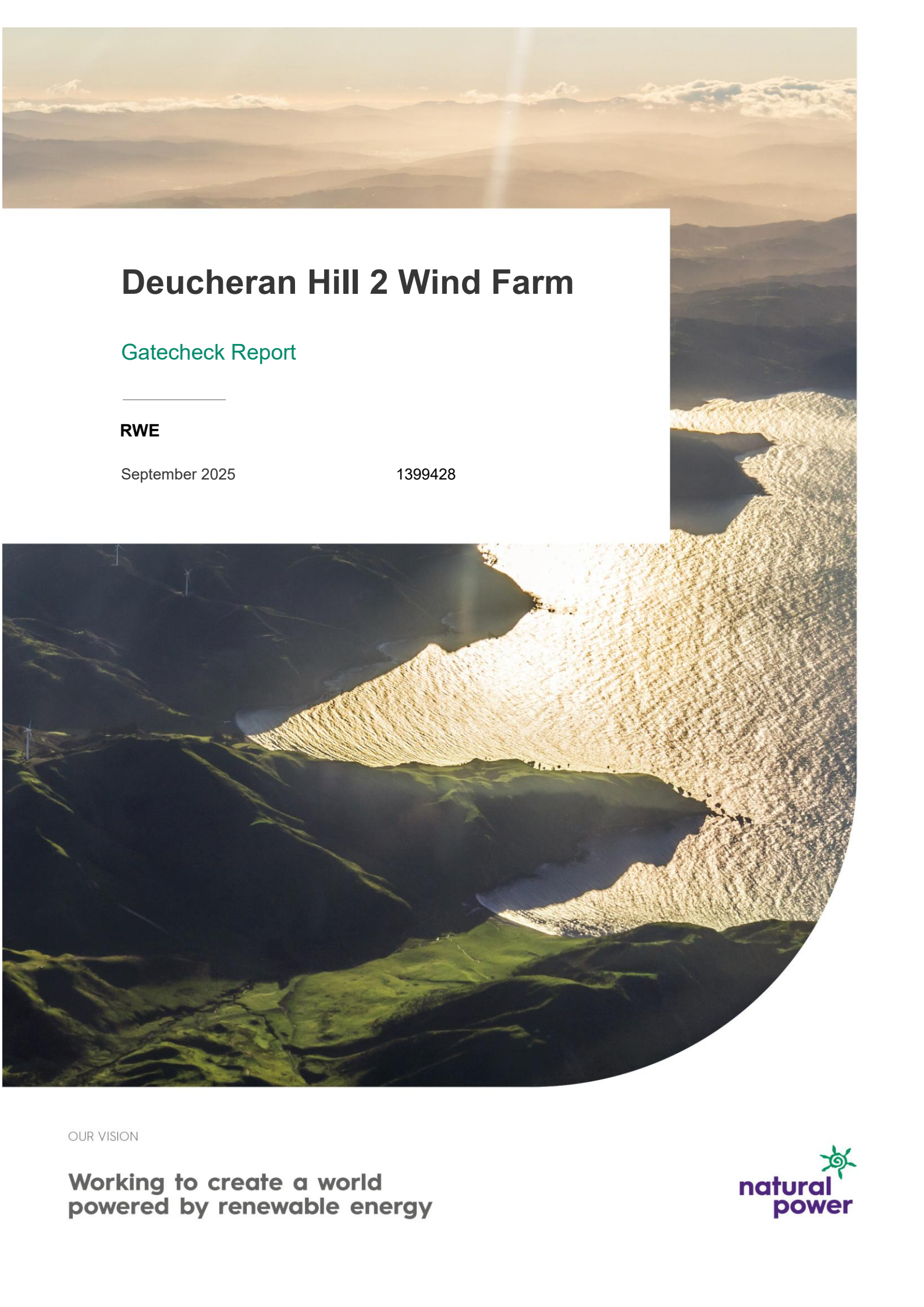


Appendix 2.3

Deucheran Hill 2 Wind Farm Gate Check Report



Deucheran Hill 2 Wind Farm

Gatecheck Report

RWE

September 2025

1399428

OUR VISION

**Working to create a world
powered by renewable energy**



Document history

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1. Introduction

To help design the best wind farm within the site's economic and environmental constraints, RWE Renewables UK Onshore Wind Limited (RWE) (The Applicant) has proactively engaged with statutory consultees, local people, communities and stakeholders from Scoping (March 2024) and continues to do so. Throughout the engagement process, the aim has been to inform, listen, answer, be accessible, where feasible add value and/or reduce burdens on consultees. To achieve this, a broad range of media has been utilised including local and community press, social media, community events, digital and online tools and direct mail, across the 18 month period.

In this report, The Applicant demonstrates that the opinions expressed by consultees which have been raised throughout the evolution of the proposed Deucheran Hill 2 Wind Farm have been considered in design iterations and that any remaining matters have been set out and discussed in the EIAR.

Note: A 'design chill' layout was prepared following these initial consultation events. The "design chill" layout will result in a further round of consultation. If any new issues are raised on the "design chill" layout, the outstanding issues will be addressed in the EIAR and supporting documents.

1.1. Key Project Facts

The Proposed Development site lies approximately 7 km northwest of Carradale, on the Kintyre Peninsula in Argyll and Bute within the administrative boundary of Argyll and Bute Council (ABC). The main land use within the site is commercial forestry.

