



Renantis UK Limited

The Repowered and Extended Ben Aketil Wind Farm

Pre-Application Consultation Report

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RSK GENERAL NOTES

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1 INTRODUCTION

- 1.1.1 This Pre-Application Consultation (PAC) Report summarises the pre-application public consultation activity undertaken by Renantis UK Limited, formerly Falck Renewables Wind Limited, (hereafter ‘the Applicant’).
- 1.1.2 The Applicant is proposing to submit an application for consent under Section 36 of the Electricity Act 1989 for the Repowered and Extended Ben Aketil Wind Farm (the ‘Proposed Development’) on the Isle of Skye, Scotland.
- 1.1.3 Ben Aketil Wind Farm is an existing 27.6 MW wind farm which comprises 12 2.3 MW turbines with a hub height of 64 m and blade diameter of 71 m (i.e. 99.5 m to tip). Ten of the turbines were constructed in 2007, and another two were constructed in 2010. The first and second phase were given 26 and 23 years respectively from the first export of electricity to the grid which gives end dates of 18/10/33 and 01/11/33. In March 2021, a life extension was granted, extending the life of the operational wind farm to 2040.
- 1.1.4 The Applicant wishes to repower the existing wind farm and add an extension. The proposed Repowered and Extended Ben Aketil Wind Farm would have 9 turbines of up to 200 m to tip. Each turbine is likely to generate approximately 5.6 to 6.6 megawatts (MW) of electricity. The total installed capacity of the proposed turbines will be between 50.4 and 59.4 MW. A 20 MW battery energy storage system (BESS) will also be included as part of the Proposed Development.
- 1.1.5 The Proposed Development infrastructure would include:
- decommissioning and removal of the twelve existing turbines and related infrastructure including hardstandings and the existing operational control building;
 - hardstanding areas at the base of each turbine, each 3,820 m², with a maximum total area of 34,380 m².
 - approximately 9 km of new track, of which 1.5 km will consist of floating track;
 - approximately 2.3 km of upgraded track;
 - two substations and associated compounds including parking and welfare facilities;
 - an energy storage facility;
 - up to six construction compounds;
 - two potential borrow pits, to provide suitable rock for access tracks, turbine bases and hard standings; and
 - underground cabling linking the turbines with the substations.
- 1.1.6 A full description of the Proposed Development is presented in **Chapter 2** of Volume 1 the submitted Environmental Impact Assessment Report (EIAR).
- 1.1.7 The PAC Report is part of a suite of documents submitted as part of the application for consent. The report supplements the EIAR, including a summary of the actions undertaken by the Applicant to consult with local communities, as well as responses to this consultation.

2 CONSULTATION CONTEXT

2.1 Legislative context

- 2.1.1 As this development proposal is for a wind farm over 50 MW, an application is being made under Section 36 of the Electricity Act¹ directly to the Scottish Ministers there is no obligation to consult the public under the terms of the Electricity Act application process. While not a statutory requirement, the carrying out of pre-application consultation with the public is considered good practice.
- 2.1.2 The Applicant is committed to undertaking meaningful consultation with regulators, landowners, local authorities, community councils and members of the public and has adopted the consultation measures outlined for 'major' planning applications as set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 ('DMPR')². This provides the local community and all those with an interest in the proposals a clear opportunity to provide comment and feedback on the proposals.
- 2.1.3 The Applicant's approach to public consultation is described in the next section titled "Consultation Approach".

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 ('DMPR')

- 2.1.4 Article 7 of DMPR states that Applicants are to:
- *Hold at least one public event where members of the public may make comments to the prospective Applicant as regards the proposed development; and*
 - *Publish in a local newspaper circulating in the locality in which the proposed development is situated a notice at least 7 days in advance containing certain prescribed information:*
 - *a description of the proposed development and its location;*
 - *details as to where further information may be obtained concerning the proposed development;*
 - *the date and place of the public event;*
 - *a statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so; and*
 - *a statement that comments made to the prospective applicant are not representations to the planning authority and that there will be an*

¹ UK Government (1989), The Electricity Act 1989. Available at: <https://www.legislation.gov.uk/ukpga/1989/29/contents> (accessed January 2023).

