological baseline surveys are complete and the presence and distribution of species and suitable habitats in relation to the planned infrastructure and activities associated with the proposed development are fully understood.
Wild deer population	Yes	No	The desk-based study will collate relevant information on the deer populations in the locality to inform whether this should be scoped out or assessed further in the EIA Report.

7.4 Questions to Consultees

- Q7.1: Do consultees agree that the suite of field surveys planned and currently being carried out in 2026 in addition to a desk study are sufficient to inform a robust impact assessment?
- Q7.2: Do consultees agree that the methodology and scope of assessment is appropriate?

[36] i.e., excluding the sites listed on the Ancient Woodland Inventory.

- Q7.3: Do consultees agree with the features and statutory designated sites proposed to be scoped out from further detailed assessment?
- Q7.4: Are there any other relevant consultees who should be consulted, or other sources of information that should be considered?

8 Ornithology

8.1 Baseline

8.1.1 Baseline ornithological conditions to inform the design and assessment of the proposed development and identification of Important Ornithological Features (IOFs) will be established through a review of existing ornithological information relevant to the site and ornithological field surveys.

8.1.2 Full details of baseline studies for the proposed development, including the revised access track and the field survey methodologies and results, will be presented within the EIA Report.

Study Area

8.1.3 The study area for existing ornithological information will extend out to 20 km from the proposed development for statutory designated sites with ornithological interests, 2 km for species listed on Annex 1 of NatureScot guidance (NatureScot, 2025a)[37] and 6 km for eagle species, which is in accordance with NatureScot guidance (NatureScot, 2025b)[38].

Survey Area

8.1.4 Field survey areas have been defined based on proposed wind turbine layouts applicable at the time of survey and species or species group-specific buffers as set out in NatureScot guidance (NatureScot, 2025b). Survey areas have therefore evolved in response to changes in proposed wind turbine locations and ancillary infrastructure within the site, over the baseline survey period.

8.1.5 Ornithological field surveys covering the site were completed in August 2024. No dedicated baseline surveys have been undertaken along the revised access track; however, the relevant areas have already been subject to a suite of ornithological surveys in 2021, 2022 and 2023 as part of the Clune Wind Farm application. This data provides suitable spatial coverage of the revised access track and are considered sufficient to characterise baseline ornithological conditions for the purposes of the EIA. Accordingly, the Clune Wind Farm survey dataset will be used to inform the assessment of potential effects associated with the revised access track.

8.1.6 Approximately 3 km of the revised access track west of the River Findhorn, passing through Glenmazeran Forest, has not been subject to ornithological survey to date. To address this gap, complementary field surveys are anticipated to be undertaken during the 2027 breeding season. Depending on the project programme and submission timescales, the results of these surveys will

[37] NatureScot (2025a). *Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas*. Available at: https://www.nature.scot/doc/guidance-assessing-significance-impacts-bird-populations-onshore-wind-farms-do-not-affect-protected

[38] NatureScot, (2025b). *Recommended bird survey methods to inform impact assessment of onshore windfarms*. Available at: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms

either be incorporated into the EIA Report or provided subsequently as Supplementary Information.

Statutory Designated Sites

8.1.7 The Scoping Report identified ten statutory designated sites for nature conservation with ornithological qualifying interests located within 20 km of the site. The inclusion of the revised access track has extended the study area eastwards and resulted in the identification of a further 12 designated sites with ornithological qualifying interests. These are summarised in **Table 8.1** and set out on **Figure 8.1.**

Table 8.1: Additional Ornithological Designated Sites within 20 km

Designation	Distance (km)	Qualifying Features
Loch Vaa SPA	11.4	Slavonian grebe (breeding)
Loch Vaa SSSI	11.4	Slavonian grebe (breeding) Goldeneye (breeding)
Alvie SSSI	13.4	Goldeneye (breeding)
North Rothiemurchus Pinewood SSSI	15.1	Capercaillie (breeding) Osprey (breeding) Scottish crossbill (breeding) Crested tit (breeding) Breeding bird assemblage[39]
Abernethy Forest SPA	14.5	Capercaillie (breeding) Osprey (breeding) Scottish crossbill (breeding)
Abernethy Forest SSSI	14.5	Capercaillie (breeding) Osprey (breeding) Scottish crossbill (breeding) Crested tit (breeding) Breeding bird assemblage[40]
Cairngorms SPA	15.1	Capercaillie (breeding) Dotterel (breeding) Golden eagle (breeding) Merlin (breeding) Osprey (breeding) Peregrine (breeding) Scottish crossbill (breeding)

River Spey – Insh Marshes SSSI [39] Including black grouse, redstart, spotted flycatcher and tree pipit.

[40] Including dotterel, golden eagle, merlin and peregrine.

Designation	Distance (km)	Qualifying Features
Cairngorms SSSI	15.1	Dotterel (breeding) Ptarmigan (breeding) Golden eagle (breeding) Snow bunting (breeding) Breeding bird assemblage[41]
River Spey – Insh Marshes SPA	15.7	Osprey (breeding) Widgeon (breeding) Wood sandpiper (breeding) Spotted crake (breeding) Hen harrier (non-breeding) Whooper swan (non-breeding)
River Spey – Insh Marshes RAMSAR site	15.7	Osprey (breeding) Widgeon (breeding) Wood sandpiper (breeding) Spotted crake (breeding) Whooper swan (non-breeding)
River Spey – Insh Marshes SSSI	15.7	Osprey (breeding) Whooper swan (non-breeding) Breeding bird assemblage[42]
Craigmore Wood SPA	18.7	Capercaillie (breeding)

8.1.8 In review of each designation's qualifying interests, location and spatial separation from the revised access track, there is considered to be no potential for connectivity with these designations.