The Proposed Development site comprises of the existing Deucheran Hill Wind Farm. The original Deucheran Hill Wind Farm, consented on the 8th June 2001 and operational in December 2001, comprises of 9 turbines with a range of 76 metres (m) to 93 m tip heights, 66 m rotor and an installed capacity of 15.75 MW. It was consented under the Town and Country Planning (Scotland) Act 1972 and in accordance with the statutory procedures set out in The Environmental Assessment (Scotland) Regulations 1988. In addition to the application, a separate application was submitted to the Secretary of State for Scotland under Section 37 of the Electricity Act 1989 for an overhead 33 kV line and associated works connecting the wind farm to the Scottish Hydro-Electric local electricity supply network. Deucheran Hill Wind Farm is due to be decommissioned in 2026.

The Proposed Development boundary has been drawn to accommodate the proposed turbines as well as proposed habitat management and biodiversity enhancement. It is expected that the turbine layout will change post scoping as a result of design iterations. However, it is not expected that the turbine development area will change.

The Proposed Development has been through a number of design iterations but will continue to evolve as the EIA progresses.

At time of writing, the Proposed Development comprises:

- Up to 14 wind turbines with mixed tip heights between 180 m and up to 220 m
- Turbine foundations and hardstandings;
- External transformer housing;
- Crane pads;
- Access tracks;
- Underground electricity cables;
- Battery storage;
- Permanent anemometry mast;
- Temporary borrow pits;
- Temporary construction and storage compounds and ancillary infrastructure;
- Site signage;
- Onsite substation and control building;

- Office and welfare facilities;
- Habitat Management Area;
- Temporary construction gatehouse; and
- Waste water and drainage attenuation measures (as required).

A Scoping Report was submitted to the Energy Consents Unit (ECU) on 23rd August 2024. A copy of this will be found in Technical Appendix 1.1 of the EIAR. The full Scoping Opinion was received from the ECU on 6th January 2025 and will be provided in Appendix 1.2 of the EIAR. The content of the Scoping Opinion informs the scope of the EIA undertaken for the Proposed Development. The Scoping Opinion, along with other assessments, was also used to inform the design evolution process and to determine the criteria applied to the “design chill” layout. As a result of the design evolution process, the Proposed Development was amended by reducing the original number of turbines proposed from 23 to 14 and mixed turbine heights from 180 m to 220 m to blade tip. The ECU was informed of the changes from the original scoping layout via email and meetings.

1.2. EIA Project Team

RWE is the leading power generator in the UK, with a diverse operational portfolio of onshore wind, offshore wind, solar, hydro, biomass and gas. We produce enough energy to power the equivalent of around 12 million UK homes.

Scotland is a key market for RWE, where they are involved in over 700MW of renewable electricity projects in operation or construction. RWE own / operate around 470MW of installed operational renewable capacity across 27 sites, including 15 hydropower, 10 onshore wind, 1 offshore wind and 1 biomass CHP projects. RWE plan to continue expanding their renewables portfolio in the country, with a further 231 MW across four onshore wind projects in construction, representing an important element of our wider ambitions across the UK.

RWE currently directly employ around 100 people in Scotland, either at their generation sites or at their offices in Perth and Inverness.

The Proposed Development has been designed by the Applicant in association with civil engineers from Natural Power (The Design Team). All members of The Design Team have an input into the EIA chapters in an iterative way to minimise environmental effects as much as possible with Natural Power coordinating the responses to produce the EIAR and associated EIA documentation.

Natural Power has been providing expertise to the renewable energy industry since the company was formed in 1995 and is one of the UK’s leading renewable energy consultants. Natural Power currently employs over 400 people working full time providing renewable energy services nationally and internationally. Testimony to Natural Power’s experience and ongoing commitment to competency and continual improvement, its Planning & Environment Department is accredited by the Institute of Environmental Management and Assessment. In addition, Natural Power also operates in formally accredited health and safety (IOSAS 18001), environmental (14001) and quality (9001) management systems. As well as development and EIA services, Natural Power also provides expert advice and due diligence consultancy, site construction management and site operation and maintenance. Thus, Natural Power is a competent, experienced consultant to co-ordinate and undertake EIA and to prepare the EIAR.

1.3. Structure of the EIAR

The EIAR will be prepared in accordance with the EIA Regulations and follows the structure presented in Table 1.1 below. Where relevant each EIAR chapter considers the baseline environment, the likely significant effects for each phase of the development and cumulative impacts.

Table 1.1: EIAR Structure

Volume	Heading	Description
1	Chapter 1: Introduction	Presents the Proposed Development and provides a brief overview of the Applicant and the EIAR.

