Environmental Impact Assessment Report

Beinneun 2 Wind Farm

Volume 3

Technical Appendix A12.3: Shadow Habitats Regulations Appraisal for the River Moriston SAC

Document prepared by Raincloud Consulting for Beinneun 2 Ltd

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Contents

1 INTRODUCTION

1.1 BACKGROUND

Raincloud Consulting was commissioned by Envams on behalf of Beinneun 2 Ltd to undertake a shadow Habitats Regulation Appraisal (HRA) to determine whether the proposed Beinneun 2 Wind Farm and associated infrastructure (the Development) would have any adverse impact on the integrity of the River Moriston Special Area of Conservation (SAC), which is classed as a European designated site.

The Development will be constructed outside of any SAC, Special Protection Area (SPA) and Ramsar Site. The location of the Development in relation to the River Moriston SAC is provided in Figure 1 of this report.

This report includes information for the Competent Authority to allow it to determine whether the proposed works are likely to have a significant effect on European designated sites with regard to their conservation objectives and whether the Development will have an adverse effect on the integrity of the River Moriston SAC, which is a European designated site, with and without mitigation.

1.2 SCOPE OF REPORT

A shadow Habitats Regulations Appraisal (HRA) is necessary to evaluate whether the Development, either on its own or in combination with other plans or projects, could negatively affect the integrity of any European designated site. Although the responsibility for carrying out the HRA lies with the relevant competent authority (the Highland Council (THC)), this document is intended to support them in undertaking Stage One (Screening – Section 5) and Stage Two (Appropriate Assessment – section 6) of the process by:

- Outlining the details of the Development;
- Identifying relevant European designated sites that are linked to or may potentially be influenced by the Development;
- Examining how the proposed activities might affect the qualifying features of these designated sites;
- Reviewing other developments that may contribute to cumulative ("in combination") impacts;
- Highlighting which sites should proceed to further stages of assessment where likely significant effects on qualifying features cannot be excluded; and
- Providing an evaluation of the Development and the potential effects on the features identified as requiring assessment.

The following report does not assess SPAs within the vicinity of the Development. The Development impact on the integrity of SPAs is covered within Chapter 7: Ornithology of the EIA Report.

The following report focuses on SACs within the vicinity of the Development, as no Ramsar Sites are located within a 20 kilometre (km) radius of the Development and Ramsar Sites have, therefore, been scoped out.

1.3 RELEVANT LEGISLATION AND POLICY

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (commonly referred to as the ‘Habitats Directive’) establishes a framework of legal protection for habitats and species considered to be of European significance. Articles 3 through 9 outline the legal provisions for safeguarding these features by creating and maintaining a network of European protected sites. These areas support habitats and species that are rare or particularly vulnerable. The aim of this network is to ensure that these natural habitats and species are preserved or, where necessary, restored to a favourable conservation status across their natural geographical distribution.

The process to be followed when assessing the potential impacts of the Development on European sites is detailed in Article 6 of the Habitats Directive. In Scotland, this process is applied through the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), commonly referred to as the ‘Habitats Regulations’.

Article 6(3) of the Habitats Directive defines the legal tests that must be met for any plan or project that may have significant effects on a European site or risk affecting its overall integrity (see Annex 1.1 of the Habitats Directive). This provision sets the requirement for what is known as an Appropriate Assessment (AA):

"*Any plan or project not directly connected with or necessary to the management of the* [European] *site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public*."

1.4 CONSULTATION

A scoping report was submitted to Scottish Ministers in November 2023 and a Scoping Opinion was received in February 2024 (this is provided in the EIA Report, Technical Appendix A2.1).

Table 1 outlines the consultation responses relevant to the shadow HRA.

Further details regarding consultation responses relating to ecological and ornithological receptors can be found in Chapter 6: Ecology and Chapter 7: Ornithology.

Table 1: Consultee scoping comments

Consultee	Consultee comments	Applicant response
NatureScot	In order to comply with the Habitats Regulations, Habitats Regulations Appraisals will have to demonstrate that the proposed development will not adversely affect the integrity of European sites in particular the West Inverness-shire Lochs Special Protection Area (for which we would encourage the applicants to discuss their scope of survey and assessment with us further); and the River Moriston Special Area of Conservation.	This shadow HRA document outlines the potential impacts from the Development, including cumulative impacts, to the River Moriston SAC.