8.2 Amendments to Scope of Survey/Assessment and Methodology

8.2.1 Additional or revised guidance and policy updates for Scotland have been published in the interim period between the Scoping Report submission and this Scoping Addendum. As such, in addition to those outlined in the Scoping Report, the following key pieces of legislation, planning policy and guidance of relevance to ornithology will be referred to during the completion of baseline studies and subsequent assessment:

- *Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas* (NatureScot, 2025a[43]);
- *Recommended bird survey methods to inform impact assessment of onshore wind farms* (NatureScot, 2025b[44]);

[41] Including merlin, peregrine, golden plover, dunlin, purple sandpiper, Scottish crossbill, capercaillie and crested tit.

[42] Including wigeon, shoveler, goldeneye, redshank, snipe and curlew.

[43] NatureScot (2025a) Guidance note: *Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas*. Inverness: NatureScot. Available at: https://www.nature.scot/doc/guidance-note-assessing-significance-impacts-bird-populations-onshore-wind-farms-do-not-affect

[44] NatureScot (2025b) *Recommended bird survey methods to inform impact assessment of onshore wind farms.* Available at: Recommended bird survey methods to inform impact assessment of onshore windfarms | NatureScot

- *General pre-application and scoping advice to developers of onshore wind farms* (NatureScot, 2025c[45]); and
- *Scottish Biodiveristy List* (2025)[46].

8.2.2 Whilst account will be taken of the above policy and guidance updates, the general survey, assessment and impact evaluation methodology remains consistent with that presented in the Scoping Report and no material changes to the assessment approach are proposed.

8.3 Issues Scoped Out

8.3.1 CIEEM (2024) guidelines stipulate that it is not necessary to carry out a detailed assessment of impacts upon ornithological features that are sufficiently widespread, unthreatened and/or resilient to impacts of a development proposal.

8.3.2 As such, where ornithological features are unlikely to be so important in the context of the proposed development as to warrant a detailed assessment or where they would be unlikely to be significantly affected on the basis of established baseline information or avoidance of impact through scheme design, it is proposed that these are 'scoped out' of the impact assessment process.

8.3.3 On the basis of location and spatial separation from the proposed development, there is considered to be no potential for connectivity with any ornithological designated site. The potential for likely significant effects upon the following designations and their underpinning Ramsar sites and SSSIs will therefore be scoped out of consideration within the EIA Report:

- Loch Ruthven SPA;
- Loch Ashie SPA;
- Kinveachy Forest SPA;
- North Inverness Lochs SPA;
- Loch Vaa SPA;
- Abernethy Forest SPA;
- Cairngorms SPA; and
- River Spey – Insh Marshes SPA.

8.4 Questions to Consultees

- Q8.1: Do consultees agree that the methodology and scope of assessment for the revised access track is appropriate?
- Q8.2: Do consultees agree with the proposed approach to scope out the identified ornithological features and designated sites from further assessment?

[45] NatureScot (2025c). *General Pre-application and Scoping Advice to Developers of Onshore Wind Farms* [Online]. Available at https://www.nature.scot/doc/naturescot-pre-application-guidance-onshore-wind-farms

[46] Scottish Government (2025) Scottish biodiversity list. Available at: https://www.gov.scot/publications/scottish-biodiversity-list/

9 Geology, Hydrology and Hydrogeology

9.1 Baseline

9.1.1 The Scoping Report provided the baseline geological, hydrological and hydrogeological setting for the proposed development. The following sections describe the baseline geological, hydrological and hydrogeological setting for the revised access track and should be read in conjunction with the baseline setting outlined in the Scoping Report.

Geology and Hydrogeology

9.1.2 British Geological Survey[47] (BGS) mapping indicates that the revised access track is underlain by a series of layered and sheared geological units generally comprising semipelites and psammites. A part of the western extent of the revised access track is underlain by granodiorite of the Findhorn Pluton.

9.1.3 The bedrock is largely overlain by large extents of peat and till superficial deposits, with alluvium, river terrace deposits, and glaciofluvial sheet deposits noted around the River Findhorn and other smaller watercourses.

9.1.4 The peat, glacial superficial deposits and bedrock deposits beneath all areas of the site boundary are unlikely to contain significant amounts of groundwater. The bedrock deposits have been classified by the BGS[48] as a low productivity aquifer where small amounts of groundwater may be present within the near surface weathered zone or secondary fractures. Shallow groundwater may be present within the alluvial, river terrace and glaciofluvial deposits, however, groundwater is likely to be localised and in hydraulic continuity with adjacent watercourses.

9.1.5 The revised access track is shown by SEPA to be located within the Strathnairn, Speyside and Cairngorm and Findhorn and Muckle Burn Valleys groundwater bodies (ID: 150709 and ID: 150821 respectively). Both groundwater bodies were classified as Good in the latest reporting cycle (2024)[49]. All of Scotland's groundwater bodies have been designated as Drinking Water Protected Areas (DWPAs).

Soils and Peat

9.1.6 Soil mapping[50] shows that the revised access track crosses areas of peat, peaty podzols, peaty gleys, and an area of alluvial soils associated with the River Findhorn.