² Scottish Government (2013), The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. Available at: <https://www.legislation.gov.uk/ssi/2013/155/contents/made/for> (accessed January 2023).

opportunity to make representations on any resultant application to the planning authority.

- 2.1.5 Furthermore, Article 9 states that applications for planning permission must be accompanied by a pre-application consultation report.

Temporary Amendments to the Regulations due to the Emergency Coronavirus Pandemic

- 2.1.6 The introduction of the Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020, published in April 2020, allowed for the suspension of in-person meetings in the interest of public health. The emergency period, during which the temporary regulations were in effect, ran until 30th September 2022; however, given the relaxation of COVID-19 rules and guidelines at the time of public consultation for the Proposed Development and with the intention of optimising public consultation, the decision was made with stakeholders to host in-person public events. In order to provide an alternative means for stakeholders to engage with the public consultation the event materials were made available online.

2.2 Best practice

Planning Advice Note (PAN) 3/2010 Community Engagement

- 2.2.1 The Applicant has applied the principles recommended in Planning Advice Note (PAN) 3/2010 Community Engagement³. The PAN advises that in order for the community engagement to be successful, it is important that everyone interested in the future development of the community, village, town or city they live in, should understand the planning process. It is important for developers to involve residents at the earliest opportunity so that they can feel confident that engagement in the process has been meaningful:

“Effective engagement with the public can lead to better plans, better decisions and more satisfactory outcomes and can help to avoid delays in the planning process. It also improves confidence in the fairness of the planning system. The Scottish Government expects engagement with the public to be meaningful and to occur from the earliest stages in the planning process to enable community views to be reflected in development plans and development proposals.” (page 3, paragraph 2)

- 2.2.2 PAN 3/2010 highlights the:

“Dynamic process of dialogue between individuals or groups based on a genuine exchange of and, normally, with the objective of influencing decisions, policies or programmes of action... that affect their lives... and reaching a decision in an open and transparent way (page 3, paragraph 1).”

- 2.2.3 The Applicant is dedicated to undertaking effective and early consultation methods in this way, including tailoring its strategies to suit individual communities. Residents’ values and issues of importance vary and the consultation programmes on each individual development proposal is designed to reflect that.

³ Scottish Government (2010), Planning Advice Note 3/2010: Community Engagement.

Planning Circular 3/2022: Development Management Procedures

- 2.2.4 Planning Circular ‘3/2022 - Development Management Procedures’⁴ describes the requirements for the processing of planning applications, contained in the DMPR, to help planning authorities, Applicants, communities and others to understand how the legislation works.
- 2.2.5 In relation to pre-application consultation, the planning circular recommends applicants consider the following (Paragraph 2.14):
- *‘the timing of their PAC with regard to pre-application discussions with the planning authority and statutory consultees.*
 - *approaching communities to help frame their PAC, including on when and how best to approach particular parties, such as community councils, for comment;*
 - *the timing of:*
 - *events and other engagement activity;*
 - *information provided in support of such activities; and*
 - *the timing of deadlines for comments, to allow effective engagement with communities.*
 - *additional measures for publicising PAC activities, such as use of their own web sites to host information; and*
 - *the use of online measures, in addition to the statutory minimum requirement for physical events, which may help to broaden participation and engagement.’*
- 2.2.6 Furthermore, the planning circular also states that *‘Information issued as part of PAC should be factually accurate, easy to understand, jargon free, accessible and relevant. It should be made available in appropriate formats and provided in good time to enable people to take part and discuss their views with others. In doing so, prospective applicants should consider the needs of different groups in the local population, such as people with disabilities, age or language related issues.’* (Paragraph 2.17).
- 2.2.7 The planning circular also suggests that *‘the use of online tools as an additional measure can help broaden participation and enable engagement with a wider range of people who could be affected by the proposal’* (Paragraph 2.18).
- 2.2.8 Regarding Public Events, it is stated that:
- *‘The prospective applicant is required to hold at least two events for members of the public where they can make comments to the prospective applicant on the proposals (Paragraph 2.37);*
 - *The public events should, as far as possible, be accessible to all members of the public. Consideration should be given to any additional needs of specific members of the public, such as people with disabilities. Such considerations include:*
 - *accessibility of the location and the building itself;*
 - *access to appropriate facilities, such as toilets; and*
 - *the nature of supporting materials, presentations and engagement at the event. (Paragraph 2.39)*