2 METHODOLOGY

2.1 OVERVIEW OF THE HRA PROCESS

The shadow HRA follows a four-stage approach. A key feature of this process is its sequential nature; each stage's findings determine whether it is necessary to proceed to the next. The stages are summarised as such:

Stage 1 – Screening:

The initial phase of the HRA process involves determining whether the proposed plan or project will have a *'Likely Significant Effect'* (LSE) on a European designated site, either on its own or in combination with other projects or plans. If it is concluded that no such effect is anticipated, the project can be approved without further assessment. However, if potential effects cannot be ruled out, the process moves to Stage 2 - the Appropriate Assessment.

Stage 2 – Appropriate Assessment (AA):

Where it is concluded that an LSE on a European site cannot be excluded, the competent authority is required to undertake an Appropriate Assessment (AA). This assessment must consider the potential implications of the plan or project in relation to the conservation objectives of the relevant site. The purpose of the AA is to enable the competent authority to decide whether the plan or project would result in an adverse effect on the integrity of the European site. If it can be established, beyond reasonable scientific doubt, that no such adverse effect would occur, consent may be granted. If this level of certainty cannot be achieved, the process must continue to Stages 3 and 4.

Stage 3 – Assessment of Alternatives:

If it is found that the proposed plan or project would (or may) compromise the integrity of a European site, and a precautionary approach is warranted, then alternative options must be explored. These alternatives must be capable of meeting the same objectives as the original proposal but without causing harm to the designated site. If no viable alternatives exist, the process proceeds to Stage 4.

Stage 4 – Imperative Reasons of Overriding Public Interest (IROPI):

In situations where the plan or project is expected to adversely affect a European site's integrity and no alternative solutions are available, it may still be permitted but only if it is justified on the basis of imperative reasons of overriding public interest. In such cases, appropriate compensatory measures must be put in place to ensure the overall coherence of the European site network is maintained.

2.2 SCREENING

The screening stage assess whether the Development is likely to have or may potentially have significant effects on the European designated site. A list of all SACs located within a 10 km radius of the Core Study Area are considered. The qualifying features of each site were identified, followed by a summary of the conservation objectives required to maintain the integrity of those sites.

In line with NatureScot[1] guidance, the screening process is used to establish whether an Appropriate Assessment (AA) is necessary, by:

- Determining whether a project (or plan) is directly connected with or necessary to the conservation management of any European sites;
- Describing the details of the project (or plan) proposals and other projects that may cumulatively affect any European sites;
- Describing the characteristics of relevant European Sites; and
- Appraising likely significant effects of the proposed project on relevant European Sites.

The purpose of the screening stage is to arrive at one of the following conclusions:

- An AA (Stage Two) is required where, based on objective evidence, it cannot be ruled out that the Development, either individually or in combination with other developments may have a significant effect on a European Site; or
- An AA (Stage Two) is not required where, using objective information, it can be clearly determined that the Development, either individually or in combination will not result in a significant effect on any European Site.

2.3 APPROPRIATE ASSESSMENT

The AA determines whether a LSE identified during the screening stage will lead to an adverse impact on the integrity of the European site in question, with respect to its conservation objectives. In line with guidance from NatureScot, the assessment of the proposal's potential effects on the qualifying features of designated sites is carried out through the following steps:

- Compiling the necessary evidence to inform the assessment, including site-specific documentation, relevant scientific studies, EU and UK impact assessment guidance, and comparable assessments from similar developments;
- Forecasting the potential impacts, including their nature (e.g. direct or indirect) and duration (e.g. short-term or long-term);
- Determining whether these impacts would compromise the integrity of the site, based on its conservation objectives and current condition. The precautionary principle applies at this stage—if it cannot be shown, with supporting evidence, that there will be no adverse effects, it must be assumed that such effects could occur; and
- Considering whether any adverse effects identified can be mitigated effectively.

[1] NatureScot (2025) Habitats Regulations Appraisal (HRA) [Online] https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra (Accessed 30/07/2025).

