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2. Approach to the EIA

2.1 Introduction

- 2.1.1 Environmental Impact Assessment (EIA) is a process that identifies the likely significant environmental effects (both beneficial and adverse) of development proposals to assist the decision maker when considering and determining an application. Early identification of potentially significant environmental effects also leads to the identification and incorporation of appropriate mitigation, management and enhancement measures into the project design to avoid, reduce, and if possible, remedy these effects. As the Proposed Development will exceed the thresholds for wind farms set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations'), and as it is a scheme that could potentially result in significant environmental effects, an Environmental Impact Assessment (EIA) is required. It should be noted that a significant environmental effect does not necessarily equate to the refusal of an application for planning permission. It would be one factor which would need to be balanced against a broad range of factors in the decision-making process.
- 2.1.2 This chapter sets out the approach that has been used in the EIA for the Proposed Development. It provides an overview of the key stages that have been followed, in line with statutory requirements and good practice.
- 2.1.3 The chapter is supported by the following appendices which are referenced throughout the text:
- **EIA Report Volume 4: Technical Appendices:**
 - **Technical Appendix 2.1: Schedule of Mitigation, Good Practice, Enhancement and Monitoring.**

2.2 The EIA Process

- 2.2.1 The EIA Report presents the findings of the EIA process, with a focus being on the identification of the likely significant effects. The information contained in the EIA Report fulfils the requirements of the EIA Regulations and once submitted will enable the competent authority, in this case the Dumfries and Galloway Council (DGC), to make a decision, and indeed conclude whether the requirements of Section 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) ('the Act') have been met.
- 2.2.2 Regulation 5(2) of the EIA Regulations states that the following information is required in the EIA Report:
- A description of the Proposed Development comprising information on the Site, design, size and other relevant features of the Proposed Development;
 - A description of the likely significant effects of the Proposed Development on the environment;
 - A description of the features of the Proposed Development and any measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
 - A description of reasonable alternatives studied by the applicant, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the Proposed Development on the environment;
 - A non-technical summary (NTS) of the information referred to in sub-paragraphs (a) to (d);
 - Any other information specified in Schedule 4 of the EIA regulations relevant to the specific characteristics of the Proposed Development and to the environmental features likely to be affected.
- 2.2.3 The EIA Report has been prepared in accordance with the applicable EIA Regulations, advice and good practice, including:
- The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017;
 - Planning Circular 1/2017: The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017¹;

¹ Scottish Government (2017) Planning Circular 1/2017: Environmental Impact Assessment Regulations [online]. Available at: <https://www.gov.scot/publications/planning-circular-1-2017-environmental-impact-assessment-regulations-2017/documents/>

- NatureScot (formerly Scottish Natural Heritage (SNH) (2018) (5th Edition), A Handbook on Environmental Impact Assessment²;
- Institute of Environmental Management and Assessment (IEMA) (2017), Delivering Proportionate EIA³;
- Planning Advice Note 1/2013 (PAN 1/2013) Environmental Impact Assessment (2013) (amended in June 2017)⁴; and
- The Scottish Government Onshore Wind Turbines Planning Advice (2014)⁵.

2.2.4 This EIA Report provides a clear and concise assessment of the Proposed Development and its likely significant effects, including primary, secondary, direct, indirect and cumulative effects, on the natural, built and human environments. The EIA Report provides DGC, in consultation with statutory consultees and the wider community, with sufficient information to make an objective judgement as to the acceptability of the Proposed Development, within the context of national, regional and local planning and environmental policy.

2.3 EIA Methodology

2.3.1 Good practice in EIA is defined in a number of sources as set out above. The methods followed in this EIA Report have drawn on these sources to generate a robust assessment. The EIA Report preparation process adopted for the Proposed Development can be summarised as follows and is described further below:

- Scoping and consultation with statutory consultees, non-statutory consultees and the local community to identify the key issues on which the EIA should focus;
- Establishing baseline environmental conditions through desktop research and site surveys;
- Determining how effects could be avoided or reduced through design evolution (embedded mitigation);
- Identifying the likely significant effects of the Proposed Development and any proposed mitigation needed to address these effects (additional mitigation);
- Assessing the significance of residual environmental effects on the identified receptors against recognised or defined criteria following the application of additional mitigation;
- Describing how likely significant effects will be monitored (e.g., through conditions attached to a consent); and
- Reporting the process, results and conclusions.

