

# Clune Wind Farm Proposal

# Report on feedback



September 2024

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# 1. INTRODUCTION

### 1.1 Purpose of this report

The purpose of this report is to:

- summarise the written feedback received from the community during the June 2024 public
  exhibitions and subsequent consultation period regarding the design of the proposed development for
  Clune Wind Farm, and
- highlight any changes that have been made to the proposal since.

RES would like to put on record our thanks to the residents and community representatives who attended the exhibition events and/or provided feedback on the Clune Wind Farm proposal.

Each section in the report focuses on a key topic area and summarises the feedback received, followed by RES' response.

RES has considerable experience in developing onshore wind projects throughout the UK and believes in the importance of community consultation to identify issues and concerns, as well as benefits and opportunities, which can be considered when developing and designing a project.

### 1.2 June 2024 exhibitions and consultation

RES held two public exhibition events in the local area (Tomatin and Carrbridge) in June 2024 as part of its pre-application consultation on the proposed Clune Wind Farm. These events provided people with the opportunity to learn more about the project, discuss the proposal with the project team, and provide written feedback to RES on the preliminary site layout. RES advertised the events in the Inverness Courier and Strathspey Herald and sent an invitation to all households and businesses within 12km of the proposed development.

A range of information was made available at the exhibition, including several visualisations prepared to NatureScot guidance which helped to give an impression of what the site could look like from different viewpoints in the area. RES staff were on hand to discuss the proposal and answer any questions. A four-week consultation period followed the exhibitions for people to submit written feedback to RES on the proposal and early-stage design. We recorded 49 attendees who visited the exhibition in the Strathdearn Hub and 15 attendees in Carrbridge Village Hall. 14 comments forms were received by the time that the consultation period closed. There was a mix of feedback, including supportive, neutral and negative comments on the proposals.

RES accepts that the feedback on the comments forms may not be representative of the wider community due to the small number (14) returned to the RES team. However, the feedback gives a good summary of some of the key themes raised throughout the two days of the exhibition events.

RES included a multiple-choice question on the comments form that asked people about their attitude to the proposal for a wind farm at Clune. The breakdown of responses is as follows: 23% responded as 'supportive'; 31% responded as 'neutral'; 46% responded as 'opposed'.

RES also included a multiple-choice question that asked what people thought about the preliminary design layout. The breakdown of responses is as follows: 46% responded that they had concerns about the proposed layout; 46% responded that they were neutral to the proposed layout; 8% responded that they were happy with the proposed layout.

The consultation feedback submitted to RES has been considered by the project team as part of the design development, in addition to feedback from key consultees and the findings from the detailed technical and environmental studies that have been undertaken. We are grateful to everyone who took the time to engage with us on the proposal.

# 2. LANDSCAPE and VISUAL feedback

Both in verbal conversations with the project team at the exhibitions and in the comments forms, the most common feedback and comments was on the potential landscape and visual aspect of the proposal.

### 2.1 Key themes

The key themes and comments raised within the feedback were:

- Turbine height: turbines size; too visible over wide area.
- **General comments:** cumulative impact have enough wind turbines in this area; a number of developments being proposed in the area.
- Residential amenity: turbines will be visible from local properties; residential amenity will be affected.

### 2.2 RES response to landscape and visual feedback

We will take on board comments ahead of the next exhibition event in relation to landscape and visual comments.

The turbines being proposed for Clune are up to 200m in height. Wind turbine technology has advanced considerably in recent years, meaning that wind turbines are now taller and more efficient which enables them to generate a significantly greater amount of electricity per wind turbine. There are turbines consented in Scotland at 250m in height and operational wind farms in Scotland at 220m in height.

Modern taller wind turbines provide more electricity, which helps address the climate emergency and security of energy supply. The 200m tall wind turbines proposed at Clune Wind Farm would allow for far greater benefits in terms of renewable electricity generation per wind turbine than smaller turbines would.

We are looking to achieve a design that strikes an acceptable balance between the visibility of the proposal and its ability to generate significant amounts of renewable energy. Ultimately, the acceptability of this design will be assessed by the determining authority in relation to current energy policy and planning requirements having considered feedback from consultees as well as representations by members of the community and wider public.

The Scottish Government's Onshore Wind Policy Statement, published in December 2022, states in paragraph 3.6.1 that "Meeting our climate targets will require a rapid transformation across all sectors of our economy and society. This means ensuring the right development happens in the right place. Meeting the ambition of a minimum installed capacity of 20 GW of onshore wind in Scotland by 2030 will require taller and more efficient turbines. This will change the landscape."

At our June 2024 public exhibition events we provided four visualisation boards showing how the proposal may look based on the preliminary site layout from four viewpoints within the local area. These viewpoint locations were selected in order to demonstrate the most "localised" effects of the proposed development, which would be of most interest to people attending the exhibitions. At the next exhibitions scheduled to take place in September 2024, we will plan to update these visualisations with the updated design as well as new visualisation locations. All visualisations were and will continue to be produced to well established and recognised standards set by NatureScot.