⁴ Scottish Government (2022), Planning Circular 3/2022: Development Management Procedures.

- *staffing of events should include people who are knowledgeable about the proposals and about the planning issues likely to be of concern or interest to the public. (Paragraph 2.41)*

Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989 (2022)

2.2.9 Pre-application consultation guidance for Section 36 Applications was set out in 'Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989'⁵, which was published in July 2022. The guidance outlines expectations of the content of pre-application consultation and engagement. **Table 1** identifies how the guidance has been applied within this PAC Report.

Table 1: Content of public event and pre-application consultation report

Requirement	PAC Report Chapter/Section
• <i>the dates on which and places where public events were held;</i>	Section 3.2
• <i>a description of any additional steps taken by the applicant to consult with members of the public regarding the development;</i>	Section 3.2 and 3.4
• <i>a list of bodies, groups and organisations who were consulted by the applicant and a description of how they were consulted;</i>	Chapter 3
• <i>a description of any materials sent to consultees and materials provided to those attending public events;</i>	Section 3.2 and 3.3
• <i>copies of any visual presentation shown or displayed at a public event, and photographs of any display boards or models at public events;</i>	Appendices A-F
• <i>confirmation as to whether consultees and attendees at public events were informed that pre-application consultation does not remove the right or the potential need to comment on the final application once it is made to the Scottish Ministers;</i>	Appendix b
• <i>a summary of the written responses to consultations</i>	Table 2

⁵ Energy Consents Unit (2022), Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989, Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/> (accessed January 2023).

Requirement	PAC Report Chapter/ Section
<i>and views raised at public events, including an indication of the number of written responses received and the number of persons who attended the public events;</i>	
<ul style="list-style-type: none"> <i>an explanation of how the applicant took account of views raised during the pre-application consultation process; and</i> 	Table 2
<ul style="list-style-type: none"> <i>an explanation of how members of the public were given feedback on the applicant's consideration of the views raised during the pre-application consultation process."</i> 	Chapter 3

2.3 Community benefit

- 2.3.1 The Applicant operates the existing Ben Aketil Wind Farm which is currently operating on the Site of the Proposed Development. The Dunvegan Community Trust has received community benefit funding from the Ben Aketil Wind Farm over the lifetime of the existing wind farm. Several members of the community are also members of the cooperative which owns a stake in the existing wind farm.
- 2.3.2 The existing community benefit arrangement between the Applicant and the local community has paid out £752,211.50 to date. This includes funding from both the existing turbines, operational in 2007, and the extension, operational in 2010. These funds have been used to support numerous local initiatives, including:
- an ambulance response vehicle;
 - a new floor in Dunvegan Community Hall sports hall;
 - a new heating system in Dunvegan Community Hall;
 - a community mini bus;
 - improvements to the war memorial;
 - Cullen FM radio transmitter repairs;
 - chrome books for Dunvegan Primary School; and
 - installation of a moorings pontoon, bridge, plinth and access path at Loch Dunvegan.
- 2.3.3 The Applicant wishes to ensure that the local community benefits directly from the use of their local resources and are compensated for the expected disruption and inconvenience associated with large scale development work.
- 2.3.4 The Applicant is committed to continuing to provide voluntary community benefits. This would continue the legacy of sustainable projects that have already been supported by the existing Ben Aketil community fund.