Scoping and Consultation

2.3.2 Consultation has formed an integral part of the EIA Report preparation process, and the EIA team and the Applicant have contacted a number of interested parties over the course of the project to determine their views on the Proposed Development and to collect baseline information.

Scope of the EIA Report

2.3.3 The purpose of the EIA Scoping process is to ensure that the EIA focusses on the identification of likely significant environmental effects; identifies those effects which are unlikely to need detailed study; and provide a means to discuss and reach agreement with statutory and non-statutory consultees on the most appropriate methods of impact assessment. A 'Scoping Opinion' can be requested from the local planning authority on the information to be provided within an EIA Report under Regulation 17(1) of the EIA Regulations. On behalf of the Applicant, LUC submitted a request to DGC for a Scoping Opinion on 21st September 2023 (23/2032/SCO). This request was accompanied by a Scoping Report prepared by LUC, which set out a summary of the proposals; identified the issues proposed to be included in the EIA Report; and proposed an approach to the assessment of effects for each

² NatureScot (2018) Environmental Impact Assessment Handbook V5 [online]. Available at: <https://www.nature.scot/doc/handbook-environmental-impact-assessment-guidance-competent-authorities-consultees-and-others>

³ Institute of Environmental Management and Assessment (2017), Delivering Proportionate EIA: A collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice [online]. Available at: <https://www.iema.net/policy/ia/proportionate-eia-guidance-2017.pdf>

⁴ Scottish Government, 2013, Planning Advice Note 1/2013: Environmental Impact Assessment

⁵ Scottish Government (2014) Onshore Wind Turbines: Planning Advice [online]. Available at: <https://www.gov.scot/publications/onshore-wind-turbines-planning-advice/>

proposed topic area. DGC did not, however, provide an EIA Scoping Opinion within the statutory timescales, and the EIA was progressed on the basis of the content of the EIA Scoping Report, professional judgement and experience.

Topic Areas Scoped Out

- 2.3.4 PAN 1/2013 provides advice on the general requirements relating to the preparation and content of an EIA Report (formerly Environmental Statement (ES)) and states:

“Whilst every ES should provide a full factual description of the development, the emphasis of Schedule 4 is on the significant environmental effects to which a development is likely to give rise. Some effects may be of little value or no significance for the particular development in question. They will therefore need only very brief treatment to indicate that their possible relevance has been considered”.

- 2.3.5 Furthermore, PAN 1/2013 (as amended) notes that Scoping forms a key part of the EIA process, and that its purpose is to:
- Identify the key issues to be considered;
 - Identify those matters which can either be scoped out or which need not be addressed in detail;
 - Discuss and agree appropriate methods of impact assessment, including survey methodology where relevant; and
 - Identify any other project level assessment or survey obligations which may apply.
- 2.3.6 In line with the above guidance, where effects have been identified (whether at Scoping or during detailed assessment) as being not significant to warrant further assessment, these have been ‘scoped out’ and given only brief treatment in the relevant topic chapters. Effects scoped out of the EIA are detailed in **Chapters 5-12**. Topics scoped out are detailed below.