Volume	Heading	Description
1	Chapter 2: Approach to EIA	Presents a methodology for environmental design and assessment of the Proposed Development. This is achieved by gathering baseline environmental data, outlining the description of the receptors, potential impacts and effects, mitigation of impacts during site design and a final assessment of the matrix of significance of residual environmental and human effects of the proposal.
1	Chapter 3: Site Selection and Design Evolution	Explains the site selection and the design evolution process that has resulted in the Proposed Development.
1	Chapter 4: Project Description	Provides a detailed description of the infrastructure associated with the Proposed Development.
1	Chapter 5: Climate Change, Legislative and Policy Context	Identifies the energy and land use policies and outlines the need for the Proposed Development and its benefits within the context of international climate change agreements and European, UK and Scottish renewable energy policy.
1	Chapter 6: Landscape and Visual	Provides an assessment of the Landscape and Visual Impacts of the Proposed Development including Residential Visual Amenity and Night-time effects.
1	Chapter 7: Ecology	Provides an assessment of the habitats and (non-avian) fauna present within the Proposed Development area and immediate surrounding environment.
1	Chapter 8: Ornithology	Provides an assessment of the potential effects upon avian species.
1	Chapter 9: Archaeology and Cultural Heritage	Provides an assessment of the potential effects of the Proposed Development upon cultural heritage assets.
1	Chapter 10: Hydrogeology, Hydrology, Geology and Peat	Assesses the effects on the hydrological, geological and hydrogeological environment by the Proposed Development, including private water supplies and peat.
1	Chapter 11: Noise	Provides an assessment of the potential noise effects of the Proposed Development.
1	Chapter 12: Traffic and Movement	Provides an indicative construction programme, load requirements and assesses the potential effects upon the transport network resulting from the Proposed Development.
1	Chapter 13: Socio-economics & Tourism	Provides an assessment of the potential socioeconomic and tourism effects of the Proposed Development.
1	Chapter 14: Aviation	Provides an assessment of the potential effects upon aviation and Ministry of Defence (MoD) interests of the Proposed Development.
1	Chapter 15: Other Effects	Provides an assessment of the of the potential effects upon forestry, communication operations and existing site infrastructure of the Proposed Development.
1	Chapter 16: Synergistic Effects & Summary of Mitigation and Residual Effects	Assesses the potential synergistic effects created by effects from different subject areas in combination and summarises the proposed mitigation and residual effects of the Proposed Development.
2a	EIA Figures	EIAR Figures except for LVIA
2b	EIA Figures	LVIA Figures and Visualisations

Volume	Heading	Description
3	Technical Appendices	Provide additional supporting documents and data which inform the EIA.
4	Non-Technical Summary	Provides a high-level summary of the EIA's results in terms that can be understood by a layperson.

Source: Natural Power, 2025

2. General Engagement: Deucheran Hill 2 Wind Farm

Public engagement for the Proposed Development is outlined in Table 2.1.

Table 2.1: Public Consultations

Group	Activity
Public Exhibitions	Public exhibitions were undertaken at: Carradale Village Hall on Tuesday 11th June 2024, 2 – 7 pm; Tayinloan Village Hall on Wednesday 12th June 2024, 2– 7 pm; and Pirnmill Village Hall on Tuesday 8th October 2024, 4 – 7 pm. A second round of public exhibitions were undertaken at: Carradale Village Hall on Tuesday 10th June 2025, 2 – 6:30 pm; Tayinloan Village Hall on Wednesday 11th June 2025, 2 – 6:30 pm; and Pirnmill Village Hall on Wednesday 18th June 2025, 2 – 6:30 pm
Adverts In Paper	<i>Exhibition 1</i> <i>Carradale and Tayinloan:</i> Argyllshire Advertiser - 31st May 2024 and 7th June 2024 Campbeltown Courier - 31st May 2024 and 7th June 2024 <i>Arran:</i> N/A. Targeted mail invitations were sent ahead of this exhibition. <i>Exhibition 2</i> <i>Carradale and Tayinloan:</i> Argyllshire Advertiser – 30th May 2025 Campbeltown Courier - 30th May 2025 <i>Arran:</i> Arran Banner – 6th June 2025
Community Council Engagement	There are two host communities that the Applicant has communicated with and liaised with extensively during the scoping and post-scoping period, ensuring that they were fully informed of the Proposed Development at an early stage and that they received appropriate notification regarding public exhibitions. The communities consulted include: East Kintyre Community Council; and West Kintyre Community Council. In addition, the following communities were notified of public exhibitions taking place and included in mailed updates: Tarbet & Skipness Community Council; Campbeltown Community Council; The Laggan Community Council; Gigha Community Council; and Arran Community Council.
Future Engagement	Community groups have continued to be informed about the progress of the development during the lead up to submission.

Group	Activity
	The Applicant will send a letter around the submission date to all local residents who had expressed an interest in the Proposed Development and who attended the public exhibitions and left their contact details, to notify them that the application and EIAR has been submitted and how it can be accessed.
Community Benefit	The Proposed Development would be able to provide support for community initiatives for the 40-year life of the wind farm, allowing local communities to invest in their long-term future. Community benefit payments would be £5,000 per installed MW of onshore wind. The community benefits are in line with the 2017 Scottish Energy Strategy, which strongly supports the provision of community benefits for renewable energy projects. The Applicant would like to continue to engage with the local community to establish if there would be interest in shared ownership of the Proposed Development.

Source: Natural Power, 2025

3. EIA Consultation Summary: Deucheran Hill 2 Wind Farm

3.1. Summary

The Applicant has proactively engaged with consultees from Pre-Application (January 2024) and continues to do so.

Throughout, the aim has been to inform, listen, answer, be accessible and, where feasible, add value and/or reduce burdens on consultees. Table 3.1 details views received through the consultation process, The Applicants responses and where these will be addressed in application.