2.4 CUMULATIVE EFFECTS

An assessment under Regulation 63(1) of the Conservation of Habitats and Species Regulations (2017) it is required to consider whether the Development is likely to have a significant effect on the European designated site individually or in combination with other developments.

The following will be considered:

- Consented but uncompleted developments of a similar nature to the Development;
- Submitted applications which are awaiting a decision; and
- Authorised ongoing operations, including discharge permits, water abstraction licences, and consecutive or concurrent maintenance works (or similar).

3 DESCRIPTION OF THE DEVELOPMENT

The Development is situated approximately 5.4 km northwest of Invergarry, and approximately 11.3 km west of Fort Augustus. The Development comprises of a wind powered electricity generating station, including battery energy storage, and is described in EIA Report Chapter 4: Development Description.

The windfarm consists of 19 wind turbines of up to 200 m in height to blade tip and 27 no. 40-ft (or equivalent) battery containers and ancillary infrastructure. The total export capacity of the Development (wind turbines and BESS) is will produce between 100 – 300 MegaWatts (MW).

3.1 CONSTRUCTION PHASE

The construction phase of the Development is estimated at a duration of 18 months. The Development would require the following components:

- Associated foundations and crane hardstandings at each wind turbine location;
- Access tracks linking the turbine locations comprising of 17.5 km of new tracks;
- One meteorological mast;
- Network of underground cabling;
- Four borrow pits;
- New substation compound; and
- Two construction and storage compounds, one of which will be at the BESS/substation compounds.

3.2 OPERATION AND MAINTENANCE PHASE

It is expected that the Development will operate for 40 years from full commissioning of the turbines.

Regular site inspections and the servicing of turbines will be carried out in accordance with the manufacturer's specification. Ongoing track maintenance will be undertaken to ensure safe access is maintained to all parts of the Development all year round.

All waste arising from servicing and maintenance will be removed from the Site and reused, recycled or disposed of in accordance with legal and best practice.

3.3 DECOMMISSIONING PHASE

The decommissioning phase is estimated to be approximately 12 months.

All material arising from demolition during decommissioning will be recycled where possible or otherwise will be disposed of to a suitably licensed waste management facility, in accordance with current waste management regulations at the time.

3.4 NEED FOR THE PROJECT

The need for the Development has been outlined within the Planning Statement that accompanies the application for Section 36 consent.

4 BASELINE

Full details on the habitats present within the Ecology Study Area are provided in the EIA Report Chapter 6: Ecology.

Baseline information was gathered through a desk-based study and fish survey, conducted in summer 2024 by the Ness District Salmon Fishery Board.

European designated sites within a 10 km radius of the Core Study Area were searched for, the River Moriston SAC is the only European designated Site within the search area.

A summary of the qualifying features of the River Moriston SAC, including the key threats and pressures to the site's integrity and the potential impact pathways linked to the Development, is presented in Table 2.

Table 2: Summary of European Sites within 10 km of the Development

European Designated Site	**Approximate distance from Development**	**Qualifying Species**	**Pressures to the site's integrity**	**Potential impact pathways to the Development**
River Moriston SAC	2.78 km north from the access track	Atlantic Salmon (*Salmo salar*) Freshwater Pearl Mussel (*Margaritifera margariteria*)	• Forestry operations. • Invasive species. • Over gazing. • Water management. • Statutory undertaker. • Wildlife crime.	Loss of habitat (permanent and/or temporary). Disturbance or degradation of habitat (permanent and/or temporary). Chemical pollution. Siltation of watercourses.

5 STAGE1: SCREENING FOR LIKELY SIGNIFICANT EFFECT (LSE)

5.1 POTENTIAL CONSTRUCTION IMPACTS

The majority of the potential effects of the Development will be during the construction phase. Potential effects of the Development on the River Moriston SAC are considered below:

- Temporary or permanent direct or indirect loss of habitats;
- Temporary or permanent direct or indirect disturbance or degradation of habitats;
- Chemical pollution (including acidification) of watercourses, which may have a direct effect on Atlantic salmon and freshwater pearl mussel, their food sources and habitats; and / or
- Siltation of watercourses, via the generation of silt laden run-off. Direct effect on Atlantic salmon and freshwater pearl mussel such as inhibiting of respiration through affecting gill function. Silt also effects the watercourse habitats, such as the infill of salmon redds spawning grounds. Siltation may also result in increase nutrient status, leading to the eutrophication of the aquatic protected species' habitat.