Population and Human Health

- 2.3.7 In reviewing the potential for human health effects, consideration has been given to the significance of primary effects identified throughout the EIA Report to determine if there could be ‘secondary effects’ on human health. Where primary effects are not predicted to be significant, e.g., operational and cumulative noise, shadow flicker etc, then there is not considered to be a potential health effect.
- 2.3.8 Health effects that could be a result of construction and operational noise and construction traffic accidents have not been considered in detail, as these effects have either been scoped out as primary effects or have been found not to be residually significant as primary effects.
- 2.3.9 Deterioration of water quantity and quality of public and private water supplies have been considered in **Chapter 9: Hydrology, Hydrogeology, Geology and Peat**. No private water supplies are hydrologically connected to the Proposed Development, therefore there is no opportunity for secondary effects on health.
- 2.3.10 Effects as a result of shadow flicker have been considered in **Chapter 4: Development Description and Technical Appendix 4.3: Shadow Flicker Assessment** for six properties. There are currently no UK standards which determine what is likely to be an acceptable level of shadow flicker occurrence or indeed what could constitute as a significant effect. It is therefore proposed that shadow flicker occurrence will be investigated should the Applicant receive a complaint from nearby properties, and where necessary mitigation measures will be implemented. As such, it is unlikely that nuisance caused by shadow flicker will cause health effects. The possibility that shadow flicker could induce photosensitive epilepsy has also been considered. Most wind turbines of the scale proposed have a maximum rotational speed of around 16-17 Rotation Per Minute (RPM). Given that the wind turbines would have three blades, the blade pass frequency (and therefore the frequency of any shadow flicker effects) will be up to approximately 0.85 flashes per second (hertz). This is significantly less than the 3 to 30 hertz frequency range generally thought to induce photosensitive epilepsy.
- 2.3.11 It is not considered that there will be a change to any wider determinants of health as a result of the Proposed Development. As such, potential effects on population and human health have been scoped out of detailed assessment.

Dust

- 2.3.12 With respect to dust effects during construction and operation of the Proposed Development: the Design Manual for Roads and Bridges (DMRB) states that the locations of 'sensitive receptors' within 200 metres (m) of construction areas should be identified and mitigation measures to reduce dust effects be applied. There are no properties within 200 m of where construction works are proposed. Notwithstanding, the Applicant will commit to adopting good practice measures for dust management during construction and will implement these through a Construction Environmental Management Plan (CEMP), thereby controlling and reducing any potential effects that dust generation may have on health. No significant effects relating to dust are therefore predicted. During operation of the Proposed Development, there will be limited dust-raising maintenance activities and vehicular movements to and from the Site will also be limited.

Major Accidents and Disasters

- 2.3.13 In accordance with the latest IEMA guidance⁸, it has been important to adopt a proportionate approach for this assessment, given that many events which could be classified as 'major accidents and disasters', and which could cause significant effects on the environment, are not relevant to the Proposed Development or its location. The Proposed Development is not located in an area with a history of natural disasters such as extreme weather events, and its construction and operation will be managed within the requirements of a number of health and safety related Regulations, including the Construction (Design and Management) Regulations 2015 and the Health and safety Work etc. Act 1974.
- 2.3.14 All other effects assessed in the EIA which could be deemed to cause a major accident or disaster have been assessed elsewhere, and these are deemed to be low likelihood but potentially high consequence events. These relate primarily to potential traffic accidents which have been assessed in **Chapter 11: Access, Traffic and Transport** and peat slide risk which has been assessed in **Chapter 9 and Technical Appendix 9.6: Peat Landslide Hazard and Risk Assessment**.
- 2.3.15 The guidance is clear that major accidents and disasters can also be scoped out where proposed design measures or compliance with legislation and best practice will minimise the likelihood of a major accident or disaster occurring. Specific to the Proposed Development, this relates to a failure of the structural integrity of a turbine(s) or a mechanical fault. Modern turbines are fitted with sensors which detect if wind speeds are too high to operate safely, resulting in their shut down. This prevents excessive wear and damage to the gearbox and reduces the risk of turbines catching fire, the occurrence of blade failure or even a failure of the structural integrity of the turbine itself. Turbines will also be constructed to very high design standards specified by the manufacturer and will be maintained on a regular basis to ensure that they are structurally sound.
- 2.3.16 The occurrence of wind turbines catching fire from suspected lightning strikes is also very rare, and there is no evidence that human life has been at risk from such events occurring in the past; assisted by turbine designs that include an embedded lightning protection system.
- 2.3.17 The Construction (Design and Management) Regulations 2015 have formed an integral part of the conceptual design of the Proposed Development. Any health and safety risks have been taken account of and their consideration reflected in the design. Surveys and investigations have been undertaken throughout the pre-consent phase to, as far as reasonably practicable, identify, manage and if possible, avoid any potential risks during construction.
- 2.3.18 All construction activities will be managed within the requirements of the Regulations and will also comply with the requirements of the Health and Safety at Work etc. Act 1974 as noted above. To further reduce possible health and safety risks, a Health and Safety Plan for the project will also be drawn up. All staff and contractors working on the construction will be required to comply with the safety procedures and work instructions outlined in the plan at all times.
- 2.3.19 To ensure that hazards are appropriately managed, risk assessments will be undertaken for all major construction activities, with measures put in place to manage any hazards identified.
- 2.3.20 With respect to turbine icing, the Scottish Government web-based renewables advice for onshore wind turbines states that "The build-up of ice on turbine blades is unlikely to present problems on the majority of sites. When icing occurs, the turbines' own vibration sensors are likely to detect the imbalance and inhibit the operation of the machines". In addition, the Applicant will implement measures to ensure the safety of workers and the general public

