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### **3. Design Changes to the Proposed Development to Address Consultee Responses**

#### **3.1 Introduction**

3.1.1 Chapter 3 of the 2016 EIA Report provides a detailed description of the Proposed Development which includes a description of the Development Site and its environmental and geographical context (Section 3.1 of the 2016 EIA Report). It also includes a description of the construction methodology (Section 3.2 of the 2016 EIA Report) and the infrastructure which would comprise the Proposed Development (Section 3.4 of the 2016 EIA Report).

3.1.2 A description of the proposed changes to the Proposed Development is provided below.

#### **3.2 Removal of Three Turbines**

3.2.1 The Highland Council's (THC) Planning Officer submitted a Report of Handling on the Proposed Development to the North Planning Applications Committee (NPAC) in January 2017. The Officer recommended that no objection be raised to the Proposed Development, subject to the mitigation outlined at paragraph 9.9 of the Report (and to planning conditions). The mitigation set out in paragraph 9.9 sought the following changes to the scheme:

- The reduction in height, relocation or removal of Turbines 20 and 21; and
- The relocation or removal of Turbine 19.

3.2.2 In advance of the NPAC Meeting being held on 10 January 2017, Members of the NPAC agreed to defer consideration of the scheme in order to consider information presented by Scottish Natural Heritage in relation to a tentatively listed World Heritage Site. Following consideration of this matter, THC's Planning Officer submitted an updated Report of Handling on the Proposed Development to the NPAC in February 2017. This Report of Handling maintained the Planning Officer's earlier position in respect of the recommendation that no objection be raised to the Proposed Development subject to mitigation as set out above and to planning conditions.

3.2.3 Prior to the NPAC's resolution to object to the Proposed Development on 21 February 2017, the Applicant undertook an evaluation of the potential impact of the recommended changes, both in technical and commercial terms, and in relation to the associated environmental implications. Following this evaluation, the Applicant gave an undertaking to THC on 6 January 2017 that it would amend the application to remove Turbines 19, 20 and 21, if NPAC resolved not to object to the Proposed Development in its revised form. In the event of such a resolution, the Applicant would then have submitted supplementary information in relation to the amendment. However, the NPAC resolved to

object to the Proposed Development and this was reflected in THC's formal position letter of 28 February 2017.

- 3.2.4 The options of turbine relocation and height reduction in relation to Turbines 19, 20 and 21 were assessed. Reducing the tip heights of these three turbines, which were proposed at 126m height, would significantly reduce the wind resource available, which in a subsidy-free operating environment render them uneconomic to operate. The option to relocate the turbines within such a site limited by environmental and technical constraints was found to be unacceptable.
- 3.2.5 The Applicant then evaluated the likely environmental effects that could result from the removal of the three turbines and found that such amendment could, not unexpectedly, give rise to some visual benefits and to a reduction in the construction footprint.
- 3.2.6 Specifically, the removal of Turbines 19, 20 and 21 would result in a reduction in the magnitude of visual impact in respect of those viewpoints in closest range and receptors to the north of the Site, including from Reay Church and Reay Footpath, as well as in terms of the visual amenity that would be experienced at various residential receptors.
- 3.2.7 At the same time the Applicant was hopeful of securing consent without the need to progress through a public inquiry process, noting the clear terms of the recommendations of the Reporters for the previous inquiry held relating to a scheme comprising 24 turbines (which did not include a recommendation to reduce the height of, relocate, or remove any turbine). While the Applicant did not believe that the removal of 3 turbines could be reasonably required to enable a consent to be issued, it nevertheless made the offer recorded above in an email to THC of 06/01/17 (SI Appendix 3.A)
- 3.2.8 The Applicant has now committed to remove the above three turbines before the inquiry in the same terms put to THC, and the assessment of the environmental effects of the amendment are set out in this Supplementary Information (SI).
- 3.2.9 The Revised Layout is shown on SI Figure 1.1 with a comparison between the Original Layout and the Revised Layout shown on SI Figure 1.2.
- 3.2.10 Turbine heights for the remaining turbines are unchanged from the Original Layout (i.e. six turbines would have a maximum tip height of 126m with the other 15 a maximum tip height of 139m). The height of each turbine is shown on SI Figure 1.1.
- 3.2.11 The changes have resulted in a reduction of the proposed access tracks from ~19,400m to ~18,800m and a reduction in the permanent infrastructure footprint from ~13.24ha to ~12.59ha. The generation capacity has been reduced by 9MW. All other proposed infrastructure is as described in the 2016 EIA Report.

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### **3.3 Technical Assessments not Considered Further in this SI**

3.3.1 The following assessments, presented within the 2016 EIA Report, are considered to be unaffected by the changes to the Proposed Development:

- Planning Policy Context;
- Geology, Hydrology and Hydrogeology;
- Terrestrial Ecology;
- Aquatic Ecology;
- Shadow Flicker; and
- Infrastructure, Telecommunications and Aviation.