- 2.3.5 The Applicant will also be offering local members of the public the opportunity to participate in a new cooperative, which would be set up to own a stake in the Proposed Development, should planning permission be granted.
- 2.3.6 Local communities would continue benefitting from the Proposed Development. (index linked). Over the proposed 35-year lifetime of the project, up to £10.4 million of community benefit funding will be provided for projects that meet local needs and aspirations.
- 2.3.7 Whilst there is no specific guidance in respect of the consultation process for agreeing the means and modes of delivering community benefit, the Scottish Government guidance provides a clear steer towards establishing approaches that necessitate a close degree of engagement with relevant community bodies in developing proposals in order to deliver a lasting legacy. Therefore, the Applicant would deliver community benefit through the means and modes of the existing arrangement, i.e., through funding applications to a community trust.
- 2.3.8 The Applicant is also committed to maximising employment opportunities for those local projects by making sure that local people and business have the opportunities to directly benefit from the proposal. As a major infrastructure development, the Proposed Development has the potential to create employment opportunities. If consented, jobs would be created both during construction and after completion and in support of operation and maintenance activities. Further details on the socio-economic benefits of the Proposed Development are further discussed in **Chapter 13: Socio-Economics, Land Use, Recreation and Tourism** of the Environmental Impact Assessment Report.
- 2.3.9 New development can bring increased opportunities for local companies to gain new business. As much as possible, the Applicant would work with local people and suppliers that are able to provide a variety of skills and services during the construction phase and during the operational life of the Wind Farm. This may include opportunities for the following:
- an engineering, procurement and construction contractor;
 - construction material suppliers: concrete, aggregate and building materials;
 - electrical contractors: supply and installation of plant, cabling, earthing, etc;
 - plant and equipment hire contractors: excavation earthworks, craneage, welfare units, etc;
 - labour hire companies: engineers, plant operatives and general labourers;
 - transport: taxis and minibuses for local labourers; and
 - waste recycling and management: waste carriers and recycling specialists.

3 CONSULTATION APPROACH

3.1 Introduction

- 3.1.1 Public consultation is an essential requirement for large-scale infrastructure projects and the Applicant is committed to putting community consultation at the heart of all their activities for the Site.
- 3.1.2 The aims of the consultation and engagement process were:
- to be inclusive and accessible;
 - to raise awareness of the Proposed Development;
 - to clearly communicate feedback from the local community to the project team; and
 - to address lawful planning concerns raised by consultees.
- 3.1.3 The Applicant has undertaken a multifaceted public consultation approach, including maintaining a project website, project email address, project mailbox, project telephone line and providing an online feedback form. This was supplemented by two in-person public events.
- 3.1.4 Public consultation was held at key stages in the development process to inform the public and other interested parties of different options for the construction of the project and the emerging findings of the EIA, and to elicit comment and feedback on the Proposed Development.

3.2 Public consultation



Photograph 1: the second round of in-person public exhibitions



Photograph 2: the second round of in-person public exhibitions

In-person public exhibitions at Dunvegan Community Hall

- 3.2.1 The Applicant hosted two rounds of in-person public exhibitions at Dunvegan Community Hall, giving the opportunity for stakeholders to meet with the Applicant, to ask questions and express their views and suggestions in-person.
- 3.2.2 The first round of exhibitions took place on 7th and 8th September 2022, after the submission of the Scoping Report to the ECU. The exhibition consulted the public on the design of the Proposed Development presented at Scoping stage.
- 3.2.3 The second round of exhibitions were held on 25th and 26th January 2023 and were hosted to inform the public about changes made to the layout after the design freeze, in response to scoping consultation and feedback from the previous exhibition event. These are illustrated in **Photographs 1 and 2** above.
- 3.2.4 The public exhibition events were publicised in various ways, as illustrated in **Appendix A**, including:
 - adverts in the West Highland Free Press, appearing in consecutive publications for two weeks prior to the events;
 - a poster displayed on the Dunvegan community notice board and in local community amenities (shops, etc);
 - a postcard invitation sent to all households and businesses within the five community council areas which fall within the Zone of Theoretical Visibility (ZTV) of the Proposed Development (in excess of 2,000 properties); and
 - an email invitation and information about the project was sent to local MSPs, MP, Councillors and Community Councils to invite them to the public exhibitions. The Applicant sent the invitations on 24th August for the first round of exhibitions, and then on 16th January for the second round of exhibitions.
- 3.2.5 The consultation included a number of information boards that outlined the project location, description of the proposals, viewshed maps, several key viewpoints, the studies being undertaken, community ownership, the development timeline, and the EIA and planning process, as well as the potential benefits of the Proposed Development.