No scoping responses were received from the following consultees:

- Argyll & Bute Council;
- Aberdeen Airport;
- Civil Aviation Authority;
- Crown Estate Scotland;
- Fire & Rescue Service;
- Argyll Fisheries Trust;
- John Muir Trust;
- Mountaineering Scotland;
- Oban Airport;
- ScotWays;
- Scottish Power Energy Networks (SPEN);
- Visit Scotland; and
- West Kintyre Community Council.

The Applicant stays in contact with Community Councils, where appropriate, with project updates to maintain transparency of decision making throughout the pre-application and EIA phase.

Table 3.1: Deucheran Hill 2 Wind Farm Consultations

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
Argyll and Bute Council	No response	LVIA consultants (Stephenson Halliday) reached out for confirmation that assessment viewpoints were acceptable. Email received 10th July 2025 confirming they had considered list and had no comment. Noise Consultants (Ion Acoustics) reached out to ABC Environmental Health Officer to invite them to noise monitoring properties. They declined this invitation as unavailable on date of visit. No further responses have been received.	N/A	See Volume 1, Volume 2a and 2b, Volume 3, Volume 4 and supporting documentation.
Historic Environment Scotland (HES)	We note the scoping report does not mention the Argyll and Bute Historic Environment Record as a source in the baseline description (section 13.2). This record is held by West of Scotland Archaeology Service WoSAS). We recommend that they should be consulted for advice on historic environment interests. We also note that an internal system of numbering historic	N/A	It is noted and the national designation numbers are used for all designated assets. Assets beyond 10 km where long-distance views are relevant to their setting have been assessed, and where these are scoped out, written justification will be provided. Where assessment of an asset's setting indicates that there could be significant impacts from the	Volume 1 Chapter 9: Archaeology and Cultural Heritage Volume 2a and 2b: associated figures and visualisations Volume 3: associated technical appendices

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	environment assets has been used, and that these numbers are only cross-referenced in the Gazetteer. We recommend that the national designation numbers are used for all designated assets to reduce the chance of errors. In the methodological discussion in the report (section 13.4), nationally important assets have been considered to 10 km distance. Assets beyond this were considered and scoped out. However, we recommend that assets beyond 10 km where long-distance views are relevant to their setting should be assessed, and where these are scoped out, written justification should be provided. Where assessment of an asset's setting indicates that there could be significant impacts from the proposed development, wireframes should be produced to help assess those impacts. Where the impacts are identified as significant, photomontages should be produced to illustrate the impacts. We have discussed appropriate visualisations further in our site-specific comments,		proposed development, wireframes will be produced to help assess those impacts. Where the impacts are identified as significant, photomontages will be produced to illustrate the impacts. Site visits have taken place to assets where impacts may be possible. Visualisations will be produced to allow for further assessment on the level of impact of listed monuments' settings and where significant impacts are predicted.	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	below. We note that the report states that 'the final list of visualisations will be informed by ZTV analysis, consultation with relevant consultee's and if possible, site visits'. Appropriate assessment of setting impacts will require site visits to assets where impacts may be possible. Please also note that setting impacts are possible for assets which are not in the ZTV, but where views towards the asset may include the development. Visualisations should be produced to allow for further assessment on the level of impact of the following monuments' settings. All visualisations should also take into account cumulative effects from nearby consented, operational, and proposed windfarms. • Killean, fort NE of (SM3179) • Carragh an Talaidh, chambered cairn, Brackley (SM189) • Grogport Old Manse, dun 180 m ENE of (SM3649) & Sundale,			

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	dun 275 m NE of (SM3643) • Garvalt, dun 500 m SW of (SM3740) • Auchengallon, cairn 150 m WSW of (SM90023) • Airds Castle, 235 m SE of Barncluith, Carradale (SM3177) • Dunan Muasdale, dun (SM3223) • Carradale, fort, Kilbrannan Sound (SM2180) On the basis of the information currently provided we recommend the following assets are also scoped into further the assessment and appropriate visualisations provided where significant impacts are predicted: • Skipness Castle and Kilbrannan Chapel (SM13225) • Moss Farm, Machrie Moor, stone circles, cairns, hut circles and fields (SM90207) • Machrie Farm, cairn, hut circles and cultivation remains 800 m S of (SM4576)			