5.2 SUMMARY OF LIKELY SIGNIFICANT EFFECTS

The screening assessment for likely significant effect is provided in Table 3.

Due to the distance between the Development and the SAC, the Development will not result in the temporary or permanent direct or indirect loss of habitat within the River Moriston SAC.

Table 3: Screening for Likely Significant Effects

European Designated Site	Approx distance from Development	Conservation Objectives	Qualifying Features	Likely Significant Effect (LSE)	Screening Assessment
River Moriston SAC	2.78 km north from nearest point of access track	1. To ensure that the qualifying features of the River Moriston SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status. 2. To ensure that the integrity of the River Moriston SAC is restored by meeting objectives 2a, 2b, 2c for each qualifying feature (and 2d for freshwater pearl mussel). a. Restore the population of: • freshwater pearl mussel as a viable component of the site • Atlantic salmon, including range of genetic types, as a viable component of the site b. Restore the distribution of: • freshwater pearl mussel throughout the site • Atlantic salmon throughout the site c. Restore the habitats supporting: • the freshwater pearl mussel within the site and availability of food • Atlantic salmon within the site and availability of food 3. Restore the distribution and viability of freshwater pearl mussel host species and their supporting habitats	Atlantic salmon *(Salmo salar)*	Pathway for LSE identified Based on the SEPA Obstacles to Fish Passage Map, there is an impassible barrier located at the outfall of the Loch Loyne. No fish were present in Allt Garbh Doire as per the Fish Survey. Therefore, Atlantic Salmon are not present at the nearest watercourses to the Development. However, the Loch Loyne and Allt Garbh Doire connect to the River Moriston via River Loyne, providing a potential pathway for potential pollution (chemical and silt) to enter the tributaries and ultimately into the River Moriston. This could result in mortality or deterioration of the habitat supporting Atlantic Salmon.	Scoped in
			Freshwater pearl mussel *(Margaritifera margariteria)*	Pathway for LSE identified Based on the SEPA Obstacles to Fish Passage Map, there is an impassible barrier located at the outfall of the Loch Loyne. No freshwater pearl mussel were present in the survey area including River Moriston. It cannot be concluded that freshwater pearl mussel are not present in the River Moriston SAC. However, the Loch Loyne and Allt Garbh Doire connect to the River Moriston via River Loyne, providing a potential pathway for potential pollution (chemical and silt) to enter the tributaries and ultimately into the River Moriston. This could result in mortality or deterioration of the habitat supporting Freshwater Pearl Mussel.	Scoped in

After reviewing, analysing, and assessing the available information, particularly with respect to the characteristics of the Development and the potential for significant effects on the River Moriston SAC, as a conservative approach, an Appropriate Assessment is required..

6 APPROPRIATE ASSESSMENT (AA): RIVER MORISTON SAC

The following section applies the AA to the River Moriston SAC without the consideration of mitigation measures. Mitigation measures are outlined in Section 8.

The AA will outline the potential impacts on the River Moriston's integrity in relation to the conservation objections.

The River Moriston conservation objectives include:

- To ensure that the qualifying features of the River Moriston SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status; and
- To ensure that the integrity of the River Moriston SAC is restored by meeting objectives 2a, 2b, 2c for each qualifying feature (and 2d for freshwater pearl mussel) (conservation objectives are provided in Table 3).

To support these objectives, any actions that could cause a long-term decline in Atlantic salmon populations, hinder their recovery, restrict access to spawning habitats, or degrade water quality should be avoided.

Before the assessment is applied, it should be noted that most of the infrastructure associated with the Development is located outside the catchment of the River Moriston, as shown in Figure 2 of this report.

The infrastructure located within the catchment includes:

- Approximately 4 km of access track;
- Two potential borrow pit locations;
- One temporary construction compound;
- Three wind turbines and turbine laydown areas; and
- One meteorological mast.