The exhibition information boards presented at the first exhibition are shown in **Appendix B**. **Appendix C** contains the boards used in the second round of public exhibitions.

- 3.2.6 In addition to the information boards, the following were provided at both event rounds:
- face to face consultation and discussion between attendees and the exhibition team;
 - an indicative wireline drawing to show a comparative view, from the north, of the height of the existing turbines and the new proposed turbines;
 - feedback forms and pens, as well as a QR code to allow online feedback (**Appendix D**).
- 3.2.7 At the second round of exhibition events, to illustrate the changes made to the design in response to scoping responses and public feedback at the previous exhibitions, the following additional materials were provided:
- A2 print outs of photomontages and wirelines from several key locations;
 - an A2 Zone of Theoretical Visibility map; and
 - live location-specific wireline visualisations at the request of attendees to observe how the Proposed Development would appear from any specific point around the area, using appropriate software.
- 3.2.8 The consultation material was also made available online via the project webpage⁶. Feedback forms could also be submitted on the project website⁷, or via email or post, and the Applicant also provided telephone contact details.

Additional engagement

Project website

- 3.2.9 The dedicated project website (**Appendix E**) and email address went live for the first time on 6th September 2022. As well as project information, the website provided the opportunity for stakeholders to submit comments and questions, as well as displaying all application and consultation documents for public view.
- 3.2.10 *Direct consultation*
- 3.2.11 The Applicant engaged directly with some members of the public who attended the first round of public exhibitions and raised concerns both in conversation and via feedback forms. The Applicant provided the additional information they had requested and discussed their concerns further via telephone conversations followed up by email.
- 3.2.12 In one case, a member of the public was unable to attend the exhibition or to access the internet and requested via telephone that the information presented at the exhibition be provided to them. A printout of the exhibition boards and other materials that were made available at the first public exhibition were posted to them.

⁶Project Website: <https://benaketilwindfarm.co.uk/>

⁷ Online Feedback Form: <https://survey123.arcgis.com/share/dd29a8a9368142fcbca5009afacda11c>

3.3 Consultation responses

- 3.3.1 A total of 43 people attended the first round of public consultation events and 32 people attended the second round. Residents had several questions/comments and provided a mixture of positive, neutral and negative feedback on the Proposed Development.
- 3.3.2 13 feedback forms were received during and following the first round of exhibition events and a further 12 forms were received just before, during and following the second round of events. Feedback was also provided via the project email address, the online feedback form and through the post.
- 3.3.3 Overall, just over half of the feedback forms received were positive (14/25 forms) about the Proposed Development, with the remaining being negative (6/25) or indifferent (5/25). A summary of feedback responses received is provided in **Table 2**, along with corresponding responses from the Applicant. Feedback focused on the following themes, in no particular order of importance:
- community benefits and compensation;
 - construction programme;
 - continuous energy generation;
 - cumulative landscape and visual impacts;
 - decommissioning – specifically waste and recycling concerns;
 - design principles and rationale;
 - ecology and ornithology impacts;
 - landscape and visual impacts;
 - noise;
 - public consultation process;
 - recreation; and
 - traffic and transport.