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	• Moss Farm, cairn 870 m WNW of (SM90222) • Torr Rìgh Mòr, hut circles and cultivation remains S of (SM4414) • The Doon, fort and standing stones (SM4415)			
NatureScot				
Landscape and Visual Impacts				
North Arran NSA The North Arran NSA is located 6.7 km east of the site, we request that an Assessment of Effects on the Special Landscape Qualities (AESLQ)4 of the NSA is provided as part of the LVIA. SLQs of the North Arran NSA likely to be affected by the proposed development include but may not be limited to: • SLQ 5 A distinctive coastline with a rich variety of forms; • SLQ 7 An exceptional area for outdoor recreation; and • SLQ 8 The experience of highland and island wildlife at close hand.	Consultation on final viewpoint locations 3 rd July 2025 with NatureScot including full set of wirelines for revised list. NatureScot responded 9 th July 2025 confirming they were satisfied with proposed list of viewpoints.	North Arran NSA An AESLQ of North Arran NSA will be completed. Locally Designated Landscapes We have reached out to Argyll and Bute Council on these Aviation Lighting Aviation Lighting impacts will be considered in AESLQ. Cumulative Effects We have reached out to Argyll and Bute Council for advice. Responses to Questions for Consultees	Volume 1 Chapter 6: Archaeology and Cultural Heritage Volume 1 Chapter 14: Aviation Volume 2a and 2b: associated figures and visualisations Volume 3: associated technical appendices	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	When considering which other wind farm developments to include within the cumulative assessment, we consider that Argyll and Bute Council are best placed to advise. Responses to Questions for Consultees <u>45 km initial study area and 20 km detailed study area</u> -We agree that a focused 20 km study area would be proportionate for the assessment of landscape and visual effects. Although we note that a number of viewpoints are beyond 20 km and request that full consideration of potential effects is reported from these locations. <u>Assessment viewpoints used in LVIA</u> We request additional viewpoints from within the North Arran NSA from: • Imachar Point (NR864402); • Lochranza Ferry (Lochranza to Claonaig, Kilbrannan Sound); and • Beinn Nuis (NR955399). To help understand potential for night-time effects we request an additional night-time viewpoint from within the North Arran NSA for LVIA Viewpoint 11 Mullach Buidhe. Given the number size and scale of the proposed turbines and potential for significant adverse effects on the North Arran NSA it would be beneficial if wirelines for the North Arran NSA viewpoints could be provided at this stage to help us gain some understanding of potential effects. <u>Day-time and night-time photography and visualisations</u> We agree with the proposed methodology.		<u>45 km initial study area and 20 km detailed study area</u> – noted. Full consideration of potential effects from locations >20 km will be reported. <u>Assessment viewpoints used in LVIA</u> Additional viewpoints included in LVIA including additional night-time viewpoint. <u>Proposed approach to night-time assessment and the proposed night-time viewpoints.</u> When available, preliminary visible aviation lighting ZTV will be shared. Lighting strategy will be provided in detail in final application.	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	<u>45 km initial search area and inclusion of turbines under 50 m in height only within 5 km of the Proposed Development.</u> We agree with this approach and defer to Argyll and Bute Council on the consideration of cumulative schemes within the cumulative assessment. <u>Proposed approach to night-time assessment and the proposed night-time viewpoints.</u> To provide a considered response we would need some further understanding of the proposed lighting strategy. When available as the assessment progresses, it would be beneficial to have access to a preliminary visible aviation lighting ZTV. Furthermore, we request an additional night-time viewpoint from within the North Arran NSA for LVIA Viewpoint 11 Mullach Buidhe. <u>Matters proposed to be scoped out of the LVIA.</u> We agree that other NSAs and WLAs can be scoped out of the assessment given the intervening distance and unlikely potential for significant adverse effects. We would defer to Argyll and Bute Council with regards to locally designated landscapes to be considered in the LVIA.			
NatureScot cont.				
Ornithology				
	Kintyre Goose Roosts SPA Suggested mitigation that could be implemented so that the proposal will not adversely affect the integrity of the site might include: Required mitigation: Within the wintering period for Greenland white-fronted geese (October – March), no vehicle or pedestrian	Consultation re Kintyre Goose Roosts SPA and mitigations to be carried out by Ornithology Consultants (Avian Ecology).	Kintyre Goose Roosts SPA Ornithologists are continuing discussions re mitigations and acceptability. Red-throated Diver	Volume 1 Chapter 9: Ornithology Volume 2a: associated figures Volume 3: associated technical appendices (including CEMP and HMP)

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	movements will take place past Loch na Naich or within 600 metres either side of the loch during the period from one hour before sunset to one hour after sunrise. This is to avoid disturbance to Greenland white-fronted geese roosting at Loch na Naich, which form part of the Kintrye Goose Roosts Special Protection Area population. Sound of Gigha SPA We agree that this site can be scoped out for the purposes of the EIA. Red-throated Diver Turbines 9 and 10 should be moved further away from Loch a' Chromain and Loch a' Ghlinn Bhiglochs in order to reduce the potential for impacts on breeding red-throated diver. We recommend that turbines 9 and 10, and any infrastructure associated with them, are relocated so they are at least 750 m from these lochs. Any turbines that might include red-throated diver flights at collision risk height, including T22 and T23 for example, should also be reconsidered for relocation, to avoid potential mortality. Golden Eagle A survey conducted in 2023, picked up some golden eagle flights, and whilst largely showing avoidance of the existing turbine array at Deucheran Wind Farm, future nesting attempts could lead to a greater frequency of flights through the turbine envelope of the proposed Deucheran Hill 2 Wind Farm than evidenced so far. We note that GET modelling is proposed. The site is largely covered in forestry of varying age classes, but there are some open ridges to the southwest.		T9 and T10 have been removed from application design Golden Eagle GET modelling will be completed for Proposed Development Hen harrier Effects on Hen harrier are considered and effects will be addressed through a HMP for the site. The EIA will confirm where forestry cover will be retained and allowed to mature, where it will be felled and how subsequent habitats will be managed after felling. Black Grouse Any impacts anticipated will be addressed through the HMP.	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
Hen harrier Hen harrier are nesting at a number of locations within the site, with flightlines within the proposed turbine envelope. Habitats may remain or become suitable for nesting hen harrier if forestry is felled as part of the proposed development. Such effects could be addressed through a Habitat Management Plan for the site, that includes consideration of nesting hen harrier. The submitted EIA should provide clarity on where forestry cover will be retained and allowed to mature, where it will be felled and how subsequent habitats will be managed after felling. Black Grouse Potential impacts could be addressed through a Habitat Management Plan for the site, that includes consideration of breeding black grouse. Responses to Questions for Consultees <u>Comments regarding the EIA only concentrating on those receptors which may be subject to significant effects from the Proposed Development (either directly or indirectly)</u> We agree that the EIA should concentrate on those receptors that may be subject to significant effects from the proposed development, either directly or indirectly, alone or in combination with other projects.				