in relation to ice throw and ice fall, including notices throughout the Site alerting members of the public of the possible risk of ice throw and ice fall under certain conditions.

Consultation with Statutory and Non-Statutory Consultees

- 2.3.21 In addition to the EIA Scoping process, the EIA team has been in discussion with consultees regarding the proposals, to obtain baseline data and agree methods of assessment during the course of the EIA. These consultations are detailed in **Chapters 5-12**.

Public Consultation and Public Exhibitions

- 2.3.22 Public consultation is a key component of the EIA process. For 'Major' developments, Regulation 7 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) places a requirement on applicants to hold at least two public events whereby members of the public can make comments to the prospective applicant as regards to a proposal. Prior to the consultation events, the Applicant submitted a Proposal of Application Notice (PoAN) on 29th September 2023 to DGC in accordance with Regulation 6 setting out the proposed means of consultation and how/when this would take place. A copy of the PoAN was issued to Portpatrick Community Council, Stranraer, Ochtreure and Belmont Community Council and Stoneykirk Community Council.
- 2.3.23 Two rounds of in-person public exhibition events were carried out. The first round of three events was undertaken in November 2023 (in Leswalt, Stranraer and Portpatrick) while the second round of three events was undertaken in June 2024 at the same locations. These events were advertised in the local press, via a newsletter to residents living in the vicinity of the Site and on social media. The Applicant also wrote to local councillors, MPs/MSPs and community groups.
- 2.3.24 The consultation events provided the opportunity for members of the public to view the proposals (including visualisations), learn about the EIA process, community benefits and next steps for the project. An opportunity was also provided for members of the public to provide online feedback, complete a feedback questionnaire or speak to a member of the project team face-to-face (at the in person drop-in events).
- 2.3.25 Further details on public consultation are provided in the **Pre-Application Consultation Report (PAC) Report** which accompanies the planning application.

Baseline Characteristics

- 2.3.26 Part 3 of Schedule 4 of the EIA Regulations states that an EIA Report should include:

"A description of the relevant aspects of the current state of the environment (the "baseline scenario") and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of relevant information and scientific knowledge".

- 2.3.27 The purpose of the EIA is to predict how environmental conditions may change as a result of a development. This requires that environmental conditions now and, in the future, assuming no development on the Site, are established. These conditions are referred to as the 'baseline' and are usually established through a combination of desk-based research, site survey, consultation and empirical studies and projections. Together, these describe the current and future character of the Site and surroundings, and the value and vulnerability of key environmental resources and receptors.
- 2.3.28 Making predictions about how parameters such as land use, landscape, views and other environmental characteristics may change in the future relies on assumptions about future development and environmental trends. For this reason, where other development is not proposed in the vicinity of the Site, the baseline adopted for the EIA is normally taken as the current character and condition of the Site and surrounds, and the likely significant environmental effects of the Proposed Development are then assessed in the context of the current conditions alone.
- 2.3.29 It is accepted that the baseline conditions may gradually alter through time as a result of climate change which has the potential to alter the landscape and the baseline environmental conditions. However, these climate change effects are unlikely to materially alter the findings of the EIA. Further details are provided in **Chapter 12: Climate Change**.