All watercourses on site that are within the River Moriston catchment discharge into Loch Loyne, except Allt Garbh-Dhoire which is a direct tributary of the River Loyne. The River Loyne is a direct tributary of the River Moriston, at a point covered by the SAC designation.

Table 4 outlines the potential impacts on the River Moriston's integrity in relation to the conservation objectives.

Table 4: Appropriate Assessment of the potential impacts of the Development on the River Moriston SAC in the view of its conservation objectives

Qualifying Feature	Potential Impacts on Site Integrity	Conclusion
Conservation objective 1: To ensure that the qualifying features of the River Moriston SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.		
Atlantic Salmon	The latest assessed condition is classified as Unfavourable (2015). The nearest Development infrastructure is located approximately 2.78 km south of the therefore is unlikely to impact the integrity of the SAC.	No adverse effects on integrity
Freshwater Pearl Mussel	The latest assessed condition is classified as Unfavourable (2019). No freshwater pearl mussels were recorded during the fish survey (not considered conclusive). The nearest Development infrastructure is located approximately 2.78 km south of the SAC therefore is unlikely to impact the integrity of the SAC.	No adverse effects on integrity
Conservation objective 2a: Restore the population of: • Freshwater pearl mussel as a viable component of the site; and • Atlantic salmon, including range of genetic types, as a viable component of the site.		
Atlantic Salmon Freshwater Pearl Mussel	The Development infrastructure is located outside the immediate environment of the River Moriston SAC and therefore no direct or indirect loss to Atlantic Salmon nor Freshwater Pearl Mussel will occur. Given the distance of the development infrastructure to the River Moriston, direct or indirect disturbance or degradation of habitats is unlikely. Potential disturbance or degradation may occur through chemical pollution and siltation of watercourses. Chemical pollution may enter the watercourses due to construction activity. The unnamed watercourses within the north of the Development Site boundary discharge into Loch Loyne, with the exception of Allt Garbh Doire, which drains to the River Loyne, downstream of the outfall of Loch Loyne. The impounding effect of the Loch will promote dilution of chemical releases from the majority of the Development located within the catchment of the River Moriston, in the absence of good practice or mitigation. Chemical pollution would travel over 4 km before entering the SAC. Given the distance required to travel before entering the SAC, chemical pollution is likely to be deposited or diluted in transition from the Allt Garbh Doire and River Loyne to the SAC. Siltation from the construction activities of the Development may enter watercourses, unnamed watercourse and Allt Garbh Doire which is hydrologically connected to the SAC. Silt that enters any unnamed watercourse within the Site boundary will discharge into Loch Loyne. Due to the impounding effects of Loch Loyne's retaining walls and	No adverse effects on integrity

Qualifying Feature	Potential Impacts on Site Integrity	Conclusion
	controlled outflow, should silt be transferred from the Development to the Loch it will settle to the bed of the loch and is therefore unlikely to enter the SAC. Silt that enters Allt Garbh Doire will likely be entrained in vegetation or deposited within watercourses on route to the SAC as there is a manmade structure within the watercourse that effectively dewaters the bottom 500 m of the watercourse therefore no silt is likely to enter the SAC.	
Conservation objective 2b: Restore the distribution of: • Freshwater pearl mussel through the site; and • Atlantic salmon throughout the site.		
Atlantic Salmon	Conservation object 2a rationale can be applied to conservation object 2b.	No adverse effects on integrity
Freshwater Pearl Mussel	Conservation object 2a rationale can be applied to conservation object 2b.	No adverse effects on integrity
Conservation objective 2c: Restore the habitats supporting: • Freshwater pearl mussel within the site and availability of food; and • Atlantic salmon within the site and availability of food.		
Atlantic Salmon	Conservation object 2a rationale can be applied to conservation object 2c.	No adverse effects on integrity
Freshwater Pearl Mussel	Conservation object 2a rationale can be applied to conservation object 2c.	No adverse effects on integrity
Conservative objective 3: Restore the distribution and viability of freshwater pearl mussel host species and their supporting habitats.		
Atlantic Salmon	Conservation object 2a rationale can be applied to conservation object 3.	No adverse effects on integrity
Freshwater Pearl Mussel	Conservation object 2a rationale can be applied to conservation object 3.	No adverse effects on integrity

7 IN COMBINATION EFFECTS

7.1 STAGE 1: SCREENING FOR LSES IN COMBINATION WITH OTHER PROJECTS

The HRA process requires that potential impacts are considered **in combination** with other plans and projects. This ensures that cumulative effects are taken into account, even where the individual impact of a proposal may be too minor to trigger concern on its own. This approach enables the identification of effects that may be insignificant in isolation but, when combined with others, could result in a LSE or an adverse effect on site integrity.

