

9<sup>th</sup> July 2018

Our reference: G/P/661694/04/06/03 Rev00

SEPA reference: PCS/159309

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VIA EMAIL

## CONSULTATION WITH SEPA RE: PROPOSED KIRKAN ONSHORE WIND FARM

Dear Cerian,

RSK is currently undertaking the Environmental Impact Assessment (EIA) for the proposed Kirkan onshore wind farm. We are seeking your comments on our proposed approach as detailed below.

Scottish Environment Protection Agency (SEPA) has already provided a formal response to the EIA scoping request for the proposed development (SEPA reference: PCS/159309), commenting on the proposed methodology and approach to assessment as set out within the Scoping Report. The contribution by SEPA to The Highland Council's (THC's) pre-application advice pack (THC Ref: 18/00618/PREAPP) is consistent with the advice in the scoping response.

There are two matters we would like SEPA's further thoughts on, as follows.

### Sharing existing infrastructure

We note section 1.1. of your scoping response said that SEPA "will object unless site access is taken from the existing windfarm access routes or it can be demonstrated that the impact upon the environment would be less from the creation of a new access." We acknowledge this concern, and would be grateful if SEPA could provide more detail about the particular environmental impacts within SEPA's remit (for example groundwater dependent terrestrial ecosystems, waste, pollution of watercourses, amount of aggregate requiring excavation for new access tracks, or peat) that concern you the most in this instance.

That way, we can ensure that the advice we give to our client focuses on the issue(s) that are of greatest concern to SEPA.

## **Borrow pits**

We note that Section 7.2 d) of SEPA's scoping response requests that the following information be submitted for each borrow pit: "A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table."

In our previous experience, geotechnical site investigations of borrow pits (as opposed to for a commercial quarry project) are usually undertaken at the detailed design stage, i.e. after consent for a project is granted, with a non-intrusive approach to borrow pit assessment being undertaken at the pre-consent stage.

Our favoured approach to the identification of potential borrow pit sites at this stage involves examination of: geological mapping, topographical plans, aerial photography and drainage patterns; areas where ground conditions may be problematic; and areas where groundwater dependent wetlands are present and need to be avoided. Any nearby designations relating to geology or geomorphology are identified. We then undertake a site reconnaissance visit to inspect the identified areas of interest relating to borrow pit potential, groundwater dependency and problematic ground conditions, in order to assess site-specific detail. We then prepare a borrow pit assessment that considers the impacts of borrow pit excavations, including rock suitability, dust production, blasting and rock processing, as well as assessing effects on groundwater dependency and water movement patterns with relation to construction activity through wetland areas.

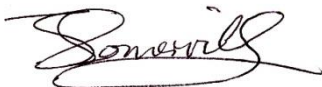
Could you please confirm that this favoured approach would be acceptable in this instance?

If you could let us know your thoughts on these matters, it would be much appreciated.

If you have any queries, please contact me at the address given above or by email ([jsomerville@rsk.co.uk](mailto:jsomerville@rsk.co.uk)).

Yours sincerely,

**For RSK Environment Limited**



Mr Joe Somerville  
Principal Archaeologist

CC: James McKenzie, Energy Consents Unit