Table 2: Summary of public consultation feedback and the impact of feedback on the proposal

Feedback Topic	Description	Response from the Applicant
Community benefits & compensation	Concerns regarded the current community benefit arrangement, suggesting it be extended to benefit the wider community and fund larger legacy schemes in partnership with other communities. Some feedback also expressed a desire for initiatives such as local ownership or a community electricity discount scheme.	The Dunvegan Trust receives community benefit funding directly from Renantis which will continue, should the Proposed Development be granted consent. The current Isle of Skye Wind Power Co-op, which was set up and run by Energy4All, allowed local investors to invest up to £20k each per investor. If the Proposed Development is approved a new co-operative will be set up, again offering local people the opportunity to invest. Furthermore, the Applicant is in discussions with the Dunvegan Trust about the possibility of a shared ownership scheme and funding future projects that benefit the wider community. They also plan to engage with Edinbane and Struan communities on the concerns raised and to encourage the local community groups to work together on larger legacy projects.
Construction phase disruption	Some individuals were concerned about potential disruption during the construction phase of the Proposed Development, particularly in relation to drinking water and emergency service access.	Chapter 18: Schedule of Mitigation in Volume 1 of the EIAR will set out the mitigation measures proposed by the Applicant to minimise potential disruption during construction. This will detail the actions that would be taken to ensure continued emergency service access and minimising impacts on drinking water. The potential impacts of the construction phase on groundwater has been assessed in Chapter 9: Hydrology, Geology, Hydrogeology and Peat , and in Technical Appendices 9.3 and 9.4 . Potential impacts on traffic and on transport routes have also been discussed Chapter 11: Traffic and Transport .
Construction programme	Queries regarding the timeline of construction and if this coincides with other major developments locally, particularly other wind developments which are being proposed within a similar geographical area.	Should planning consent be granted for the Proposed Development, construction would likely commence in 2025. A cumulative impact assessment has been undertaken for each of the environmental technical disciplines being considered during the EIA for The Repowered and Extended Ben Aketil Wind Farm. The developments that have been included in the cumulative assessments have been listed in each chapter.
Consultation process	Some members of the public believed the consultation event only offered to inform the local community of the proposals, rather than listening to community opinions.	The initial consultation event was held to inform the public of the preliminary plans for the Proposed Development, with environmental surveys and an environmental impact assessment still to be undertaken. The purpose of the first public exhibition, held in

Feedback Topic	Description	Response from the Applicant
		<p>September 2022, was to introduce the project to the public, ascertain if they had any issues or concerns, answer their questions and start a conversation with local people as to how they would like to benefit from the Proposed Development.</p> <p>Following the first public event, the feedback received was taken into consideration during the iterative design of the wind farm. The Applicant also engaged directly with several attendees who had raised concerns to answer their questions and discuss their concerns in more detail.</p> <p>A second public consultation event was held in January 2023. The purpose of this event was to present the frozen design of the Proposed Development and describe the work that was ongoing to assess the potential impacts of the Proposed Development on the receiving environment.</p> <p>The Applicant has been in discussion with the Dunvegan Community Trust regarding continued future community benefit arrangements and has listened to suggestions put forward by members of the community at both public exhibitions. Details of the voluntary community benefit arrangements are yet to be determined, but the Applicant is committed to ensuring that the local community continues to benefit from the development.</p>
Decommissioning	<p>Some members of the public were concerned that the decommissioning of the existing Ben Aketil turbines would be at a considerable environmental cost in terms of CO₂.</p> <p>Feedback questioned why refurbishment was not an option over disposal.</p> <p>A question was raised as to how the existing turbine foundations would be dealt with during decommissioning – will they remain <i>in situ</i>, or will they be removed from site?</p>	<p>Turbines to be removed would be recycled as far as possible. Blade repurposing is currently being researched within the industry and would be considered as a possible option to recycle / reuse. This is discussed in Chapter 2, Volume 1 of the EIAR. Furthermore, Chapter 15: Climate Change Mitigation calculates the carbon footprint of the Proposed Development.</p> <p>Regarding the choice to dispose of the existing turbines rather than refurbish them, the turbines on the Site have already been operating for between 12 and 15 years. Although they are regularly maintained, the turbines have a design life of 25 years and, as the turbines get older, maintenance costs gradually increase and efficiency decreases. Refurbishing of the existing turbines already takes place, as they are being regularly maintained. However, it is not possible to replace the</p>

