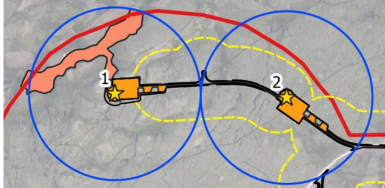
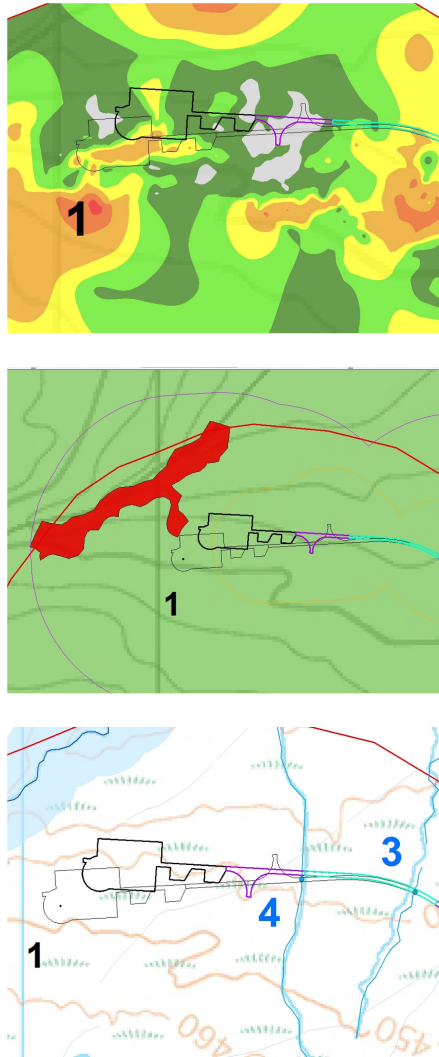
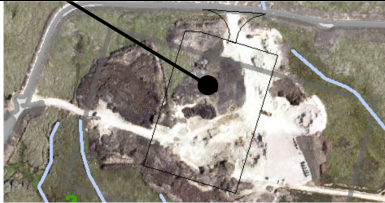

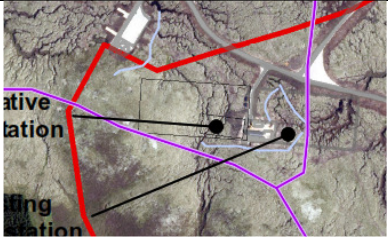


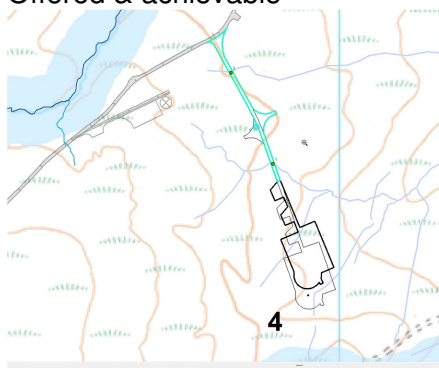
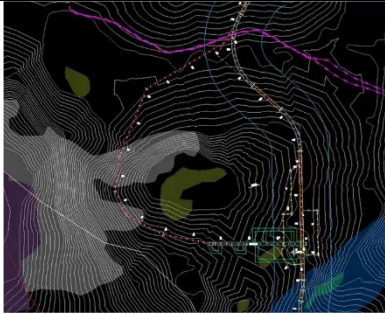
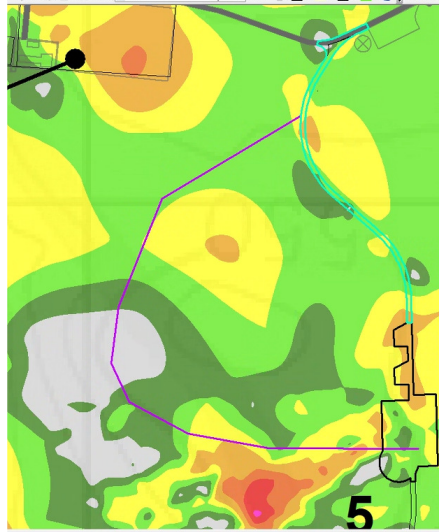
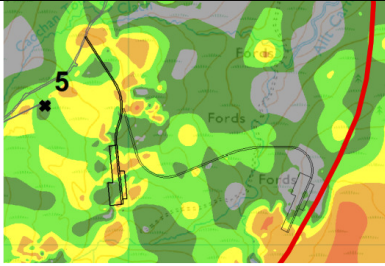