Table 5 provides screening for likely significant in-combination effects with the Development.

The following projects, Millennium East and Fiodhag wind farms have been scoped out as the application are in the scoping phase and are not viable planning applications with sufficient detail to assess the potential effect on the SAC.

All operational wind farms hydrologically connected to the River Moriston SAC are also scoped out, as they contribute to the baseline situation against which effects of the Development are to be assessed; this includes the following sites:

- Beinneun;
- Millennium;
- Bhlaraidh; and
- Corrimony.

Table 5: Screening for Likely Significant In combination effects on the River Moriston SAC.

Development	**Potential Cumulative Impacts with the Development**				**In-combination LSE**
	Loss or of habitats	**Disturbance or degradation of habitats**	**Chemical pollution**	**Siltation of watercourses**	
Bunloinn Wind Farm	There would be no direct habitat loss from either development within the River Moriston SAC and therefore no potential for likely significant in-combination effects with the Development.	The EIA Report Chapter 8: Ecology for Bunloinn Wind Farm states a detailed Habitats Regulations Appraisal for the River Moriston SAC is not necessary and therefore is not considered to lead to a likely significant effect.	The EIA Report Chapter 8: Ecology for Bunloinn Wind Farm states a detailed Habitats Regulations Appraisal for the River Moriston SAC is not necessary and therefore is not considered to lead to a likely significant effect.	The EIA Report Chapter 8: Ecology for Bunloinn Wind Farm states a detailed Habitats Regulations Appraisal for the River Moriston SAC is not necessary and therefore is not considered to lead to a likely significant effect.	No likely significant effects
Tomchrasky Wind Farm	There would be no direct habitat loss from either development within the River Moriston SAC and therefore no potential for likely significant in-combination effects with the Development.	Appendix 7-7: Shadow Habitats Regulations Appraisal of the Tomchrasky Wind Farm application does not consider the River Moriston SAC and therefore is not considered to lead to a likely significant effect.	Appendix 7-7: Shadow Habitats Regulations Appraisal of the Tomchrasky Wind Farm application does not consider the River Moriston SAC and therefore is not considered to lead to a likely significant effect.	Appendix 7-7: Shadow Habitats Regulations Appraisal of the Tomchrasky Wind Farm application does not consider the River Moriston SAC and therefore is not considered to lead to a likely significant effect.	No likely significant effects
Bhlaraidh Extension Wind Farm	There would be no direct habitat loss from either development within the River Moriston SAC and therefore no potential for likely significant in-combination effects with the Development.	The EIA Report Chapter 5: Ecology for Bhlaraidh Extension Wind Farm states the Bhlaraidh Extension is unlikely to impact the River Moriston SAC and its qualifying features in the absence of mitigation, and therefore is not considered to lead to a likely significant effect.	The EIA Report Chapter 5: Ecology for Bhlaraidh Extension Wind Farm states the Bhlaraidh Extension is unlikely to impact the River Moriston SAC and its qualifying features in the absence of mitigation, and therefore is not considered to lead to a likely significant effect.	The EIA Report Chapter 5: Ecology for Bhlaraidh Extension Wind Farm states the Bhlaraidh Extension is unlikely to impact the River Moriston SAC and its qualifying features in the absence of mitigation, and therefore is not considered to lead to a likely significant effect.	No likely significant effects
Chrathaich Wind Farm	There would be no direct habitat loss from either development within the River Moriston SAC and therefore no potential for likely significant in-combination	The EIA Report Chapter 10: Ecology highlights no significant direct or indirect effects on the River Moriston SAC.	The EIA Report Chapter 10: Ecology highlights no significant direct or indirect effects on the River Moriston SAC.	The EIA Report Chapter 10: Ecology highlights no significant direct or indirect effects on the River Moriston SAC.	No likely significant effects