- 2.3.30 Baseline conditions and the means by which these have been established, are out in **Chapters 5 to 12** of this EIA Report.
- 2.3.31 As natural processes and/or human activities can affect the baseline ('status quo'), it is important to establish future baseline scenario in the absence of the Proposed Development, i.e. the likely environmental conditions that will exist should the Proposed Development not be constructed. Establishing the future baseline scenario requires transparent decision making as to what natural process changes and/or changes as a result of human activity should be included or excluded from the future baseline scenario.
- 2.3.32 Consideration of the future baseline scenario which acknowledges the absence of the Proposed Development is described in **Chapters 5-12** of this EIA Report.
- 2.3.33 The planning permission for the eight turbine Larbrax Wind Farm was not implemented, therefore no wind farm exists at the Site. As such, the Site baseline is considered to be its current state with no wind farm.

Consideration of Reasonable Alternatives

- 2.3.34 The EIA Report is required to consider reasonable alternatives for the Proposed Development, as specified in Schedule 4, paragraph 2 of the EIA Regulations:

"A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects".

- 2.3.35 The EIA Report provides a description of the site selection and design evolution of the Proposed Development and the alternative designs that this process suggested, along with consideration of these alternatives in **Chapter 3: Site Selection and Design Strategy**.

Avoidance of Effects through Design and Good Practice

Embedded Design Mitigation

- 2.3.36 EIA is an iterative process which aims to ensure early consideration of environmental issues at all stages of project development. In this way, the findings from the EIA can be fed into the design process, to avoid, reduce and if possible, remedy adverse environmental effects. This approach has been followed in the design of the Proposed Development and is considered to represent 'embedded design mitigation', i.e., mitigation which has been incorporated into the design of the Proposed Development.
- 2.3.37 Where potentially adverse significant environmental effects were identified through environmental baseline surveys, or later in the design process, consideration was given as to how the design should be modified to 'design out' adverse significant environmental effects, i.e., through embedded design mitigation, or where this was not possible, to determine appropriate mitigation for any remaining significant adverse effects. This process is explained further in **Chapter 3** and in the subsequent assessment chapters (**Chapters 5 to 12**).
- 2.3.38 It should be noted that mitigation for one effect may result in the creation or increase of another effect, for example, moving a turbine to avoid an area of deep peat may result in the turbine being located in an area that is more visible to human receptors. Therefore, it is sometimes necessary to make compromises to strike a balance between potentially competing effects and produce a design which is considered, on balance, to be the most appropriate considering all factors.

Good Practice

- 2.3.39 The EIA Report also details good practice measures of relevance to each topic that will be employed during the construction and operational phase of the Proposed Development. Good practice is not considered as mitigation but the minimum standards which are expected to be implemented in accordance with best practice guidelines. As such, they are to be treated as an inherent part of the construction process and are considered during the course of the assessments.

2.3.40 **Technical Appendix 2.1** provides a consolidated list of mitigation, good practice, enhancement and monitoring for the Proposed Development which have been identified through the EIA process.

Identification of Likely Significant Effects

2.3.41 Part 5 of Schedule 4 of the EIA Regulations states:

“The description of the likely significant effects on the factors specified in regulation 4(3) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development”.

2.3.42 Each technical chapter contains a section that identifies the likely significant effects on the environment that may arise as a result of the construction and operation of the Proposed Development. Decommissioning is described, but not assessed in EIA terms. The significance of environmental effects is typically assessed by considering both the magnitude of the change (i.e., the size and duration of the effect) and the value/sensitivity of the environmental resource that experiences this effect (i.e. the receptor).

