PROPOSED CLASH GOUR WIND FARM
ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT, APRIL 2017

Comments from Finderne Community Council

1 Introduction

Finderne Community Council welcomes the opportunity to provide comments on the Scoping Report prepared by SLR on behalf Force 9 Energy and EDF Energy Renewables pertaining to the proposed Clash Gour Wind Farm. The Council commends Force 9 Energy and EDF Energy Renewables on its approach of openly engaging with statutory consultees and other stakeholders including the relevant Local Community Councils at this early stage in the development proposals.

The following comments pertain specifically to **forestry**, **wildlife**, **traffic management, fisheries and water.**

2 Forestry

The proposed wind farm development is located within Moray which, with its 62,400 hectares of forests and woodlands or 33% of total land area, is one of the most heavily wooded counties in Scotland, compared with the overall national average of 18%.

Moray has a proud history of forest and woodland stewardship and its woodlands resource continue to provide a high quality and jealously guarded aspect of the county's environmental, economic and social fabric. As a key land use in Moray the woodland resource makes important contributions to the local economy through timber production, wood processing and other downstream woodland-related businesses together with delivering wide ranging access and recreation, biodiversity, tourism, health and well being and community benefits, of which there are many nationally recognised exemplars.

The net loss of productive woodland in Scotland over the past two decades (cited as approximately 24,000 hectares) is a matter of considerable strategic concern to the Scottish Government and to the forestry industry as a whole. Such losses have arisen from a number of causes, including the need to diversify second rotation forests through restructuring design, removal of forests from high quality peatlands and wholesale or partial loss of woodland to wind farm developments. Despite its heavily wooded landscape as described above, any net loss of productive woodland and associated economic and environmental impacts would be as unwelcome in Moray as anywhere else in Scotland, unless such permanent removal could incontrovertibly demonstrate net environmental benefits.

Accordingly we would expect the Scoping Report (and subsequent EIA) to provide a significantly more detailed recognition and analysis of the potential impacts of the development proposals on forestry than has been given to date, particularly given that "*the majority of the site is currently used for forestry*". Thus far in the Scoping report there is only scant reference to forestry (in Section 3.1.5) (despite the fact that this is the prime land use affected by the development) compared to other material considerations such as landscape and visual, ornithology, ecology, soils, etc., which - although undoubtedly important - are arguably materially affected or characterized by the fact that they are located within commercial forestry plantations.

We therefore consider that forestry should be addressed in its own right as a "specialist environmental topic" for inclusion in the Scoping Report. Under this topic we would want to understand how the management of the existing and subsequent forestry will be addressed in the relevant section of the ES, and how any proposals for removal of woodland to accommodate the wind farm construction, would be addressed in the policy context of the Scottish Government's' "Policy on Control of Woodland Removal" (as cited on Page 9 of the draft Scoping Report), and how the forest design plan will meet the requirements of the UK Forestry Standard and associated guidelines.

Under Section 13.3.1 entitled "Key Policy Review", we feel that key policy documents pertinent to the SIA should also include the **Moray Woodland and Forestry Strategy (2017**) - currently out for consultation - and the **UK Forestry Standard**.

3 Wildlife

We have concerns regarding the development's potential impacts on breeding bird species.

Although most study and talk is made of protected bird species as defined under the Schedules of the Wildlife & Countryside Act 1981 (W&CA), recent drops in local and national wading bird species numbers (in particular curlew, now placed on the 'Red List' by the British Trust for Ornithology) breed in moorland areas including those highlighted for the southwestern area of the development. Transit to/from feeding areas and the ability to avoid predators can be compounded by increased wind farm turbine installation across the whole area.

The latter transit aspects also affect red-throated divers (a W&CA 1981 Schedule 1 species) which have attempted breeding in the area in recent years, and are known to forage for food on Findhorn Bay before returning to their nest site/s in the development area. It is unlikely that any ornithological studies employed by the developers would be aware of this fact, being focused on the development area itself and not the wider picture.

Force 9 Energy has previously been openly pleased and 'flag waved' that the Berry Burn Wind Farm, which will effectively become the nucleus of the Clash Gour development, was constructed during the breeding season of hen harriers which nest in the area - again a Schedule 1 species. One could state that for this to have gone ahead and, despite resultant success, was reckless and the risk should not be attempted again. One nest location is supported by a large hunting/feeding area and the type of feeding switches through the course of the breeding season; for example, the breeding pair will initially feed on voles and other small mammals before catching small birds to feed to their young. This requires the birds to operate not only in and over moorland adjacent to the nest but also far and wide into farmland to the north. The development as indicated gives extreme concern that both during and post construction phases, a wider expansion of the number of turbines in the area (especially north and southwest) will constrain these birds further and increase the risk to the viability of the nest. Habitat to the north (Hill of Glaschyle wind farm, now in commission) and the south (the proposed Ourack wind farm) similarly constrains these and other raptor/owl species to the point of likely avoidance for hunting/feeding and any future establishment of breeding territories by new pairs of such species.