9.1.7 A review of the priority peatland mapping published by NatureScot[51] indicates that the majority of the revised access track is located within areas of Class 5 peatland. Approximately 2.8 km of the revised access track is located within areas of Class 1 and Class 2. A small section within the

[47] British Geological Survey, GeoIndex (onshore), available at https://www.bgs.ac.uk/map-viewers/geoindex-onshore/ [Accessed: August 2026]

[48] British Geological Survey Hydrogeological maps of Scotland, available at https://www.bgs.ac.uk/datasets/hydrogeological-maps-of-scotland/ [Accessed: August 2026]

[49] SEPA Water Classification Hub, available at https://informatics.sepa.org.uk/WaterClassificationHub/ [Accessed: August 2026]

[50] James Hutton Institute, National soil map of Scotland https://soils.environment.gov.scot/maps/soil-maps/national-soil-map-of-scotland/ [Accessed August 2026]

[51] Scottish Natural Heritage available at https://soils.environment.gov.scot/maps/thematic-maps/carbon-and-peatland-2016-map/ [Accessed August 2026]

centre of the revised access track, near the River Findhorn, is also shown to be located within areas of Class 3 and Class 4.

9.1.8 Class 1 and Class 2 peatland areas are considered nationally important carbon-rich soils, deep peat and priority peatland habitats. Class 3 and 5 peatlands are not considered priority habitats however soils may remain carbon-rich with areas of deep peat whilst Class 4 peatland areas are not considered to represent peatland habitats.

9.1.9 Peat depth probing surveys have been completed along the eastern extent of the revised access track as part of the proposed Clune Wind Farm, as shown on **Figure 9.1**. Peat depths along the majority of the access track, where it has been surveyed, are shown to have peat deposits of less than 1 m, however some depths of up to 2.5 m are noted in the central extent. The peat assessments completed for Clune Wind Farm also confirmed that peatland along the revised access track was typically modified, drained with some areas actively eroding.

Hydrology

9.1.10 Local hydrology is displayed on Figure 9.1: Hydrological Features and Figure 9.2: Watercourses and Flooding.

9.1.11 The revised access track is located within the surface water catchment of the River Findhorn, including the Glenmazeran Burn sub catchment. The revised access track will cross the River Findhorn and a number of tributaries of the river including the Glenmazeran Burn.

9.1.12 The Glenmazeran Burn and part of the River Findhorn surface water catchments have been designated as DWPAs.

9.1.13 The River Findhorn (SEPA ID: 23012 and 23014) and Glenmazeran Burn (SEPA ID: 23015) are monitored by SEPA and classified annually in accordance with the Water Framework Directive (WFD). All watercourses were classified in 2024 (the latest reporting cycle) with an overall Good status.

9.1.14 SEPA flood mapping[52] indicates that parts of the revised access track are noted to be at risk from surface water and fluvial flooding. Flooding is shown to be generally confined to immediate watercourse corridors or to form shallow (<0.3 m) overland flow paths towards the watercourses, with the exception of the area near the River Findhorn and Glenmazeran Burn where wider out of bank flooding is noted.

Designated Sites

9.1.15 Review of NatureScot SiteLink[53] website confirms that there is one designated site located within 500 m of the revised access track as follows:

- Slochd Special Area of Conservation (SAC) which is located approximately 200 m from the eastern end of the revised access track and is designated for dry heaths habitat. This is not considered to be a water dependent designated site and is located within a different surface water catchment to the revised access track.

[52] SEPA, Flood Maps [online] Available at https://www.sepa.org.uk/environment/water/flooding/flood-maps/ [Accessed: August 2026]

[53] NatureScot SiteLink [online] Available at: https://sitelink.nature.scot/home [Accessed: August 2026]

Private Water Supplies and Licenced Abstractions

9.1.16 A review of The Highland Council's private water supply database[54] indicates that there are five private water supplies within 500 m of the revised access track. As part of the Clune Wind Farm EIA a private water supply risk assessment was undertaken, which confirmed the presence of private water supplies within 500 m of the revised access track.

9.1.17 Review of SEPA records of Controlled Activity Regulation (CAR) and Environmental Authorisations (Scotland) Regulations (EASR) authorisations confirms that there are nine CAR/EASR authorisations or licences located within 500 m of the revised access track, however no licenced abstractions are recorded.

9.2 Amendments to Scope of Survey/Assessment and Methodology

9.2.1 Additional or revised guidance and policy updates have been published in the interim between the Scoping Report and this Scoping Addendum. As such, in addition to those outlined in the Scoping Report, the following key pieces of legislation, planning policy and guidance of relevance to geology, hydrology and hydrogeology will be referred to during the completion of baseline studies and subsequent assessment:

- In November 2025, the *Environmental Authorisations (Scotland) Regulations 2018* (EASR)[55] was extended to include water activities and replaced the CAR regulatory regime;
- Scottish Renewables (2025) *Guidelines on Streamlining Environmental Impact Assessments for Onshore Wind Farms*[2];
- Scottish Environment Protection Agency, 2024, *Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems*[33];
- Scottish Environment Protection Agency, 2024, *Guidance on Assessing the Impacts of Developments on Groundwater Abstractions*[56];
- Scottish Environment Protection Agency, 2026, *Assessing the impact of developments on peatland and carbon rich soils*[57]; and
- Scottish Environment Protection Agency, 2025, *Standing advice on peaty soil*[58].