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	<u>Agreement of consultees with the list of receptors and impacts to be included within the EIAR.</u> The list of receptors and impacts to be included within the EIAR should include Kintyre Goose Roosts SPA. As detailed in our advice above and at Annex 1, Kintyre Goose Roosts Special Protection Area should be scoped in due to the potential for disturbance effects on the qualifying feature Greenland white-fronted goose. An appropriate assessment will be required. <u>Satisfaction of consultees regarding the suitability of the ornithological survey effort completed to date to provide a robust assessment of effects.</u> The ornithological fieldwork survey effort completed to date appears to be in accordance with the recommendations set out in our guidance.			

NatureScot cont

Ecology

Ecology

As certain surveys have not yet been undertaken, we can only offer general advice at this stage:

In respect of fish and freshwater pearl mussel, we note that the section of the Scoping Report dealing with these (pages 50-51) makes reference to these only in relation to their presence within the Turbine Development Envelope. Impacts on aquatic species can be experienced at significant distances downstream of their point sources. In considering these species, due regard must be had for any habitats supporting these species that are in 'hydrological connectivity' with the development proposal, whether they are

The EclA will concentrate on those receptors that may be subject to significant effects from the proposed development, either directly or indirectly, alone or in combination with other projects.

Operational effects on fish and freshwater pearl mussel will be considered.

Volume 1 Chapter 7: Ecology
Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat
Volume 2a: associated figures
Volume 3: associated technical appendices (including outline HMP, PMP and CEMP).

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
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distributed within or outwith the Turbine Development Area, including the full route of the proposed access track.

We defer to Argyll and Bute Council in respect of effects on Local Nature Conservation Sites.

Ecobat, at time of writing is available again, however advice is noted if during assessment becomes unavailable.

Responses to Questions for Consultees

Consultee comments regarding the EcIA only concentrating on those receptors which may be subject to significant effects from the proposed development

We agree that the EcIA should concentrate on those receptors that may be subject to significant effects from the proposed development, either directly or indirectly, alone or in combination with other projects.

Receptors and potential impacts proposed for inclusion in the EcIA, along with features to be scoped out, are outlined.

We consider that operational effects on fish and freshwater pearl mussel should also be scoped in. Maintenance and use of the turbines, access track and water crossings during the operational phase of the proposed development may have potential to impact on fish and freshwater pearl mussel populations.

If Ecobat remains offline at time of the EIAR, consultees are happy with the proposed method of assessment for bat activity

We suggest that EIA reports might explain the unavailability of EcoBat and that alternative analysis should attempt to reasonably infer the level of relative bat activity. Regardless of the analytical approach, we advise that data is still presented in the format

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
suggested at Appendix 1 of the guidance, which can be found on our website.				
NatureScot cont				
Hydrology				
Responses to Questions for Consultees		N/A	Noted	Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat Volume 2a: associated figures Volume 3: associated technical appendices (including outline HMP and CEMP).
<u>Agreement of consultees with the proposed scope of the Hydrology, Hydrogeology, Geology, and Peat assessment.</u> For features within or dependent upon surface waters of groundwater, we consider that the spatial scope of the study area should be based on an assessment of 'hydrological connectivity' rather than a standard 2 km buffer around "The Site".				
NatureScot cont				
Enhancing Biodiversity				
We advise that:		N/A	Application sets out the type and scale of enhancement we will deliver.	Volume 1 Chapter 7: Ecology Volume 1 Chapter 8: Ornithology
Development proposals should clearly set out the type and scale of enhancement they will deliver, ensuring that applications clearly distinguish between those elements mitigating or compensating for adverse effects and those delivering enhancement.			Where possible, we have prioritised on-site enhancement before considering off-site delivery following the Scottish Government draft guidance for this.	Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat Volume 2a: associated figures Volume 3: associated technical appendices (including outline HMP and CEMP).
Developers should prioritise on-site enhancement before off-site delivery. Where purely on-site enhancement is not possible, the Scottish Government draft guidance sets out further considerations for off-site delivery.			Timescales for securing enhancement have been outlined in application.	
It is also important that applications demonstrate that the enhancement is to be secured within a reasonable timescale and with reasonable certainty, including appropriate management and monitoring arrangements, and sustained for the future (preferably in perpetuity) in order to deliver a lasting legacy.			Information on predicted losses, and the proposed mitigation, compensation and enhancement should be included in application.	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	- Information on predicted losses, and the proposed mitigation, compensation and enhancement should be clearly set out, and also concisely summarised, in any application, so that this can be easily understood by decision makers. - Enhancement requires consideration of all biodiversity, not just the significant effects that are the focus of EIA.			
Scottish Environment Protection Agency (SEPA)	<i>Site Specific Comments</i> - In this case, where much of the site is on peat, we expect the application to be supported by a comprehensive site-specific peat management plan. - Provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses we do not foresee from current information a need for detailed information on flood risk. <i>Site Layout</i> Each of the drawings requested must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations,	Advice sought 05/09/2025 on peat impacts, approach to missing data, peat slide risk and GWDTE. Consultation ongoing.	A site specific peat management plan (PMP) will be submitted as part of planning application. 50 m buffer applied to all watercourses. <i>Site Layout</i> Drawings detail all proposed upgraded, temporary and permanent infrastructure. The layout has been designed to minimise the extent of new works on previously undisturbed ground. <i>Water Environment</i> Layout has been designed to minimise Impacts on local hydrology and watercourse crossings and to avoid other direct impacts on water features.	Volume 1 Chapter 3: Site Selection and Design Evolution Volume 1 Chapter 4: Project Description Volume 1 Chapter 7: Ecology Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat Volume 2a: associated figures Volume 3: associated technical appendices (including outline HMP, PMP and CEMP).

