

## Ashton M (Mark)

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**From:** Planning Dingwall <Planning.Dingwall@sepa.org.uk>  
**Sent:** 07 January 2020 15:47  
**To:** 'Trevor Hunter'  
**Cc:** Ashton M (Mark)  
**Subject:** RE: Kirkan wind farm - SEI and planning conditions  
**Attachments:** Turbine 5 - Fig SEI-4.1 PSRA.JPG; Turbine 5 - Figure 9.1.6 - 18 July 2019.JPG

Good afternoon Mr Hunter,

Thank you for your email and clarification.

As stated in our response of 29 November 2019 (PCS/168495) we welcome that some of our requested measures to minimise impacts on peat have been adopted; however, we are disappointed that the location of Turbines 5 and 7 have not been amended.

**Turbine 5** - The scale of the peat depth map provided (Figure SEI-4.1 PSRA) was labelled in such a way that not all probing points had been labelled and trying to utilise peat depth points as references for whether or not it had been relocated made it appear that the probing point labelled as 96cm deep was off to the left of centre of the turbine location. I have attached the two peat depth maps we had access to for comparison, which makes it clear why we thought this had been moved further to the east. We now understand that this turbine has not been moved into shallower peat.

**Turbine 7** - Turbine 7 is located on peat depths in excess of 2m and was originally identified as one of the turbines contributing most to peat volumes. It is immediately adjacent to areas of shallow peat.

We first objected to the locations of turbines 5 and 7 in our response of 22 May 2019 (PCS/164876); maintaining our objection in our response of 31 July 2019 (PCS/166661); and again maintaining our objection in our most recent response of 29 November 2019 (PCS/168495).

As we have previously stated (PCS/166661) both Scottish Planning Policy and The Highland Council Onshore Wind Energy Supplementary Guidance supports the avoidance of deep peat through siting and design and the minimisation of carbon. With a slight relocation of infrastructure, deep peat can be avoided and minimise impacts on peat. As already stated, a micrositing condition does not guarantee that the turbines will be moved into areas of shallower peat. We therefore **maintain our objection** and ask that these amendments are made, as we have requested since May 2019.

Sincerely,

### Aden McCorkell

Part time Senior/Planning Officer

Planning Service, SEPA, Graesser house, Dingwall Business Park, Dingwall, IV15 9XB

Redacted

Our planning guidance: [www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/)

Please note that my regular work pattern is Monday through Thursday.

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**From:** Trevor Hunter <Trevor.Hunter@coriolis-energy.com>  
**Sent:** 11 December 2019 13:09  
**To:** Planning Dingwall <Planning.Dingwall@sepa.org.uk>; Mark.Ashton@gov.scot  
**Cc:** Joe Somerville <JSomerville@rsk.co.uk>; Mike Kelly <MKelly@rsk.co.uk>; Catherine Isherwood <CIsherwood@rsk.co.uk>  
**Subject:** Kirkan wind farm - SEI and planning conditions

Dear Aden,

**SEPA ref: PCS/168495**

Thank you for your response to our further information submission. We agree with all your suggested planning conditions.

Just to clarify, with regard to our revised layout in the supplementary environmental information report (SEI), I can confirm we have not moved T5 or T7 or their associated infrastructure. We have moved the access tracks and reoriented hardstandings for both T2 and T16 in order to avoid peat slide risk from the suggested floating of the previous road alignments and to reduce anticipated peat excavation volumes, but not the turbine locations themselves.

The changes with respect to estimated peat volumes from both T5 and T7 (10.9% and 5.6% reductions respectively) result from our carrying out more detailed probes around both of these turbines (with now a finer grain of interpolation). These have confirmed we can reduce the volumes of anticipated peat excavation within the 50m micro-siting tolerance which has been applied for. Please see the attached Figure 1 showing all probes plus the 50m micro-siting allowance at higher scale. In reference to your paragraph 2.3, hopefully it is evident that micro-siting into shallower peat here is feasible, and we would happily accept a planning condition to secure this as you suggest.

As a result of changes made and finer grain data, we have reduced the overall total volume of anticipated peat excavation by 9,242m<sup>3</sup> (around 10%). Notwithstanding, it is also important to note that we have identified potential widespread re-use, restoration and enhancement across the site for the whole of the excavated volume. For what it's worth, SNH have also recently approved a third year of 'Peatland Action' funding for similar restoration elsewhere on the Strathvaich Estate, with methods which seem to be having success and being met with approval.

I trust this additional information is sufficient for SEPA to withdraw its objection in relation to Turbine 7.

Thank you again for your engagement. If you have any further queries, please do not hesitate to contact us.

Best regards,

**Trevor Hunter**  
Project Manager  
Coriolis Energy

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