Feedback Topic	Description	Response from the Applicant
		<p>turbines like-for-like with identical 100 m tall turbines, as such turbines are no longer commercially available. Any new turbines built on the Site as part of these proposals would be operating from 2027 onwards, 20 years after the first turbines were operational on the Site.</p> <p>The finalised design intentionally maximises the existing infrastructure on-site, such as access tracks, and it is the Applicant's wish to reuse materials from the existing wind farm for the construction of the Proposed Development, e.g. hardstanding material from the existing wind turbines will be reused to create hardstandings for the Repowering turbines. Metal components would be removed from site and recycled. Non-recyclable components would be repurposed as far as possible, with the aim of minimising the volumes required to be disposed to landfill.</p> <p>The details of how the existing wind farm will be decommissioned have not yet been determined; however, the Applicant is committed to carrying out decommissioning in line with government guidelines and, where possible, industry best practice, with the aim of maximising sustainability and minimising carbon emissions. The decommissioning of the existing turbines would also be carried out in compliance with the applicable planning condition(s) of the planning consent for the existing Ben Aketil Wind Farm.</p>
Design principles and rationale	Design concerns generally regarded the new access roads (considered unnecessary when one already exists at Ben Aketil existing wind farm access), as well as the increased turbine size.	<p>The design rationale behind including the southern access track is to allow the extension turbines to be constructed prior to the decommissioning of the existing turbines, to ensure that energy generation can continue through the construction period. Furthermore, the provision of two access tracks could potentially result in reduced traffic congestion. Refer to Chapter 11: Traffic and Transport of the EIAR.</p> <p>The route of the southern access track has changed since the first round of exhibitions. The southern track now makes use of the existing access track in the south of the Site, and links up with the existing crofter's track within the Site. The track would be upgraded to enable wind farm access. The upgrading of the track could also provide a potential opportunity to repair or enhance parts of the current track and watercourse crossing(s).</p>

Feedback Topic	Description	Response from the Applicant
		Different turbine heights were considered during the design process. Comparative analysis of the turbines from various viewpoints in appropriate software illustrated negligible visual difference between 180 and 200 m to tip turbines on this Site, in the proposed arrangement. Therefore, the Proposed Development would allow for a far greater production of renewable energy for negligible visual difference.
Ecology and Ornithology	Concern of about the displacement of wildlife and habitats due to local forest felling, as well as more generalised enquiries about the potential effects on ecology and ornithology. Some members of the public queried the effect on the Red Burn.	<p>Forest felling has not been conducted by the Applicant and will not be required during construction, with the exception of a small area of forestry within the footprint of the proposed Borrow Pit 2. Effects on ecology and ornithology has been evaluated in Chapter 7: Ecology and Chapter 8: Ornithology in Volume 1 of the EIAR and mitigation of other impacts which may cause disruption or nuisance impacts will be included in Chapter 18: Schedule of Mitigation in Volume 1 of the EIAR.</p> <p>The potential impacts on the Red Burn have also been assessed in Chapter 7: Ecology and Chapter 9: Hydrology, Geology, Hydrogeology and Peat in Volume 1 of the EIAR.</p>
Energy generation	Concerns were raised regarding guaranteed continuous output during the project.	The Applicant is considering two construction phasing options. Scenario 1 would keep the current wind farm operational while the Extension turbines (T6 to T9) are constructed, and once those are operational, the existing turbines would be decommissioned, and the repowering turbines (T1 to T5) would be constructed. In this way, it would be possible to continue generating energy during construction. See also Chapter 2: Proposed Development .
Landscape and visual impacts	Landscape and visual concerns were raised over the extent of the proposals, the area covered, the height of the proposed turbines and the prominent visibility from some areas.	Landscape and Visual impacts have been assessed in Chapter 6: Landscape and Visual Impact Assessment (LVIA) , in Volume 1 of the EIAR. Furthermore, LVIA viewpoints (Volume 2 of the EIAR) were agreed with THC and NatureScot.
Cumulative Impacts	People expressed worries of having too many turbines in the same area.	Figure 6.2 in Volume 2 of the EIAR illustrates the cumulative sites considered by EIA. Currently, there are Ben Aketil and Edinbane wind farms operational within 45 km of Ben Aketil. In addition to that Ben Sca and Glen Ullinish have been consented and likely to be constructed and operational in coming years.