2.3.43 In accordance with the EIA Regulations, effects may be direct, indirect, primary, secondary or cumulative. Within these categories, they may also be short, medium or long term, permanent or temporary, beneficial or adverse. Direct (or primary) effects are changes to the baseline arising directly from activities that form part of the Proposed Development, for example, a localised increase in noise during construction. Indirect (or secondary) effects are those that arise as a result of a direct effect, for example, deterioration of water quality in a watercourse due to a discharge could have secondary effects on aquatic biodiversity.

2.3.44 Effects and receptors have been described using quantitative criteria wherever possible using those factors listed below. Where different terminology has been used, this is stated clearly in the relevant chapter.

- The nature of the effect, described as adverse, neutral or beneficial.
- The magnitude of the effect, based on a scale of major, moderate, minor or none.
- The likelihood of the effect occurring, based on a scale of certain, likely or unlikely.
- The duration of the effect, based on a scale of long, medium and short term.
- The reversibility of the effect, being either reversible or irreversible.
- The value of the receptor, based on a scale of international, national, regional, local and negligible.
- The sensitivity of the receptor to the effect, based on a scale of high, medium and low and in some instances negligible.
- The occurrence of the effect during the phased implementation of the project.

2.3.45 Each of the technical chapters provide the specific criteria, including sources and justifications, for quantifying the significance of effects⁶, and this is predominantly done by combining sensitivity of receptor and magnitude of change. Where possible, this has been based upon quantitative and accepted criteria/guidance together with the use of professional judgement and expert interpretations. The threshold at which effects are likely to be ‘significant’ is defined in each of the technical chapters where relevant.

2.3.46 Unless otherwise stated in methodologies set out in the individual assessment chapters, effects of ‘**Major**’ or ‘**Moderate**’ significance are considered to be ‘Significant’ in the context of the EIA Regulations. Each assessment chapter concludes with a summary of the likely significant effects identified. All likely significant effects identified in each assessment chapter are included in **Chapter 13: Summary of Significant Effects**.

2.3.47 As noted above, decommissioning effects have not been assessed because of the long timeframe until their occurrence (>35 years), the uncertainty in relation to future baseline conditions and the resulting difficulty in

⁶ This excludes aviation and shadow flicker as there are currently no relevant benchmarks or standards upon which to assess likely significant effects in EIA terms. As such, the purpose of these assessments is to understand the potential impact and what mitigation may be required (if necessary) to suitably manage these impacts.

predicting these effects with confidence. They are, however, considered to be similar to those of construction effects in nature but are likely to be of a shorter duration.

- 2.3.48 It is not the intention of the EIA Report topic chapters to provide a comparative assessment with the Consented Larbrax Wind Farm given that the Proposed Development is the subject of the planning application being submitted, is materially different in terms of design and needs to be considered on its own merits. The Consented Larbrax Wind Farm ES (2015) sets out the likely significant effects of the Consented Larbrax Wind Farm.

Interrelationship between Effects

- 2.3.49 Although the EIA Report is structured in standalone topic specific chapters, many of the considerations are interrelated, such as ecology and hydrology. As such, the interrelationship between potential effects between two topic areas is also be considered in accordance with the EIA Regulations and addressed in **Chapters 5-12**.

Cumulative Effects

- 2.3.50 As required by Part 5 of Schedule 4 of the EIA Regulations, the EIA Report considers the possible cumulative effects that a proposal may have with existing or consented developments. The EIA Regulations state that EIA Reports should include an assessment of:

“The cumulation of effects with other existing and/or approved development, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources”.