## 3. ENVIRONMENT feedback

A number of respondents provided comments in relation to the potential impacts on the surrounding environment.

### 3.1 Key themes

The key themes and comments raised within the feedback were:

- Wildlife: concerns about potential impact on wildlife (ecology and ornithology) including birds of prey.
- **General**: general comments and enquiries about the preservation and management of the environment surrounding the wind farm.

### 3.2 RES response to environment feedback

Environmental Impact Assessments (EIAs) are a compulsory part of the planning and consenting process for wind farms. The purpose of an EIA is to investigate and mitigate any potential effects of a development on the natural, physical and human environment.

Protecting and minimising any potential direct or indirect impacts on local wildlife and their habitats is of utmost importance and we take this responsibility seriously. We look to mitigate any potential effects of the development during construction and operation on the habitats and protected species that are found to be present or active within the site.

The findings from the wide range of technical studies and environmental surveys (including Archaeology and Cultural Heritage; Hydrology, Hydrogeology and Geology; and Ornithology and Ecology among others) that have been undertaken over the last couple of years will be written up in a comprehensive Environmental Impact Assessment Report (EIAR) which the Scottish Ministers will take into account when deciding whether or not to grant consent for the wind farm.

For instance, a wide range of detailed ecological surveys have been undertaken by qualified ecologists as part of the non-avian Ecological Impact Assessment (EcIA). The non-avian EcIA survey and assessment work is an extensive undertaking, and the findings will be included in the EIAR.

The planning application and associated documents such as the EcIA and survey data (excluding any confidential annexes) will become available for public viewing and comment as part of the formal consultation period which will be run by the Scottish Government's Energy Consents Unit once the planning application is submitted.

We are in consultation with relevant consultees, including Highland Council, NatureScot, SEPA, RSPB Scotland, and Marine Scotland Science with regard to designated sites, protected areas and protected species.

As part of the project design we are also developing an outline Habitat Enhancement and Management Plan for the site which will set out the measures being proposed for the site, including a plans for biodiversity enhancement which will focus on improving the biodiversity already found on the site beyond offsetting any potential loss of biodiversity from the proposed development. Although any enhancement measures proposed will look to offset potential impacts of the project, primarily they will seek to complement the existing conditions for flora and fauna while expanding their effective reach as much as is practicable.

RES has begun to look at ways in which it can help support the restoration of peatland areas and continue the great work that has been ongoing since the early 2000's to help regenerate the natural forests of the Kinveachy forest through active forest management programmes.

# 4. TRANSPORT/CONSTRUCTION feedback

A number of respondents provided comments focused on construction traffic, including timings of the development in relation to the planned dualling of the A9 between Moy and Tomatin.

### 4.1 Key themes

The key themes and comments raised within the feedback were:

- Transport route: timing in relation to the dualling of the A9
- Site access: opening the site up to cyclists and walkers once the wind farm is operational

### 4.2 RES response to transport / construction feedback

Since the June 2024 exhibitions, the Scottish Government has awarded the contract for the Moy to Tomatin dualling and set out a timetable. RES is on the Scottish Government's database to receive updates on the dualling programme. Should Clune Wind Farm be consented, construction of the development is not expected until the completing of the dualling of the Moy to Tomatin section of the A9.

The indicative turbine delivery route does not go via any of the nearby settlements.

RES has begun discussions with the Highland Council and Network Rail regarding using the Reigbeg Railway bridge for access into the site entrance. Early discussions between the council and rail operator have concluded that the bridge in its current condition would be unsuitable for oversized vehicles. RES is exploring options of either refurbishing or replacing the bridge which would bring positive benefits to the council, network operator and wider community.

RES has begun exploring providing car parking spaces at the site entrance near the Reigbeg railway bridge to facilitate members of the public who wish to access the land surrounding the proposed development recreationally. We are hoping to establish recreational routes as part of the proposals for the wind farm that are safe and accessible for the general public post construction.

RES has commissioned surveys to understand traffic flows and volumes on local roads and assess any potential impacts of construction traffic on the local area. This has enabled RES to identify potential pinch points, bottle-necks, and areas which may require traffic management and will help in developing mitigation strategies. The data collected from the traffic surveys will be presented in the Traffic and Transport chapter of the extensive Environmental Impact Assessment Report (EIAR) that will accompany the planning application.

Should the project be consented, a detailed Traffic Management Plan would be developed and agreed with Highland Council in consultation with Police Scotland, setting out the steps that RES would take to help mitigate any potential impacts on local traffic and road users and ensure road safety. Some examples of measures that have been taken by RES on other construction projects include: introducing a reducing speed limit for project construction traffic along certain stretches of road; avoiding turbine deliveries between school-drop off and pick-up and/or rush-hours; delivering turbine components at night-time; and, agreeing certain 'routes to site' for daily construction traffic.

As part of the traffic assessment and data-gathering process RES has also commissioned turbine delivery-specific surveys - including swept path analysis along the proposed turbine delivery route as well as detailed assessment of the site access point with regard to visibility splays and safety requirements.