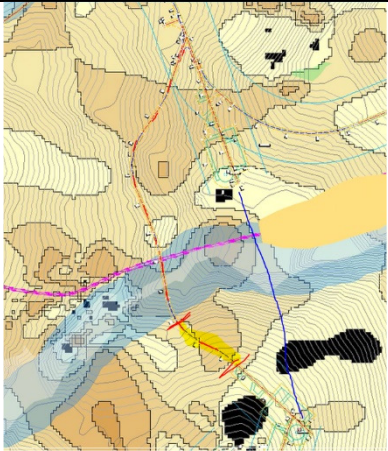
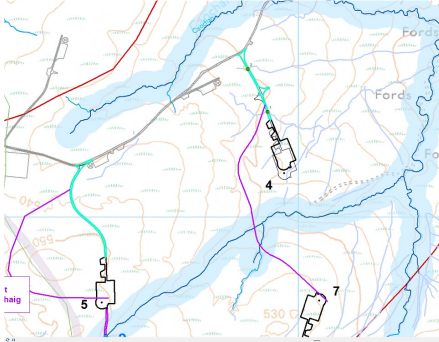
SEPA's initial comments - Issue for amendment or further environmental justification		Applicant's response to SEPA	Applicant reasoning	SEPA's further response 11 October 2022	Applicant response 12 October 2022
<p>Turbine on deep peat when there is an area to the north that is not deep peat.</p> <p>Note recent submission indicates that there are other environmental and technical constraints in this area – it may be helpful to understand these further (and if they relate to our interests they may effect our opinion)</p> <p>Turning T directly adjacent to watercourse.</p>	 <p>Figure inserted above shows location of GWDTE in relation to Turbine T1 sited for Proposed Development, acting as a constraint on micro-siting.</p>	<p>Turbine T1 relocated east to 287093 835457 to avoid as much peat as possible. This reduces the amount of peat that will be excavated in this location by 1,220m<sup>3</sup>, from the previous volume of ~7,370 m<sup>3</sup> to ~6,150 m<sup>3</sup>. The relocation also moves the infrastructure away from the GWDTE and the topography associated with the feature.</p> <p>The turning head has also been moved closer to the turbine hardstanding and away from watercourse and rotated to the south to avoid peat.</p>	<p>Offered &amp; achievable</p> 	<p>Supportive of proposed change</p>	
<p>Access track to turbine on deep peat although there is no peat and disturbed ground to the north and an existing track part of the way to the west.</p>		<p>This area (inserted left) was the location for the construction compound for the Operational Scheme. The Applicant does not have legal control to site <i>permanent wind farm infrastructure</i> (i.e. turbines or internal access tracks) in an area which is demarcated in a legal agreement for the siting of a decommissioning compound by the owner of the Operational</p>	<p>Not offered for reasons set out.</p>	<p>Reason relating to use of area as construction compound as an interim arrangement before that area becomes the decommissioning compound understood.</p> <p>Slightly less clear that some tracks may be designated as “for use in restoration” and that new development not have access to them, yet all the other track the new development does have</p>	 <p>The yellow rectangle above is the area defined as the 'Laydown Area' for turbine components for the Operational Scheme, and which the Applicant can only use for the location of a <i>temporary construction</i></p>

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		Scheme. The owner of the Operational Scheme has also identified this area as a 'laydown area' for turbine components (storing blades, nacelles, gearboxes etc.) in case urgent upgrades are required during the operational lifetime of the Operational Scheme. A temporary construction compound in this area for the Proposed Development is acceptable to the owner of the Operational Scheme.		access to. Even if the turbine cannot be located in the area where the decommissioning compound will be located can it not be located directly adjacent and can it not make use of one of the existing tracks to it?	<i>compound</i> for the Proposed Development. This shows why permanent infrastructure cannot be sited in this area (the black outline below the yellow rectangle is turbine T3 & crane pad/access track for reference); there is simply no space taking into account that the Applicant does not have legal control to site infrastructure in this area. This is also the most recent aerial image available, and shows how the land has recovered since construction of the Operational Scheme was completed.
Consideration only given to site being to the west of current substation – other areas might have shallower peat.  Possibility to extend existing substation or locate directly adjacent to it so no new disturbed peat.		The Applicant has no legal control for areas east of existing sub-station for Tom nan Clach Wind Farm. The location for the Proposed Development, adjacent to existing sub-station, mitigates the Landscape Visual impact by not creating any 'gaps' between these two buildings. The design principle underpinning the Proposed Development is for it to be seen an Extension to the Operational Scheme in Landscape Visual Impact terms. The existing 'as built' substation is shown in the image, and where the Proposed Development substation is located.	Not offered for reasons set out.	The location of the new sub-station directly adjacent to the existing substation would be acceptable to us.	