- 2.3.51 NatureScot guidance defines cumulative effects as “*the combined effect of a set of developments*”. These are typically the ‘additional’ effects caused by a proposed development together with other similar developments, or as the ‘total’ effect of a set of developments, collectively. Additional effects result from the incremental changes associated with the addition of a proposed development to a baseline which is already supporting similar developments that are considered to have similar effects, i.e. the cumulative effects of the contribution of a proposed development to the existing baseline. The ‘total’ effect is the combined effects of several developments, for example, several developments each producing insignificant effects may have a combined effect that is considered significant.
- 2.3.52 For the purposes of this EIA, and for the majority of topics, cumulative effects have been defined as the likely ‘additional’ effects that the Proposed Development may have on a given receptor in combination with other wind farms which are at application stage or are consented. Generally, schemes which are operational or under construction are considered as part of primary assessments (i.e. the assessment of the Proposed Development) given that they form part of the baseline environment. Schemes at EIA Scoping stage are not included due to the uncertainty that they will progress to an application, as well as the lack of quantitative data available for them which is otherwise required to enable a robust and meaningful cumulative assessment. In addition to assessing the additional cumulative effects of the Proposed Development in combination with other schemes, **Chapter 5: Landscape and Visual Impact Assessment** assesses combined cumulative effects of the Proposed Development, assuming that all current and future developments identified in the study area are constructed/become operational.
- 2.3.53 It should be noted that the specific wind farms which are included within the cumulative effect assessment varies from one technical chapter to another according to the particular effects which are under consideration, for example all of the cumulative developments within a 40 kilometre (km) radius are included within **Chapter 5**, however this approach is not appropriate for other chapters due to the potential receptors being more localised, thus requiring a smaller study area. All technical specialists were provided with the same cumulative data as was gathered to inform the assessment in **Chapter 5** to ensure consistency. This was then supplemented where required.
- 2.3.54 For the purposes of all EIA assessments, it is assumed that the existing three 15 m to tip operational turbines at Meikle Galdenoch Farm (10/P/1/0495) and the existing two 15 m to tip turbines at Meikle Larbrax (08/P/1/0240 and 10/P/1/0496) and will be removed prior to operation of the Proposed Development in agreement with the landowner. These five turbines are therefore removed from the existing baseline for the purposes of the EIA assessments.
- 2.3.55 The cut-off date for cumulative data collection was May 2024. Changes to the cumulative baseline have not been included after this cut-off date to allow time for the assessments, visualisations and figures to be prepared. Should additional schemes enter into planning after this date, then it will be for the EIA for those schemes to consider the Proposed Development cumulatively.

Additional Mitigation, Enhancement and Monitoring

2.3.56 Schedule 4, Part 7 of the EIA Regulations states that an EIA Report should include:

“A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.”

2.3.57 The EIA has identified where there are likely to be any significant effects, and where possible, taking into account other effects on other receptors, has identified the ‘additional mitigation’ which will be committed to and implemented to address these effects. Making a judgement on the likely effectiveness of the additional mitigation measures proposed are then documented within this EIA Report as ‘residual effects’.

2.3.58 For reference, all proposed additional mitigation, good practice, enhancement and monitoring measures are set out on a topic-by-topic basis in **Technical Appendix 2.1**.

Data Gaps, Assumptions and Uncertainty in Assessment

2.3.59 Part 6 of Schedule 4 of the EIA Regulations requires that EIA Reports provide:

“details of difficulties, (for example, technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved”.

2.3.60 Whilst any assessment limitations are discussed in **Chapters 5-12**, it is considered that this EIA Report contains adequate information to enable DGC and consultees to review and form a reasoned conclusion on the significant effects of the Proposed Development on the environment.

2.3.61 Each topic chapter also lists the relevant assumptions that have been made when completing the assessment. Again, it is not considered that these assumptions present limitations to understanding potential significant effects.

Competent Experts

2.3.62 Regulation 5(5)(a) and (b) of the EIA Regulations states that: *“In order to ensure the completeness and quality of the EIA report— (a) the developer must ensure that the EIA report is prepared by competent experts; and (b) the EIA report must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts”.*

2.3.63 As set out in **Chapter 1: Introduction, Technical Appendix 1.1: Statement of Expertise** includes a statement of competency, setting out the qualifications and experience of lead chapter authors.