Lastly, in terms of monitoring, with developers themselves plus NGOs (e.g. SNH/RSPB) and other bodies such as the Scottish Raptor Study Group all attempting to 'do the right thing' and monitor birds and the wildlife in the development area, we are now perceiving a saturation of such to the point that the environmental monitors themselves could be causing disturbance. Intelligent use of local land workers (farmers, stalkers, etc.) should be considered and consulted on species activity, year-round and with an element of longevity far in excess of any shorter term, effectively snapshot-only studies.

4 Traffic Management

The current indication of construction traffic to access all three development sub-areas using roads widened for the Berry Burn development, via the A940 and the U89E Half Davoch loop road (through the Altyre Estate) would appear logical for the delivery of turbine elements. However, construction worker traffic for the 'only 12 turbine' Hill of Glaschyle wind farm build over 2015/2016 caused a number of issues along the same route (and from the A96 through the Mundole area onto the A940, south of Forres), including one head-on road traffic collision with injuries. Thankfully this did not include a school bus which uses the route four times on a weekday.

The different construction workers at the various phases, and presumed - in the majority - to be coming from the north if once again using R J Macleod of Dingwall for the civil engineering aspect, need to be correctly assessed in numerical terms and a proper evaluation made of the effects that will be seen especially if all 63 proposed turbines are approved. With environmental considerations in mind, study of alternative construction worker access for each of the three development sub-areas should be conducted to alleviate the single option currently presented, and strict site traffic rules established that apply to all of the affected public roads.

5 Water & Fisheries

In accordance with other wind farm developments affecting the rivers within the Finderne area (Findhorn, Mosset Burn) the principal issues relate to the potential impact on water quality and runoff from the site, the fish populations present within the burns draining the proposed site and on the management of riparian habitat within the development area.

The Rivers Findhorn and its tributaries support important populations of salmon and trout along with other species such as eel, lamprey, sticklebacks, etc.. The Findhorn is also an iconic river, its canyon-gorge like structure provides a unique and high challenging fishing experience. Both rivers have important and highly regarded salmon and sea trout rod fisheries which attract anglers from both the local area and further afield. This in turn provides considerable economic benefits to the local community. Therefore it must be afforded every protection regarding the water quality and fish stocks within each river.

In general the Scoping Report is well written covering most of the expected aspects associated with the development of a wind farm in an upland area. Various questions are asked throughout the document on the range of consultees, scope of study area is sufficient, and study methodologies. Q17, Q18, Q19, Q20, Q21 relate to water, fisheries and other habitats and we are confident that the methods proposed and range of consultees is appropriate provided close liaison is maintained with the Findhorn Fishery Boards and the Findhorn, Nairn and Lossie Fisheries Trust within the area.

Chapter 8 and Chapter 9 outline the rivers draining the proposed development. The proposed Clashgour wind farm impinges on a number of tributaries, to the west the Divie/Ourack/Allt Dearg and the Corrshellach and Reenlarig burns all within the Findhorn catchment.

The indicative site layout maps also indicate that a number of vehicle crossings on these burns will be required.

We are encouraged to see that fish survey data from 2014 and 2015 has been incorporated on pages 41 and 44 and indicate that important salmon and trout populations are present in the Divie/Ourack tributaries and trout dominate in the Corrshellach and Reenlarig.

Access and egress of migratory fish is a key factor in maintaining healthy fish populations. Accordingly we would wish to see that all river crossings are designed to ensure that all fish species migration is facilitated. To achieve that we recommend that bridges over large tributaries are of a clear span design. On small tributaries (1m or less) if culverts are to be used these must be sunk into the river bed to allow fish and sediment passage. Provision of additional flood relief culverts should also be included in the designs.

Wind farm developments of this size may potentially affect runoff to the adjoining watercourses and we are encouraged to see that this is recognised within Chapter 9. It is of paramount importance that throughout construction high quality measures to control silt runoff and other potential pollutants are installed and maintained.

We would welcome further opportunity comment on the construction method statement and mitigation measures proposed for the construction phase of the development in due course.

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