Development	Potential Cumulative Impacts with the Development				In-combination LSE
	Loss or of habitats	**Disturbance or degradation of habitats**	**Chemical pollution**	**Siltation of watercourses**	
	effects with the Development.	As such, no HRA accompanies the application. Based on the information available, Chrathaich is not considered to lead to a likely significant effect.	As such, no HRA accompanies the application. Based on the information available, Chrathaich is not considered to lead to a likely significant effect.	As such, no HRA accompanies the application. Based on the information available, Chrathaich is not considered to lead to a likely significant effect.	
Loch Liath Wind Farm	There would be no direct habitat loss within the River Moriston SAC from either development and therefore no potential for likely significant in-combination effects with the Development.	The EIA Report Chapter 8: Ecology states effects would not be significant in the absence of mitigation and therefore are no Likely Significant Effects on the River Moriston SAC. As such an appropriate assessment is not required.	The EIA Report Chapter 8: Ecology states effects would not be significant in the absence of mitigation and therefore are no Likely Significant Effects on the River Moriston SAC. As such an appropriate assessment is not required.	The EIA Report Chapter 8: Ecology states effects would not be significant in the absence of mitigation and therefore are no Likely Significant Effects on the River Moriston SAC. As such an appropriate assessment is not required.	No likely significant effects
Millennium East	There would be no direct habitat loss within the River Moriston SAC from either development and therefore no potential for likely significant in-combination effects with the Development.	No HRA accompanies the application. Based on the information available, Millennium East is not considered to lead to a likely significant effect.	No HRA accompanies the application. Based on the information available, Millennium East is not considered to lead to a likely significant effect.	No HRA accompanies the application. Based on the information available, Millennium East is not considered to lead to a likely significant effect.	No likely significant effects

Based on the table above, all other projects that are hydrological connected to the River Moriston SAC in combination with the Development would lead to no likely significant effects.

8 MITIGATION

The oCEMP (provided as EIA Report Technical Appendix A4.1) which sets out specific measures which relate to this Development. The oCEMP describes water management measures to control surface water run-off and drain hardstanding and other structures during the construction and operation of the Development. Good practice will be followed in all aspects of construction, operation and decommissioning, specifically through a Pollution Prevention Plan (PPP). The development will be subject to a Construction Site Licence, for which a site-specific PPP and incident response plan will be detailed by the Construction Contractor. The PPP will be incorporated into the CEMP.

The PPP will set out measures to be employed to avoid or mitigate potential effects for all phases of the Development and will also include an Incident Plan to be followed should a pollution event occur. This plan will be produced following consultation and agreement with SEPA and all appropriate personnel working on the construction site will be trained in its use.

Method statements will also be applied, which will follow the principles laid out in relevant SEPA Pollution Prevention Guidelines.

Measures outlined in the oCEMP comprise good practice methods and works that are established and effective measures to which the Developer will be committed through the development consent.

Measures outlined in the oCEMP will be adopted and incorporated into a detailed CEMP to be agreed with statutory consultees and the planning authority following consent and before the start of construction, and this is expected to be secured through an appropriately worded planning condition.

Although the oCEMP will evolve to take account of consultee feedback and detailed design, there is sufficient confidence in the effectiveness of the measures set out in the oCEMP for them to be treated as part of the Development for the purposes of this assessment. The measures discussed in the oCEMP are inherently part of all wind farm development design and should be treated as embedded mitigation. This approach has received positive comments from consultees for proposing appropriate embedded mitigation on a project specific basis.

A comparable Decommissioning CEMP (DCEMP) will be prepared for the decommissioning stage in advance of decommissioning commencing, and this is anticipated to be secured by planning condition.

An Operational Environmental Management Plan (OEMP) will be developed and agreed with SEPA and THC. This will provide detail on the retained drainage and new drainage design for the Development, soft engineering and measures proposed to reduce surface water run-off rates from areas of hardstanding.

Storage of fuels during operation of the Development will follow good practice guidance and the OEMP will detail the location of fuel storage and location of emergency spill kits.