9.2.2 In general, the survey, assessment and impact evaluation methodology remains consistent with that presented in the Scoping Report, however, it is proposed that the following amendments to the proposed scope of works outlined in the Scoping Report will be undertaken:

- It is proposed to reduce the proposed study area from the Scoping Report in line with new EIA Streamlining Guidance. It is proposed to reduce the study area to a 500 m buffer from the site boundary. This buffer reflects professional judgement and industry best practice

[54] The Highland Council Open May Data [online] Private Water Supplies. Available at: https://map-highland.opendata.arcgis.com/datasets/Highland::private-water-supplies [Accessed: August 2026]

[55] Scottish Environment Protection Agency (2018) Environmental Authorisations (Scotland) Regulations. Available online at EASR authorisations | Beta | SEPA | Scottish Environment Protection Agency [Accessed August 2026]

[56] Scottish Environment Protection Agency (2024) Guidance on assessing the impacts of developments on groundwater abstractions. Available online at guidance-on-assessing-the-impacts-of-developments-on-groundwater-abstractions.docx [Accessed August 2026]

[57] Scottish Environment Protection Agency (2026) Assessing the impact of developments on peatland and carbon rich soils. Available online at pan-on-peat-and-soils.docx [Accessed August 2026]

[58] Scottish Environment Protection Agency (2025) Standing advice on peaty soil. Available online at sa-on-peaty-soil.docx [Accessed August 2026]

regarding the implementation of appropriate mitigation measures and represents a reasonable Zone of Influence (ZoI) for potential effects on the hydrological and hydrogeological environment for onshore wind projects.

- It is proposed that a buffer of up to 50 m will be applied to watercourses shown on 1:10,000 scale mapping where excavations are proposed to be greater than 1 m. Where excavations of less than 1 m in depth are proposed, a buffer in accordance with SEPA's riparian corridor database[59] will be applied.
- It is expected that publicly available site-specific information collected as part of the Clune Wind Farm EIA can be used to inform the assessment. Gap analysis will be undertaken to identify any areas where further data may be required. Additional peat depth, peatland condition and private water supply surveys will be undertaken to ensure a comprehensive assessment is undertaken. Additional surveys to complete a schedule of watercourse crossings and review any areas of GWDTEs identified through the NVC survey will also be completed where no information has previously been collected.
- Potential impacts on peat will be included in the assessment, and the assessment will be supported by an outline peat management plan (OPMP), peat landslide hazard and risk assessment (PLHRA) and peatland condition assessment (PCA).
- Potential impacts on the River Findhorn and Glenmazeran Burn DWPAs will be included within the assessment.
- It is proposed that a simple screening of flood risk will be presented within the Geology, Hydrology and Hydrogeology EIA Chapter. It is not proposed to complete a detailed Flood Risk Assessment as part of the EIA assessment. The revised access track will require two new bridge crossings over the River Findhorn and Glenmazeran Burn which will require works within the mapped fluvial floodplain. It is proposed to include a commitment as part of the EIA to ensure that the bridges will be designed to accommodate the 200-year flood event plus an appropriate allowance for climate change which will be informed by hydraulic modelling. It is expected that this will be secured by a planning condition and details of the design and construction methods of the watercourse crossings will be approved prior to construction.

9.3 Issues Scoped Out

9.3.1 At this stage, it is proposed that the following can be scoped out of a detailed assessment:

- It is proposed to scope out effects on geology. While there will be effects arising from rock extraction for track construction and substation compound, these are limited in area and do not extend beyond the immediate development footprint. Potential effects on carbon rich soils and peat will be assessed in full.
- Effects on Slochd SAC. No development is proposed within the designated site, and the designated site is not considered to be water dependent. The SAC is also located within a different surface water catchment to the proposed development. As such, no direct or indirect effects on the SAC are anticipated.

9.3.2 Subject to the adoption of appropriate embedded mitigation it is anticipated that other impacts on geology, hydrology and hydrogeology receptors could be scoped out in line with EIA

[59] Scottish Environment Protection Agency (2025) Recommended Riparian Corridor layer for use in Land Use Planning. Available online at recommended-riparian-corridor-note.docx [Accessed August 2026]

Streamlining Guidance[2]. Any additional receptors which are proposed to be scoped out will be agreed with key consultees once the design of the proposed development has been agreed.

9.4 Questions to Consultees

- Q9.1: Do consultees agree with the changes to the proposed scope of the geology, hydrology and hydrogeology assessment?

10 Traffic and Transport

10.1 Baseline

10.1.1 The proposed development is located in a relatively rural part of the Scottish Highlands; however, construction and abnormal load access can be achieved from the A9 trunk road (T) corridor lying to the east of the proposed development.

10.1.2 The A9(T) will be the key strategic route for the importation of construction materials that will be required to construct the proposed development. It provides excellent linkage to the central belt of Scotland as well as a link to the key settlements of Inverness and Perth where materials and staff are likely to be drawn from.

10.1.3 Construction traffic including abnormal load vehicles would route from the A9(T) onto the U2856, which forms a junction with the A9(T) just north-west of the Slochd summit. This junction has recently been improved as part of the A9 dualling works and provides left in/left out access only.

10.1.4 The U2856 crosses the Highland Mainline Railway via a bridge approximately 270 m south-west of the A9(T). Proposals which form part of the Clune Wind Farm development include construction of a new crossing to replace the current bridge which is unsuitable for abnormal loads. The U2856 is considered a 'Consultation Route' for timber haulage. Construction traffic would exit the U2856 onto a network of tracks comprising approximately 10.2 km of upgraded track and 8.5 km of new track which would lead to the site. A short (approximately 500 m) section of the U2836 would be utilised in the vicinity of Glenmazeran Lodge.

10.1.5 Abnormal loads carrying wind turbine components are likely to be transported from the Port of Inverness to the site by road. The route would involve abnormal loads travelling along Stadium Road from the Port to join the A9(T) at the Longman Roundabout. The abnormal loads would then route south-east on the A9(T) before exiting onto the U2856 and continuing via the network of access tracks to the site. An abnormal loads assessment will be submitted as a technical appendix to the Traffic and Transport Chapter of the EIA Report, indicating the proposed abnormal load route and any required mitigation.