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	buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible. A comparison of the environmental effects of alternative locations of infrastructure elements may be required. <i>Water Environment</i> The proposals should demonstrate how impacts on local hydrology have been		<i>Flood Risk</i> Crossings have been designed to accommodate the 0.5% annual exceedance probability flows, or information has been provided to justify any smaller structures. It is not considered the development could result in an increased risk of flooding to a nearby receptor <i>Peat and Peatland</i> Colour coded figure showing peat depth survey results with peat probe locations is included in planning application along with figures showing interpolated peat depths and Peatland condition mapping. The Outline Peat Management Plan (PMP) will include: a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include	

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	minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors. The submission must include a set of drawings showing: a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50 m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works; c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all lochs and watercourses within 250 m and showing a site-specific buffer around each loch		a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; b) Details of proposals for temporary storage and handling of peat; c) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation. <i>GWDTE and Existing Groundwater Abstractions</i> A National Vegetation Classification (NVC) survey should be submitted which includes the following information: c) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m	

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	or watercourse proportionate to the depth of excavations. The information provided needs to demonstrate that a site specific proportionate buffer can be achieved. <i>Flood Risk</i> Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. <i>Peat and Peatland</i> The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation		and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it. d) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. <i>Forest Removal and Forest Waste</i> As forestry is present on the site, the site layout has been designed to avoid large scale felling. The submission will include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber. <i>Pollution Prevention and Environmental Management</i> The submission will include a schedule of mitigation.	

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	required. These plans should be overlaid on the following: a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4; b) Peat depth survey showing interpolated peat depths; c) Peatland condition mapping. The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1 m deep. The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided			

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	and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks. The Outline Peat Management Plan (PMP) must include: a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; b) Details of proposals for temporary storage and handling of peat; c) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation. <i>GWDTE and Existing Groundwater Abstractions</i>			

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	A National Vegetation Classification (NVC) survey should be submitted which includes the following information: a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100 m radius of all excavations shallower than 1 m and outwith 250 m of all excavations deeper than 1 m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it. b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. <i>Forest Removal and Forest Waste</i> If forestry is present on the site, the site layout should be designed to avoid large scale			

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	felling, The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber. <i>Pollution Prevention and Environmental Management</i> The submission must include a schedule of mitigation.			
Argyll District Salmon Fishery Board	We note that the proposed wind farm is located within the headwaters of the Carradale Water which support important populations of Atlantic salmon and other smaller catchments draining west that also support populations of sea trout. Chapter 11 of the Scoping Report rightly highlights the likely presence of fish within and downstream of the site, and we expect that surveys of fish habitats and fish populations are undertaken so that the developer and Argyll DSFB are fully informed prior to the next phase of the planning cycle. We also request that pre and post construction monitoring of	N/A	Surveys of fish habitats and fish populations have been undertaken and pre and post construction monitoring of fish populations and macroinvertebrates are proposed if the site is given permission to be developed.	Volume 1 Chapter 7: Ecology Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat Volume 2a: associated figures Volume 3: associated technical appendices (including outline HMP and CEMP).

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	fish populations and macroinvertebrates in these watercourses (as prescribed by Marine Directorate) should be undertaken if the site is given permission to be developed.			
The British Horse Society	Core Path C094, which forms part of the Kintyre Way, one of Scotland's Great Trails, passes through the site. In addition, forest tracks and rides, like those within and close to the site, are often ideal routes for equestrians and are likely to be used by local and visiting equestrians. Consideration should therefore be given to how access for all users, including equestrians, will be managed both during the construction phase and when the wind farm is operational. Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and semi-rural areas.	N/A	Impacts on access, core paths including the Kintyre Way and other tracks have been considered in assessment.	Volume 1 Chapter 4: Project Description Volume 1 Chapter 15: Forestry and Other Effects Volume 1 Chapter 16: Synergistic Effects and Summary of Mitigation and Residual Effects Volume 2a: associated figures Volume 3: associated appendices