Feedback Topic	Description	Response from the Applicant
		Several photomontages were presented on A2 printouts from different viewpoints during the second public exhibition, and people were offered the opportunity to look at wirelines of the turbines from a viewpoint of their choosing using suitable software. No complaints or negative feedback was received from people who viewed these during the public exhibition. During the first public exhibition, one person had requested the use of a computer to show how the turbines would look from various viewpoints, and commented during the second public exhibition that they were pleased this feedback had been listened to.
Noise	Members of the public wanted to know the impact on background noise levels.	The noise limits against which the Proposed Development have been assessed in Chapter 12: Noise in Volume 1 of the EIAR were agreed with THC's Environmental Health Officer.
Recreation	Concern about the impact on the walking trail from Edinbane through the forest and down to the operational Ben Aketil Wind Farm.	The potential impacts of the walking trail have been assessed with the recreational impacts of the Proposed Development in Chapter 13: Socio-economics, Land-Use, Recreation and Tourism in Volume 1 of the EIAR.
Traffic and Transport	Members of the public wanted to be consulted further on potential impacts and access proposals. Some members of the public raised concerns about the increase in traffic during the construction phase, and the potential for tourist traffic to be impacted by the construction traffic, particularly AILs.	Impacts on traffic and transportation have been assessed in Chapter 11 , Volume 1 of the EIAR. Potential impacts on recreation and tourism are addressed in Chapter 13: Socio-Economics, Land Use, Tourism and Recreation . In Chapter 11: Traffic and Transport , it is stated there would be a community liaison forum post-consent, through which to communicate and engage with local people regarding access arrangements.

- 3.3.4 Following the public consultation events, the Applicant provided a summary of project-specific feedback to the relevant technical teams to help inform their work on the project. In addition, the Applicant continued to engage with elected representatives, the local community trust and local residents throughout the EIA process to keep them updated and made all information available on the website.

3.4 Conclusion

- 3.4.1 Throughout the consultation process the Applicant has demonstrated, through the summary in **Table 2** above, a responsiveness to consultation and feedback received.
- 3.4.2 Additionally, the public consultation events themselves were hosted at key times of day to ensure that the maximum number of local stakeholders would be able to attend, and each event was held over two days to allow time for word-of-mouth to reach people who may have been unaware of the first day of the public consultation event.
- 3.4.3 The Applicant would like to take this opportunity to thank all stakeholders and members of the public who took part in the consultation process, and helped to shape the Proposed Development

Next steps

- 3.4.4 The Applicant will continue to respond to all questions and queries that are received in regard to the Proposed Development in a timely manner and look to continue to build on the constructive dialogue with all stakeholders, especially in regard to community benefit.
- 3.4.5 Stakeholders will be informed of the submission of the application by newspaper advertisement, and will have the opportunity to read the EIAR and supplementary documents online, or in person at various local locations. Stakeholders will also be provided with information on how representations to the formal application can be made to the Scottish Government.

3.5 References

Energy Consents Unit (2022), Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989. Available at: <https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/>, (accessed January 2023).

The Highland Council (2023), Major Developments, Public Engagement and Planning. Available at: https://www.highland.gov.uk/info/180/planning_-_applications_warrants_and_certificates/579/major_developments/5, (accessed January 2023).

Scottish Government (2013), The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, Available at: <https://www.legislation.gov.uk/ssi/2013/155/contents/made/for>, (accessed January 2023).

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