10.1.6 The Traffic and Transport Chapter of the EIA Report will provide a detailed description of each road link within the study area.

10.2 Amendments to Scope of Survey/Assessment and Methodology

Study Area

10.2.1 The study area for the assessment of traffic and associated environmental effects will consider receptors along the A9(T) corridor both north and south of the U2856 junction, the U2856 road, and the U2836 Road.

10.2.2 The U2836 provides local access to a small number of scattered rural properties and areas of estate land. Access for existing road users will be maintained and only a short 500 m section of the U2836 is proposed to be utilised. Therefore, effects are likely to be minor and temporary.

Data Collection

10.2.3 The scope of survey works relating to traffic and transport is likely to include the desk-based collation of traffic count data for the A9(T) which will be sourced from the Transport Scotland database.

10.2.4 Traffic data for the U2856 will be obtained from 2024 survey data published in the publicly available Chapter 10 Transport and Access of the Clune Wind Farm EIA Report.

10.2.5 Traffic surveys are not proposed for the U2836. Baseline traffic volumes on the route will be very low and construction traffic will only utilise a short section. A qualitative assessment of effects is proposed for this location based on likely impacts and receptors.

10.2.6 Road collision data for the last five years will be obtained from Transport Scotland for the A9(T) and from the Crashmap database for the U2856 and U2836.

Consultation

10.2.7 Consultation will be undertaken with both Transport Scotland and The Highland Council (THC) in relation to the strategic and local road networks respectively.

10.3 Issues Scoped Out

10.3.1 As indicated in the Scoping Report the following effects are proposed to be scoped out of the traffic and transport assessment:

Operational Stage

10.3.2 Once the proposed development is operational, the amount of traffic associated with a wind farm is minimal, principally relating to maintenance of the wind turbines and other operational infrastructure. It is estimated that on average there will be just a small number of 4x4s accessing the site on an infrequent basis. Therefore, the effect of vehicle movements during the operational phase will be negligible. In respect of traffic and transport, the operational phase of the proposed development will therefore not be assessed.

Decommissioning Stage

10.3.3 Consent for the proposed development is sought for 50 years, after which the wind farm will be decommissioned unless a further application is submitted for an operational extension. Traffic associated with the decommissioning stage is anticipated to be significantly less than that generated during construction; therefore, the construction phase is considered the worst-case

assessment to review the impact on the study area. Given the timescales involved and the likelihood for changes to the baseline situation during this period, the traffic and transport effects of wind farm decommissioning will not be assessed, although a commitment to reviewing the impact of this phase will be made immediately prior to decommissioning works proceeding.

10.4 Questions to Consultees

- Q10.1: Do consultees agree that the updated routes to be assessed within the study area are appropriate?
- Q10.2: Are consultees aware of any issues with the proposed abnormal load route?

11 Acoustics

11.1 Baseline

11.1.1 The acoustic environment around the site is expected to be typical of a rural area and consist of sounds generated by wind, watercourses, farm machinery, birds, distant traffic and occasional overflying aircraft. Additionally, noise from the operational Dunmaglass, Farr and Glen Kyllachy Wind Farms are likely to contribute to the acoustic environment.

11.1.2 Following a preliminary review, it is proposed that a baseline background sound survey is not required for the proposed development. As the site is influenced by several operational wind farms, including Dunmaglass, Farr and Glen Kyllachy, obtaining representative background sound data unaffected by wind turbine operation is unlikely to be achievable. Accordingly, representative existing background sound data from the surrounding area will be adopted for the assessment. These data sets are considered suitable for deriving noise limits for the assessed receptors, having been obtained and analysed in accordance with the principles and methodologies set out in ETSU-R-97[60] and the IOA Good Practice Guide[61] .

11.2 Amendments to Scope of Survey/Assessment and Methodology

11.2.1 New guidance relating to wind turbine noise for Scotland has been published in the interim between the Scoping Report and this Scoping Addendum. The Department for Energy Security & Net Zero (DESNZ) published the document *Assessment and Rating of Wind Turbine Noise* (ARWTN)[62] in June 2026. This document provides an updated framework for the assessment and rating of wind turbine noise and is intended to replace the previous ETSU-R-97 guidance.

11.2.2 Although ARWTN was published after the Scottish Government's Onshore Wind Policy Statement 2022[63] and is therefore not specifically referenced within current Scottish planning policy, the Policy Statement notes that *"…until such time as new guidance is produced, ETSU-R-97 should continue to be followed"*. As new guidance has now been published, the operational noise impact

[60] The Department of Trade and Industry (1997). ETSU-R-97: The assessment and rating of noise from wind farms.

[61] Institute of Acoustics (2013). A good practice guide to the application of ETSU-R-97 for the assessment and rating of wind turbine noise.

[62] The Department for Energy Security & Net Zero (June 2026) *Assessment and Rating of Wind Turbine Noise* (ARWTN).

[63] Scottish Government (December 2022). *Onshore Wind: Policy Statement* 2022

assessment will be undertaken in accordance with ARWTN. This approach has been confirmed with Environmental Health at The Highland Council (email dated 13 August 2026).

11.2.3 Except for the adoption of ARWTN for the operational wind turbine noise assessment, all other assessment methodologies and reference guidance outlined in the Scoping Report remain unchanged. This includes the assessment of operational noise from the proposed battery energy storage system (BESS) in accordance with BS 4142:2014+A1:2019[64] and the assessment of construction noise with reference to the procedures contained within BS 5228-1:2009+A1:2014[65] .

