

Craiginmoddie Wind Farm

Additional Information II

January 2023

CONTENTS

1	INTRODUCTION	1
	Background	1
	Request for Additional Information.....	1
	Structure of this Additional Information.....	2
	Contact for Further Information	2
2	PEAT STABILITY	4
	Introduction	4
	Issues Raised	4
	Summary of Additional Information.....	4
APPENDICES		
Appendix 1.1: Peat Landslide Risk Assessment Stage 3 Checking Report		
Appendix 1.2: CAA Approval of Reduced Lighting Scheme		
Appendix 2.1: Peat Hazard Landslide Risk Assessment		
Appendix 2.2: Peat Management Plan		

1 INTRODUCTION

Background

- 1.1 This Additional Information ("Additional Information II") is submitted in support of a Section 36 application (ECU00002196) by Energiekontor UK Ltd ("the Applicant") to the Energy Consents Unit (ECU) for fourteen wind turbines and associated infrastructure ("the Proposed Development") on land at Craiginmoddie ("the Site"). The planning application was accompanied by an Environmental Impact Assessment Report ("the EIAR") as required under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations.
- 1.2 Regulation 19 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 directs that in order to ensure the completeness and quality of an EIAR, the Scottish Ministers must seek from the developer supplementary information about any matter mentioned in Schedule 4 which in the opinion of the Scottish Ministers is directly relevant to reaching a reasoned conclusion on the significant effects of the development on the environment.
- 1.3 Regulation 20 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 requires that, where additional information is provided to the Scottish Ministers, the developer must publicise the information in accordance with various requirements.

Request for Additional Information

- 1.4 Ironside Farrar Ltd was commissioned by the ECU to produce a Stage 3 checking report (included at **Appendix 1.1**) to technically assess the Peat Landslide Hazard and Risk Assessment(s) (PLHRAs) submitted by the Applicant. The Stage 3 checking report considered responses received from the Applicant to the Stage 2 checking report recommendations to see if the issues raised had been adequately addressed.
- 1.5 The audit assessed the additional information provided by the Applicant in response to the Stage 2 checking report against the Energy Consents Unit Best Practice Guidance for Peat Landslide Risk Assessments (ECUBPG).
- 1.6 The recommendations made in the Stage 2 checking report were:
 - As per ECUBPG significant additional probing over and above the Phase 1 grid is required at infrastructure locations. Peatland Survey Guidance provides appropriate probing density backed by the clear requirements of the ECUBPG. Additional probing is required in line with guidance; and
 - Include the section of access track within Table 4.9 of the Peat Landslide Hazard Risk Assessment (PLHRA).
- 1.7 In response to the Stage 2 checking report, the Applicant provided comments and justification on probe coverage around the infrastructure areas identified for additional

probing. However, the Stage 3 checking report concluded the Applicant's response did not address the queries raised in the Stage 2 checking report, as the comments and justification on probe coverage were not in line with ECUBPG. Additional probing was therefore sought by Ironside Farrar Ltd.

- 1.8 Furthermore, Ironside Farrar Ltd sought the inclusion of the main access track within table 4.9 of the PLHRA.
- 1.9 To satisfactorily address the outstanding issues raised in the Stage 3 Checking Report, the following additional information is provided as part of this Additional Information:
- Peat Management Plan. An update to the original peat management plan is provided.
 - Peat Stability Risk Assessment. An update to the original Peat Stability Risk Assessment is provided.
- 1.10 Separately, in December 2022 the Civil Aviation Authority (CAA) confirmed that a reduced aviation lighting scheme could be utilised for the Proposed Development. This provides for the following:
- Medium intensity steady red (2000 candela) lights on the nacelles of turbines 1, 3, 5, 7, 8, 10, 12 and 13 only;
 - A second 2000 candela light on the nacelles of the above turbines to act as alternates in the event of a failure of the main light;
 - The lights on these turbines to be capable of being dimmed to 10% of peak intensity when the lowest visibility as measured at suitable points around the wind farm by visibility measuring devices exceeds 5km;
 - Infra-red lights to Ministry of Defence specification installed on the nacelles of turbines 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12 and 13; and
 - Intermediate level 32 candela lights are not required to be fitted on turbine towers.
- 1.11 The CAA approval letter is included at Appendix 1.2 of this Additional Information.

Structure of this Additional Information

- 1.12 This Additional Information is structured as follows:
- Section 2 provides supplementary information on issues regarding peat stability issues in relation to comments that have been raised by consultees.

Contact for Further Information

- 1.13 For additional copies, a charge of £15 will be made for a full electronic copy of this Additional Information on CD or memory stick. Hard copies can be made available for a £100 charge.
- 1.14 Requests for copies should be made to:

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2 PEAT STABILITY

Introduction

- 2.1 This chapter addresses the issues raised by Ironside Farrar Ltd, who were commissioned by the ECU to undertake a Stage 3 checking report to consider responses received from the Applicant in relation to the recommendations and issues raised in the Stage 2 checking report. Updated versions of the PLHRA and Peat Management Plan (PMP) which together seek to address the recommendations and issues raised in the Stage 3 checking report are provided in full at **Appendix 2.1** and **Appendix 2.2** respectively of this Additional Information. They are summarised in this section.

Issues Raised

- 2.2 Issues raised relate to:
- The extent of infrastructure probing; and
 - The inclusion of the main access track in table 4.9 of the PLHRA.

Summary of Additional Information

- 2.3 The PLHRA has been updated following the collection of additional soil probing data based on the external recommendations of Ironside Farrar in their Stage 3 checking report.
- 2.4 Additional detailed soil probe data points were collected across the proposed infrastructure layout targeting areas to increase the density of recorded data points where access on foot was possible. The finding of this additional probing correlates with the existing conclusions on peat depth and distribution across this development. At main infrastructure locations there was an overall lowering in calculated average peat depths.
- 2.5 Following a review of this additional probing information, Natural Power has not found any increase in the overall risk for the development and stands by the conclusions of the original report. The risk assessment has been reviewed and key risk mapping inputs updated to reflect the increased density of soil probes.
- 2.6 The peat depths across the site are on average <1m with a mean peat depth across the development calculated to be 0.75m. It should be noted that where peat probes indicate shallow depth 0.1m to 0.3m that the deposits are likely to be comprised of a topsoil and mineral subsoil.
- 2.7 The main entrance track has also been included in the PLHRA. Peat depth here is up to 0.8m with a deeper zone of peat potential to the south.
- 2.8 The PMP has been updated to account for amendments to the peat volume information following the collection of further peat depth data, with an additional 753 peat depth points recorded as part of this recent survey work.

- 2.9 Section 5 of the PMP shows the updated peat volume information, the outcome of which demonstrates there will be a small surplus of 421m³ of peat. Following detailed design, additional opportunities for micro siting and/or floating infrastructure will be identified to reduce the volumes of peat excavated from access tracks. Peat can also be used during the dressing and reinstatement of other features including drainage as well as part of local habitat restoration proposals.
- 2.10 Where factors which contribute to the bulking of the peat deposits are mitigated the total volume of excavated peat may be further reduced through:
- Reduction of peat handling with re-use of peat undertaken as close as possible to the excavation site;
 - Maintaining the integrity of the excavated peat mass including preservation of the surface acrotelm layer as far as possible; and
 - Preventing the drying and desiccation of excavated peat deposits through timely re-vegetation and preservation of the surface hydrology systems.