

West Loch Awe Timber Haul Route and Carraig Ghael Windfarm Access
Summary of Consultee Responses to Environmental Statement

1. West of Scotland Archaeology Service – expressed concern that they were being asked to respond direct to FCS rather than through the local Council. Some reservations on the integrity of the archaeological data used in ES as Pastmap not fully serviced. Recommended use of an alternative on-line dataset. Confirmed they were happy with conclusions in ES and offered some specific improvements to protective measures at 2 locations. Reluctantly agreed to offer further support to applicants in developing mitigation, but pointed out that FCS should be offering that support, not WoSWAS.

2. Historic Scotland – confirmed that no SAMs directly affected by routing, although expressed concerns that settings of nearby monuments may be adversely impacted unless general landscaping works associated with the road are to a high standard. Some lower graded Listed Buildings are within the 1 Km zone around the route and these need to be subject to consultation with Local Authority.

3. SEPA – despite not participating in the Scoping/Screening process prior to the ES being drafted and also despite a last minute response to the ES Consultation, SEPA have delivered a very robust response covering a number of issues and sensitivities that will require careful handling.

- a. They ask for a clearer justification for the development and have requested better analyses of the beneficial consequences on heavy traffic use of the C30 and B845 Roads.
- b. SEPA require improved analyses perhaps with substantial route changes, mainly to reduce the frequency of culverted watercourse crossings and increased use of bridges on main watercourses. They see culverting as the least desirable option and require that approach to be minimised.
- c. They challenge the use of the 100m buffer zone as being inadequate to cover the sensitivities impacted by the route. They request a peat depth survey to inform the selection of best options.
- d. They ask for details of sections where peat depth will lead to the use of floating roadway.
- e. They are concerned that the ES makes no reference to the inclusion and the management of an on-site concrete batching plant and associated working and distribution systems.
- f. There are concerns on how the Construction Method Statements along the 38Km length of the route will be woven into the planning work and contend that these will need to be agreed with the Local Planners and with SEPA.
- g. SEPA declare a key requirement to have full pollution prevention measures in place for all phases of project.
- h. They identify lack of cover on how waste arisings from the project will be managed and will require a site-specific waste management plan in full compliance with National Strategy, licences and Waste Regulations. They pose a particularly demanding requirement that any activity affecting peat

will require to demonstrate that the work will not release any Carbon through oxidation.

- i. SEPA will be enforcing all Water Environment and Controlled Activities procedures and comment that the developers have as yet made no contact with them on these matters.
- j. SEPA point out concerns that the Hydrogeological Assessment in the ES is deficient in a number of key areas and have produced a specialist supplementary report with their response. That indicates a number of issues requiring to be analysed and considered in much more detail than undertaken thus far.

4. Argyll Fisheries Trust – whilst generally positive in their response, AFT identify some concerns on the proposed crossing point on the River Avich for reasons of concern on sedimentation and other adverse impacts on fish. They would wish to see the crossing point relocated further downstream away from the most sensitive section.

They also present concerns that many smaller watercourses contain sensitive species likely to be adversely affected by sedimentation and that these will require more detailed plans developed to protect fisheries features.

AFT consider that specific measures will be need to be put in place and agreed with AFT to ensure careful monitoring and recording of operational activity during construction activity.

5. SNH – at the time of writing, SNH have not yet delivered any substantive representations on the proposals, but have indicated that they have particular concerns on a number of sensitivities which they will require to be addressed with the developers as a condition of EIA Consent. These include concerns over damage to native riparian woodland along the river Avich where rare lower plant communities are believed to be present and at risk from tree cutting and engineering works. They express some concerns over impacts on Blanket Bog habitats being within the operational corridor of the proposed roadway.

They have made specific reference to their concerns over potential adverse impacts on FWPM in the River Avich system. SNH have also raised some questions on whether the road construction and the use of borrow pits can be safely classed as Permitted Development under the normal definition because the purpose of the access road is not just to serve forestry interests, but also for the windfarm access.

SNH have also expressed informally some concerns over disturbance of some endangered species (Divers and Raptors and badgers) but consider that these mainly relate to breeding season disturbances which can be dealt with through careful scheduling of particular operational activity.

I am awaiting a formal written response from SNH covering all these issues, but since some work is in progress at present to provide better information on these species, it may be some time before SNH will be in a position to deliver a formal response. They have indicated an intention of placing a 'holding objection' on the proposals to allow that preparatory work to continue.

6. Argyll and Bute Council – A+BC Roads Engineers have engaged and responded to the ES consultation. They declare concern on adjacency issues

involving increased vehicular activity being brought onto public roads that may not be specified to cope with the altered loading and use. They also mention concerns over related environmental issues like traffic noise, air quality and public road safety and will require the developers to work with them in producing a plan minimise impacts and deal with any mitigation and special improvement measures needed to protect the public roads.

7. Loch Avich Estates – express concern that the route running up and crossing over the River Avich will destroy the special ambience of this quality area and harm local tourism related business based on the high quality of the local environment.

8. Avich and Kilchrenan Community Councils – this group has been particularly active in identifying issues and raising challenges to these proposals. They have delivered a series of written and verbal representations and supplementaries covering a wide range of concerns –

- a. They express concern that FCS may stand at risk of breaching it's own regulations in accommodating the transport of wind turbine traffic for Carraig Ghael.
- b. They see the proposed use of the B845 for windfarm development as contrary to the Councils specific exclusion of that road in the original windfarm planning consent.
- c. The bridge crossing of the River Avich is of concern and they consider that no consent be granted until detailed design has been presented for approval and related landscape impacts fully addressed.
- d. There are concerns over apparent inaccuracies in identifying water supplies along the route, including community water supplies, which are seen as vulnerable and without adequate protective measures specified.
- e. A+KCC anticipate serious sedimentation problems with the route selected and during various stages of the proposed development. They challenge the developers view that this as a low probability risk and contend that serious problems arising on other windfarm development sites in building access will invariably present with this project.
- f. The impact on local Blanket Bog along sections of the construction route is seen as contrary to the EU Habitats Directive and in their view cannot be consented without infraction. They also challenge the proposals as breaching A+B Biodiversity Action Plan, which requires the full protection of all bog and peatland habitats.
- g. Concerns are declared over the scale of quarrying associated with the proposed access route and are of the view that these works may require Planning Consent, in view of their scale and the need to utilise the material for the development of the consented windfarm at Carraig Ghael.
- h. A+KCC raise a similar point to SNH with the concern that the timber haul route cannot be covered as Permitted Development under the forestry regulations when it is clearly intended to serve as joint use for a commercial windfarm. They believe that even the routing and the specification of the access are far in excess of forestry needs due to the influence of the windfarm interest and have asked that Planning

Application be required in line with Whitelee and other major Section 36 windfarm consents.

- i. Many other observations, procedural suggestions, related background papers and even legal Precognition have been offered by A+KCC in their various written submissions to illustrate the kinds of concerns they have with the windfarm development and the associated forest access roading.

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