11.3 Issues Scoped Out

11.3.1 In accordance with ARWTN, operational infrasound, ground-borne vibration and broadband low-frequency sound do not require separate assessment as part of the planning process. ARWTN concludes that infrasound from modern wind turbines at typical receptor distances is below the threshold of perception, ground-borne vibration levels are significantly below human perception thresholds, and noise-sensitive receptors are suitably protected from broadband low-frequency sound through the application of the standard ARWTN noise criteria. These matters have therefore been scoped out of the assessment.

11.3.2 As discussed above in Section 11.1, a baseline background sound survey has been scoped out of the assessment. Consistent with the adopted assessment methodology, operational noise limits will be derived using representative existing background sound data, which is considered appropriate for the purposes of the ARWTN assessment.

11.1 Cumulative Effects

11.1.1 A cumulative operational noise assessment will be undertaken to consider the combined effects of the proposed development and other relevant wind farm developments. This will include operational, consented and planning-stage wind farms where these have the potential to contribute to cumulative noise levels at the assessed receptors.

11.2 Mitigation

11.2.1 The mitigation measures associated with construction and operational noise effects were described within the Scoping Report and remain unchanged. This includes the implementation of standard good practice measures during construction and the incorporation of appropriate separation distances between noise-generating infrastructure and neighbouring noise-sensitive receptors through the design process to minimise operational noise effects.

11.2.2 The wind turbines which comprise the proposed development will be operated in reduced sound modes if this is necessary to meet the acoustic limits derived in accordance with ARWTN.

11.3 Questions to Consultees

11.3.1 Do the consultees agree with the proposed assessment methodology?

[64] British Standards Institute (2019). BS 4142:2014+A1:2019 *Methods for rating and assessing industrial and commercial sound*.

[65] Code of practice for noise and vibration control on construction and open sites - Part 1: Noise', British Standards Institution, BS 5228-1:2009+A1:2014.

12 Socio-Economics

12.1 Baseline

12.1.1 As stated in the Scoping Report, the baseline description will be included in the proposed standalone socio-economic report. It will cover and compare the study areas of:

- Highland (The Highland Council area); and
- Scotland.

12.1.2 Since the Scoping Report submission, the population in Highland has fallen slightly, from 238,100 to 237,290 in 2023. The share of the population that is of working age (aged 16 – 64) has also fallen, with this share of the population now representing 59.9% of the total population across Highland, compared to a 63.3% average across Scotland[66].

12.1.3 In contrast to previous projections, in the most recent population projections the total population of Highland is projected to increase between 2023 and 2043, despite the number of young people and working-age individuals falling. These projections suggest an increase of more than 16,400 individuals aged 65 and over, increasing the share of this demographic from 24.6% of the population to 30.9% across Highland[67].

12.1.4 Remaining relatively consistent since the Scoping Report submission, the proportion of the population that is economically active in Highland is 78.9%, compared to 76.9% across Scotland as a whole. The unemployment rate across Highland is relatively low compared to the Scottish average (2.7% compared to 3.7%), indicating that Highland has a relatively tight labour market[68].

12.1.5 Human Health and Social Work Activities continues to be the sector supporting the largest share of employment across Highland (accounting for 15.7% of total employment, compared to 16.2% nationally), followed by Wholesale and Retail Trade (accounting for 12.6% of employment compared to the national average of 12.5%). Since Scoping Report submission, the share of employment in construction in Highland has risen to 7.8% from 6.7%, compared to 5.9% for Scotland[69].

12.1.6 The latest Growth Sector statistics[70] indicate that 15,000 people were employed in the sustainable tourism sector across Highland, representing more than 7% of the national sustainable tourism workforce, despite only accounting for 4% of the total population. This indicates the importance of tourism in the Highland region. In 2024, Highland welcomed 1.3 million domestic overnight visitors, who spent £350 million[71]. Highland also welcomed 534,000 international visitors, representing more than 12% of the total international visitors to Scotland, and spending £406 million[72] across the region.

[66] National Records of Scotland (2024), Mid-2023 population estimates; Office for National Statistics (2025) Population estimates – local authority based on single year of age.

[67] National Records of Scotland (2025) 2022-based subnational population projections for Scotland.

[68] Office for National Statistics (2025) Annual Population Survey Jan 2023-Dec2024 and Annual Survey of Hours and Earnings – resident analysis 2024.

[69] Office for National Statistics (2025) *Business Register and Employment Survey.*

[70] Scottish Government (2023) *Growth Sector Database.*

[71] Great Britain Tourism Survey, 2022-2024 (three-year averages used to account for small single-year sample sizes).

[72] International Passenger Survey, 2022-2024 (three-year averages used to account for small single-year sample sizes).

12.1.7 As outlined in the Scoping Report, the socio-economic and strategic baseline will be expanded on in the standalone report through a review of publicly available data sources. This will include:

- the population characteristics of the local area, including local and national demographic trends;
- deprivation statistics set within a national context;
- employment and economic activity in the local area within the context of the national economy;
- wage levels in the local area compared to the national level;
- the industrial structure of the local economy compared to the national level; and
- the role of the tourism sector in the local economy.

12.2 Amendments to Scope of Survey/Assessment and Methodology

12.2.1 Consistent with the sections outlined in the Scoping Report, the contents of the standalone socio-economic report are expected to include:

- introduction;
- strategic context;
- socio-economic context;
- maximising local economic benefits;
- assessment methodology;
- economic impact;
- tourism and recreation; and
- summary of findings and conclusion.