8.1 BATTERY SAFETY

The Outline Battery Safety Management Plan (BSMP), provided in the EIA Report as TA A14.2, sets out measures to minimise the risk of a fire occurring and minimise the consequences of a fire should it occur. A final BSMP will be prepared prior to commencement of construction of the BESS element of the Development, and this is expected to be secured by a suitably worded planning condition.

8.2 DRAINAGE

The BESS and substation compounds will have a Sustainable Drainage System (SuDS) designed to a 0.5 % AEP plus 42 % climate change event to manage runoff generated from the compound.

This is expected to be secured through a planning condition requiring the detailed design to be submitted and approved by THC prior to construction.

8.3 AVOIDANCE AND CONSTRUCTION METHODS

The requirement for access tracks crossing watercourses has been minimised during the design stage.

Avoidance of areas of deep peat deposits (>3 m) have been established for the turbine laydown areas and proposed infrastructure has been located on shallower peat as far as practicable.

On areas with peat depths are greater than 1 m, floating road is proposed. In a floating road, the weight of the road is supported by the peat beneath as such avoiding the requirement for foundations extending through to the underlying solid stratum. The floating road will be constructed in line with the good practice guidance provided by Scottish Natural Heritage / Forestry Commission Scotland (2010)[2] and Scottish Renewables et al (2019)[3] and would include the use of geogrids and geotextiles (where applicable).

Peat Management, storage and reuse is outlined in the EIA Report Technical Appendix A4.1, oCEMP, as well as in Technical Appendix A12.2, Peat Landslide Hazard and Risk Assessment (Section 4.2), Peat Management During Construction.

No felling is proposed as part of the Development and therefore effects associated with acidification, impediments to flow (brash build up) and increases in run-off rates are reduced accordingly.

8.4 BUFFERS

A buffer distance of 50 m has been established between watercourses shown on the 1:50,000 OS mapping and Development infrastructure (except for necessary track crossings of watercourses), shown in Figure 12.3.

The 50 m buffer zone around watercourses, in conjunction with the measures set out in the oCEMP, will be sufficient to avoid potential effects on the hydrological and hydrogeological resource, as their effectiveness has been demonstrated on several wind farm construction sites for which Raincloud Consulting Ltd (the authors of this HRA) have provided technical advice.

Proposed access tracks have been designed to avoid crossing watercourses, where possible.

9 CONCLUSION

The Development proposals include several activities that have the potential to affect the River Moriston SAC interests; Atlantic salmon and freshwater pearl mussel.

An examination of the main risks which may affect Atlantic salmon and freshwater pearl mussel as a result of the Development led to the conclusion that following appropriate assessment, in the presence of the discussed mitigation, the conservation objectives for the SAC would **not be adversely impacted** by the Proposed Development.

Specifically, proposed construction activities would have no effect on the SAC interest in the long term, including maintaining the following:

- Population of the species, including range of genetic types, as a viable component of the site;
- Distribution of the species within site;
- Distribution and extent of habitats supporting the species;
- Structure, function and supporting processes of habitats supporting the species; and
- No significant disturbance of the species.

[2] Scottish Natural Heritage & Forestry Commission Scotland (2010) Floating Roads on Peat [Online] Available at: https://www.roadex.org/wp-content/uploads/2014/01/FCE-SNH-Floating-Roads-on-Peat-report.pdf [Accessed 26/06/2025].
[3] Scottish Renewables et al (2019) Good Practice during Wind Farm Construction [Online] Available at: https://www.scottishrenewables.com/assets/000/000/453/guidance_-_good_practice_during_wind_farm_construction_original.pdf?1579640559 [Accessed 26/06/2025].

Fish surveys within and closely downstream of the Development Site, within the SAC catchment, identified no freshwater pearl mussel presence. Despite being a relatively large proposal, careful planning of turbine locations, the distance of infrastructure from tributaries of the SAC and carefully designed control and management measures, including best practice, has resulted in effects being assessed as negligible. Therefore, none of the SAC's conservation objectives should be compromised by the Development alone or in combination with other developments.

Overall, therefore, it is reasonable to conclude that the Development will not have an adverse effect on the integrity of the SAC, either alone or in combination with other developments.

10 FIGURES