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	Vehicles travelling two and from Deucheran Hill are likely to meet equestrians on the road and drivers should be advised of this risk.			
The Kintyre Way	N/A	Reached out following scoping submission to discuss buffers/mitigations/enhancements (19/11/2024).	No comments were received from The Kintyre Way. Buffers applied in line with other core paths and access tracks.	Volume 1 Chapter 4: Project Description Volume 1 Chapter 15: Forestry and Other Effects Volume 1 Chapter 16: Synergistic Effects and Summary of Mitigation and Residual Effects Volume 2a: associated figures Volume 3: associated appendices
BT	The conclusion is that the project indicated should not cause interference to BT's current and presently planned radio network. BT requires 100 m minimum clearance from any structure to the radio link path. If any changes are made to the proposed locations please let us know so we can reassess this.	N/A	BT will be consulted on submission of EIA with updated layout however. it is not expected that changes made will impact the radio link path and infrastructure remains a minimum of 100 m from path.	Volume 1 Chapter 3: Site Selection and Design Evolution Volume 1 Chapter 15: Forestry and Other Issues Volume 2a: associated figures Volume 3: associated appendices.
The Coal Authority	The site to which this submission relates is not located within the defined coalfield. On this basis	N/A	N/A	N/A

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	we have no specific comment to make.			
Ministry of Defence (MOD)	It has been identified that this development will have the following impacts upon defence operations: - In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. - To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is	N/A	Aviation safety lighting scheme proposed and included in planning application. Consultation ongoing with CAA for reduced lighting scheme.	Volume 1 Chapter 6: Landscape and Visual Volume 1 Chapter 14: Aviation Volume 2a and 2b: associated figures and visualisations Volume 3: associated appendices

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	submitted to ensure that structures can be accurately charted to allow deconfliction. - The development proposed includes wind turbine generators that exceed a height of 150 m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting. - As a minimum the MOD would request that the perimeter turbines are lit with 25cd and infrared COMBI lighting.			
The East Kintyre Community Council	We are extremely concerned about the cumulative impact of	Received feedback at public exhibitions and considered in design process.	We have included Carradale Point & Fort viewpoint as per request A cumulative impact including the other wind farms on	Volume 1 Chapter 6: Landscape and Visual

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	this application within the current landscape. The current Deucheran Hill windfarm is barely visible since it comprises of 9 turbines with tip heights of 76 m situated in the side of the interior valley – the proposed DH2 development has over twice as many turbines, reaching 3 x the height spread over a far wider area and cresting the hill shoulders of the Upland Mosiac. This is counter to the Landscape Wind Energy Capacity 2017 study. East Kintyre is home to coastlines designated Areas of Panoramic Quality within the LLA NatureScot designation, and within these APQ's has a number of Scheduled Monuments. Carradale Point & Fort is part of the East Kintyre APQ and a scheduled monument and visitor attraction. We therefore request that a viewpoint from the top of Carradale Point fort be added/included in the assessment of the impact that		Kintyre Peninsula will be included in planning application. An assessment of impact on socioeconomic and tourism will be included in EIAR.	Volume 1 Chapter 9: Archaeology and Cultural Heritage Chapter 13: Socioeconomics and Tourism Volume 2a and 2b: associated figures and visualisations Volume 3: associated appendices.

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	this development may have and also that the cumulative impact including the other windfarms (present & in pipeline, such as West Torrisdale) be included in any planning application submitted. We request a full assessment of the economic impact of the windfarm using a survey based on Kintyre tourists and encompassing the impact of this windfarm as a stand-alone and in conjunction with the other consented and scoped windfarms (of which 7 are being proposed at 180-230 m) on tourism attractions such as the Kintyre Way, Route 66, West Coast Water and the area's "Dark Skies".			
Edinburgh Airport	We have no objection/comment.	N/A	N/A	Volume 1 Chapter 14: Aviation
Fisheries Management Scotland (FMS)	Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that	N/A	Guidelines have been considered throughout planning and to be considered during construction and monitoring phases if consent granted.	Volume 1 Chapter 7: Ecology, Volume 1 Chapter 10: Hydrogeology, Hydrology, Geology and Peat Volume 2a: associated figures Volume 3: associated Appendices (inc. Outline HMP and CEMP)

Consultee	Scoping Response	Pre-submission consultation responses	Comments/RWE response	Addressed in EIAR
	these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.			
Glasgow Airport	The site is outwith the obstacle limitation surfaces and radar consultation area for Glasgow Airport. It is within instrument flight procedures safeguarding area, however, further assessment in this location will only be required for obstacles exceeding 300 m AGL. Our position with regard to this proposal will only be confirmed once the turbine details are finalized and we have been consulted on a full planning application, if necessary. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operational impact and cumulative effects.	N/A	Glasgow Airport will be consulted on full planning application.	Volume 1 Chapter 14: Aviation and associated figures (Volume 2a) and appendices (Volume 3)

Source: Natural Power, 2025

4. Conclusion

The Applicant has proactively engaged with statutory consultees, local people, communities and stakeholders throughout application process.

A broad range of media has been utilised including local and community press, digital and online tools as well as having a series of in person community exhibitions.

This has resulted in designing a wind farm that will add value and/or reduce burdens on local people, communities and stakeholders as the Applicant has listened to the feedback that has been received as a result of the engagement and consultation with both the local community and technical consultees.

The Applicant considers that any remaining matters that have not already been addressed through the iterative design process have been set out and addressed in the EIAR.

It is anticipated that the application will be submitted to the Energy Consents Unit (ECU) November 2025. It is anticipated that adverts will be agreed with the ECU two weeks prior to submission along with a consultee list.

The Applicant recognises the sensitivities of the Proposed Development and will continue to engage with consultees and communities' post-submission and throughout the development phase until a determination is reach by Scottish Ministers.



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