12.2.2 In line with the requirements of Policy 11 of NPF4, specifically paragraph (c), which states that "*development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities*", the socio-economic report will consider whether the proposed development is likely to maximise net economic benefits.

12.2.3 The report will consider what action has and could be taken in relation to each of the four themes outlined within the guidance published by Scottish Renewables[73], including:

- maximising the supply chain;
- skills and workforce;
- community empowerment; and
- natural environmental benefits.

12.2.4 In accordance with the guidance published by Scottish Renewables, it will be important to consider whether the applicant's approach to maximising benefits across these four themes is:

- place based - every project and every community is different so packages of benefits that are tailored around the needs and capacity of the community in question are likely to generate greater benefits than a standardised approach. This highlights the importance of identifying

[73]Scottish Renewables (2025) Maximising Net Socio-Economic Benefit of Renewable Energy Guidance and Reporting Framework.

and considering evidence regarding relevant economic, social and community issues and articulating a clear rationale for proposed interventions to maximise benefits;
- innovative - many of the benefits that have been realised by renewables to date have happened because of innovation at the project level. To maintain this culture of continuous improvement it is important that developers continue to innovate and collaborate with each other where multiple projects impact a community;
- collaborative - many of the benefits of renewable energy developments are not directly within the gift of developers. They will require input and support of others in the public, private and third sector to realise, making a collaborative approach essential;
- transparent - effective collaboration requires the parties involved to trust each other and an open and transparent approach is crucial for establishing this trust. Any report submitted to demonstrate compliance with Policy 11(c) should focus on the relevance, evidence for and rationale of proposed measures and benefits, rather than simply their financial value;
- flexible - a lot can change between project inception and completion, and these changes can make a big difference to the benefits ultimately realised. A flexible approach that responds positively to such changes is therefore important; and
- deliverable - providing communities with realistic expectations about what can be delivered during the construction and operation phase of a project will help achieve trust with relevant stakeholders. This will positively impact relationships for future renewable projects.

12.2.5 The socio-economics report will also include consideration of employment generation and any indirect or induced effects from the proposed development, as outlined in the Scoping Report.

12.2.6 Whilst there is no evidence of any relationship between wind farm development and trends in the tourism economy, it is recognised that tourism is important to the Highland economy. The socio-economic report will therefore consider whether there are any reasons to expect any impacts on the tourism economy.

12.3 Issues Scoped Out

12.3.1 Socio-economic assessments of wind farms have found no significant effects in terms of the EIA Regulations. Given these findings, there is no reason to expect significant effects for the proposed development, and it is therefore proposed to scope socio-economics out of the EIA.

12.3.2 This approach is recommended in the EIA Streamlining Guidance, which states that socio-economics should be considered in a separate, standalone report, which is not part of the EIA.

12.3.3 The objectives of the standalone socio-economic report will be to:

- quantify the potential economic impacts of the proposed development for the local and national economies;
- assess the potential for any effects on the local economy such as changes to tourism activity as a result of the proposed development; and
- assess whether the proposed development maximises net economic benefits.

12.4 Questions to Consultees

12.4.1 Consistent with those submitted in the Scoping Report, questions to consultees are as follows:

- Q12.1: Do you agree that the scope of the proposed standalone socio-economic report is appropriate?

- Q12.2: Are there specific socio-economic effects that should be considered?

13 Forestry

13.1.1 There are relatively few areas of forestry within the revised site boundary of the proposed development. There are no trees in close proximity to the proposed location of the wind turbine infrastructure, but two woodland blocks lying either side of the River Findhorn are within the route of the revised access track.

13.1.2 The forestry proposals will be prepared in accordance with the current industry best practice and guidance including, but not limited to:

- The Scottish Government's Policy on Control of Woodland Removal[74];
- Use of Trees Cleared to Facilitate Development on Afforested Land[75];
- The UK Forestry Standard[76;] and
- Scotland's Forestry Strategy[77].

13.1.3 The forestry reporting will be presented as a Forestry Technical Appendix forming a technical appendix to Chapter 2: Proposed Development Description. Existing forestry records will be analysed and augmented as required through further survey and assessment to document the full detail of the existing tree cover over the site. Analysis will be presented documenting any requirement to remove tree crops to accommodate the infrastructure of the proposed development.

13.1.4 Areas of woodland may need to be felled for the construction and use of the revised access track and the structure of the woodlands may therefore change, resulting in a potential loss of woodland area. This will be addressed through the re-design of the existing woodlands including, for example, replanting areas of existing open ground, replanting alternative woodland types, or the provision of compensatory woodland planting on an alternative site.

13.1.5 There is a presumption against permanent woodland removal within the UK unless it addresses other environmental concerns or delivers additional and clearly defined public benefits. The Scottish Government's Control of Woodland Removal Policy[74] records the assessment requirements and compensatory measures which should be considered when removing woodland cover and the requirements under this policy will be addressed within the EIA Report.

14 Other Considerations

14.1.1 The revised access track does not alter the baseline conditions or scope of assessment for topics scoped into the 'Other Considerations' section of the Scoping Report as set out in the bullet point list below. See also further suggested changes to the format of reporting associated with the below topics in **Section 15** following the issue of EIA Streamlining Guidance.