RES often establishes local Community Liaison Groups (CLGs) during the construction phase of a wind farm to support regular engagement with the local Community Councils and wider public - in addition to project communications and updates via local newsletters and the project website. This approach ensures that questions and concerns or opportunities can be raised to RES and encourages a constructive dialogue to ensure that the project is delivered with consideration to the local community.

RES' construction team has a wealth of experience in managing construction traffic, having built many wind farms within Scotland and across the UK and Ireland, and works closely with the local community to minimise disruption wherever possible. RES also has a strong track record for safety on its projects and within the company's culture. In fact, RES recently won Health and Safety Team of the Year at the 2022 Safety and Health Excellence (SHE) Awards.

# 5. COMMUNITY BENEFITS feedback

Community Benefit Funds and a Local Electricity Discount Scheme (LEDS) were main topics both in verbal discussions at the exhibition and in the comments forms. The communities are experienced in community benefit funds from operational wind farms in the area.

In response to the question on ideas for the use of a tailored community benefits package, the following comments were received:

- Offer apprenticeships and educational opportunities.
- Yes to LEDS not for holiday homes or 2<sup>nd</sup> homes, base it on the electoral register
- Use it to support local schools.
- A review of some issues raised by the community at the "Big Conversation" in Carrbridge for the use
  of the Community Benefit Fund.
- Biodiversity, rewilding and peat repair.

### 5.1 RES response to community benefits feedback

Should the project be consented, a community benefit package will be established to support the communities who host, and are closest to, the project.

RES is proposing a tailored package of benefits for the community from Clune Wind Farm that would be worth £5,000 per megawatt (or equivalent) of installed capacity per annum.

We take a tailored approach and consult with the local community, both pre-planning and post-consent (should the project be granted planning permission), to gain an understanding of the local priorities and to seek suggestions for projects that will help to secure long-term economic, social and environmental benefits for the area. This approach ensures the community benefits package that is delivered is aligned with the priorities of the local community, which may involve initiatives that sit outside the parameters of a traditional application-based fund.

This package could include RES' unique Local Electricity Discount Scheme (LEDS), something that has received significant interest from the community at the exhibition events as it delivers direct and tangible benefits through offering an annual discount to the electricity bills of those living and working closest to a participating operational wind farm. There was strong support at the Clune exhibition events for a LEDS scheme if Clune was given the go ahead.

Should the project receive consent, the area of benefit for Clune Wind Farm will be determined in consultation with community representatives from the closest communities. It is important to note that voluntary community benefits are not a material planning consideration.

RES is also committed to ensuring that, wherever reasonably practicable, local contractors and employees are used in all aspects of wind farm development and we are also committed to exploring/offering shared ownership should there be interest in the local community.

Further afield, RES has partnered with the University of the Highlands and Islands (UHI) to support a minimum of 60 students through their Student Development Fund.

Created with the aim of helping UHI's students to further their personal development, the fund empowers them to gain new skills, raising their aspirations, whilst also helping to build their confidence. It does this by providing financial support to students to overcome barriers to participate in learning opportunities and extracurricular activities. RES has pledged a total of £60,000 to UHI's Student Development Fund over the course of the next three years, providing the students of UHI with the best possible opportunity to maximise their talents and future careers.

As the renewables industry continues to grow, particularly in the Highlands and Islands, the industry will require talented individuals with transferrable skills, from a variety of diverse backgrounds to enter the workforce. The growing industry will also support the wider regional economy and the jobs associated with it. The Student Development Fund, supported by RES, will therefore be open to all UHI students, studying any course, across all its campuses.

# 6. EXHIBITION and GENERAL PROJECT feedback

RES included a multiple-choice question on the comments form that asked people to what extent they felt they had increased their knowledge of the Clune Wind Farm proposal having visited the exhibition. The breakdown of responses is as follows: 77% responded 'quite a lot' or 'a lot'; 15% responded 'a little'; and 8% responded 'very little' - highlighting a majority of respondents felt the exhibition was helpful in terms of information available. Comments included 'clear and concise' and 'Staff very knowledgeable and helpful' -

one comment highlighted the need for the exhibitors to have more knowledge on landscape and ecological questions.

### 6.1 RES response to exhibition and general project feedback

We are grateful to everyone who provided feedback on the early stage design at the public exhibition events we held in June 2024 in the local area to engage with people on the proposal (and during the subsequent consultation period).

The purpose of this first round of public exhibitions was to provide people with an opportunity to review the preliminary plans for Clune Wind Farm, speak with the project team and ask any questions. These events provide people with an opportunity to submit written feedback to RES and it is invaluable to the RES team to get direct feedback and comments on the proposed development.

We will showcase the updated design at our next public exhibitions on 18 and 19 September 2024, which includes the removal of a turbine and moving other turbines on site. Following feedback from the next round of exhibitions and updates to the proposed development, RES expect an application submission later in 2024.