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<p>Can you provide any further evidence (site photographs?) to support the proposal that these water features are man-made drains rather than natural water features that the layout needs to avoid?</p> <p>Note recent submission indicates peat gullies or manmade drainage will be diverted or restored (which is acceptable).</p>	<p>Below: Linear man made ditches that will be diverted around hardstanding</p>  <p>Below: more natural watercourse to the south that will remain intact due to relocation of T4 to the north</p> 	<p>Turbine T4 has been relocated 32m north. This avoids the natural water feature to the south and allows the man-made drain to be diverted pre-construction. The turning head has also been moved to the east of the track to avoid the small pool.</p>	<p>Offered &amp; achievable</p> 	<p>Supportive of proposed change</p>	
<p>A change in orientation of the supporting infrastructure could move it onto the shallower eroded peat, avoiding areas with intact vegetation cover and deeper peat.</p>		<p>Repositioning the crane pad to the west would require a new internal access track to be designed (see image, red curved line/existing track also shown). This is the only acceptable option in civil engineering terms to follow the steep gradients present to ensure the track is not too steep (&gt;10%), once you have repositioned the crane pad to connect to the existing access track. There are restrictions in the south of the red-line/legal boundary which limit alternative internal access track options. The presence of deep peat in the west and south, once the crane pad has been repositioned, does not</p>	<p>Not offered for reasons set out.</p> 	<p>Thank you for investigating and explaining. Current layout in this area seems to be the better option.</p>	



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		allow for the design of turning heads (not permitted in HSE terms). Repositioning the crane pad to the west would increase the length of access tracks required by >400m. A change in crane pad orientation would not achieve the desired outcome, it would increase the environmental impacts (increase in peat depth) and be unacceptable in civil engineering & HSE terms.			
Existing track directly to Turbine but new track proposed.		The Applicant did look at three possible options in achieving this in earlier site iteration of the internal access tracks. All options would dissect a GWDTE. What became the preferred option (in environmental/civil terms, inserted and see document ' <b>TNC – T4 &amp; T6 Plan' attached</b> ) the turning head is located on a 10% vertical gradient (not permitted in HSE). The cut required for the track and hardstanding (@4m deep at the worst point) will have a knock-on effect on the existing tracks. The cut for this would create a ponding area which would need to be drained. Where the cut is located is where the existing 33kV underground cable connecting the Operational TNC Wind Farm is located (see <b>Figure 2.0 – Design Freeze 9</b> of the EIA Report). Designing &	Not offered for reasons set out.	Thank you for investigating and explaining. If new track is to be included suggest final submission includes offer to rationalise new and existing tracks so that the overall length of tracks on the site is limited. Would be helpful if this included plan showing what existing tracks will be restored.	

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		constructing an internal access track over a live underground 33kV cable is challenging but acceptable with appropriate mitigation (which the track North of Turbine T5 has incorporated). 4m of cut in this location, where the underground 33kV cable can be buried @1m deep (min. permitted is 600mm), presents an unacceptable commercial risk (the Operational TNC Wind Farm would need to be switched off, whilst any install/construction takes place for an undefined amount of time). The proposed new track does not achieve the outcome desired, and was discounted during the Design Iteration process for the Proposed Development.			
Access track from T5 to T7 is over deep peat. An alternative access from T4 to T7 would be shorter – more probing information required to consider this alternative further.		<p>Proposed track directly connecting Turbines T4 to T7 is not possible in civil engineering/turbine delivery (as the gradient exceed 20%). The alternative option (see red line image inserted) is 750m in length compared to 800m in length for the current proposed track between T5 and T7.</p> <p>The alternative would be also be over deep peat (1.5-2m) and therefore similar to the existing T5 to T7 route would need floating road sections. In addition, the steepest gradient on this option is @12% which for some turbine suppliers is too</p>	<p>Not offered for reasons set out.</p> 	Thank you for investigating and explaining. Current layout in this area seems to be the better option.	

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		<p>steep for turbine component delivery and an unacceptable commercial and health &amp; safety risk.</p> <p>This alternative track would also result in three watercourse crossings rather than a single crossing in the current T5 to T7 route.</p> <p>This alternative route would also be located on areas of Medium (orange) risk of peat landslide which is not recommended.</p> <p>The alternative internal access track does not achieve the outcome desired. On balance it would increase the number of watercourse crossing required and peat landslide risk.</p>	