[74] Forestry Commission Scotland (2009) *The Scottish Government's Policy on the Control of Woodland Removal*. Available at: https://forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal

[75] SEPA (2014) *Use of Trees Cleared to Facilitate Development on Afforested Land*. Available at: use_of_trees_cleared_to_facilitate_development_on_afforested_land_sepa_snh_fcs_guidance-_april_2014.pdf

[76] Forestry Commission (2023) *The UK Forestry Standard*. Available at: https://www.gov.uk/government/publications/the-uk-forestry-standard

[77] Scottish Government (2019*) Scotland's Forestry Strategy*. Available at: https://www.gov.scot/publications/scotlands-forestry-strategy-20192029/

- Existing Infrastructure, Telecommunications and Fixed Links.
- Aviation and Radar.
- Climate and Carbon Balance.
- Shadow Flicker.
- Air Quality (to be addressed within relevant chapters of the EIA Report).
- Population and Human Health (to be addressed within relevant chapters of the EIA Report).
- Waste and Environmental Management (to be addressed within relevant chapters and Technical Appendices of the EIA Report).
- Major Accidents and Disasters (where risks have been identified due to the location of the proposed development or the nature of the works, these will be addressed within relevant chapters of the EIA Report).

15 EIA Report Streamlining: Proposed Amendments

15.1.1 Since the Scoping Report was submitted, Scottish Renewables have issued EIA Streamlining Guidance. This "sets out a series of recommended approaches, alongside topic based notes, to encourage more proportionate EIA for onshore wind proposals including a standardised approach to overall EIA structure and guidance on the content for a range of technical chapters." The overall aim of this guidance is to ensure more proportionate EIA reports.

15.1.2 It is proposed that the following changes to the content and structure of the EIA Report will be incorporated in accordance with the above streamlining guidance:

- A standalone 'Legislation, Policy and Guidance' section will not be included within each technical chapter. Instead, each discipline will clearly identify and reference the relevant legislation, policy and guidance within the assessment methodology, assessment criteria and/or assessment findings sections, as appropriate, to demonstrate that the assessment has been undertaken in accordance with applicable requirements.
- Technical reporting on existing infrastructure, telecommunications and fixed links (where required) will be provided as a supporting technical appendix to the EIA Report. Should no potential impacts on telecommunications be identified as a result of the proposed development, information on studies undertaken and results will be included in the Proposed Development Description Chapter with no requirement for an associated technical appendix.
- Technical reporting on aviation and radar will be provided as a supporting technical appendix to the EIA Report.
- The results of the climate and carbon balance assessment will comprise a technical appendix submitted as part of the EIA Report.
- The shadow flicker assessment (should it be required, dependent on distance from wind turbines in the finalised design to nearest residential receptors) will be provided as a supporting technical appendix to the EIA Report.

15.1.3 As a result of the above proposed changes to the content of the EIA Report, there will be no requirement for an 'Other Considerations' chapter of the EIA Report. The structure of Volume 2 of the EIA Report would therefore comprise:

- Chapter 1: Introduction

- Chapter 2: Proposed Development Description
- Chapter 3: Design Evolution and Alternatives
- Chapter 4: Landscape and Visual Impact Assessment
- Chapter 5: Cultural Heritage Assessment
- Chapter 6: Ecology Assessment
- Chapter 7: Ornithology Assessment
- Chapter 8: Geology, Hydrology and Hydrogeology Assessment
- Chapter 9: Traffic and Transport Assessment
- Chapter 10: Acoustic Assessment
- Chapter 11: Schedule of Mitigation

16 Next Steps

16.1.1 It is now anticipated that submission of a Section 36 application will be made to Scottish Ministers in early 2027. In advance of this, the following activities will occur:

- ongoing discussions with consultees following their Scoping Responses (where applicable) and to provide further information on baseline data and the proposed layout;
- public consultation events planned for Autumn 2026; and
- provision of the Gate Check Report to the Energy Consents Unit to confirm that the EIA Report is produced in accordance with the Scoping Opinion and forthcoming response to the Scoping Addendum.

16.1.2 Prior to the above and as a result of the information provided in this Scoping Addendum, we would welcome any further comment from consultees and the ECU.

Appendix A Figures

Figure Number	Title
Figure 1.1	Revised Site Boundary
Figure 1.2	Revised Access Track
Figure 6.1	Cultural Heritage Assets
Figure 7.1	Designated Sites within 5 km of the Site
Figure 7.2	Ancient Woodland Inventory Sites within 5 km of the Site
Figure 8.1	Ornithological Designated Sites within 20 km of the Site
Figure 9.1	Hydrological Features
Figure 9.2	Watercourses and Flooding

Appendix B Consultee List

Consultee Name	
Statutory Consultees	The Highland Council
	Historic Environment Scotland
	NatureScot
	SEPA
Internal Scottish Government Advisors	Transport Scotland
	Scottish Forestry
Non-Statutory Consultees	Aberdeen Airport
	British Horse Society
	BT
	Cairngorms National Park Authority
	Civil Aviation Authority
	Crown Estate Scotland
	Defence Infrastructure Organisation
	Fisheries Management Scotland
	Findhorn DFSB
	Findhorn, Nairn and Lossie Fisheries Trust
	Health & Safety Executive
	Highlands and Islands Airports Limited (HIAL)
	John Muir Trust
	Joint Radio Company
	Moray Council
	Mountaineering Scotland
	NATS Safeguarding
	RSPB Scotland
	Scottish Fire and Rescue Service
	Scottish Hang Gliding and Paragliding Federation
	Scottish Rights of Way and Access Society (Scotways)
	Scottish Water
	Scottish Wildlife Trust
	Scottish Wild Land Group
	Visit Scotland
	Woodland Trust
Other Interested Parties	Strathnairn Community Council
	Strathdearn Community Council