Technical Appendix 8.9 Correspondence with Consultees

From: Duncan Saunders To: Aden McCorkell
CC: Robert Beck (RSK), Neil Thomson (Galileo)

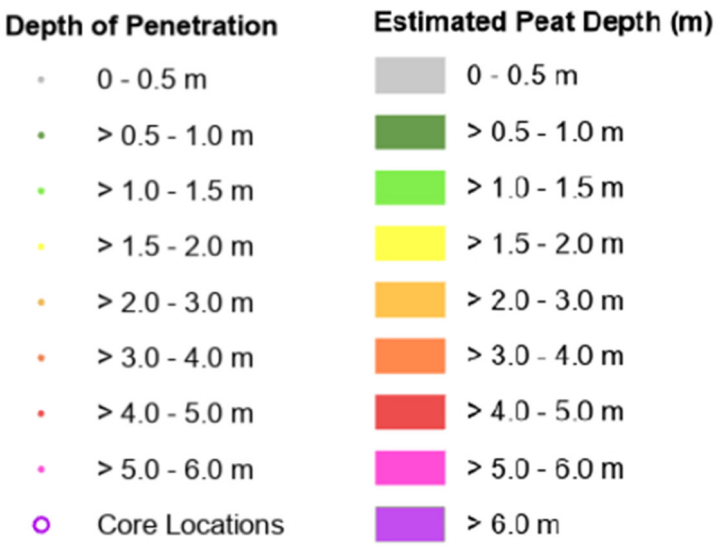
Date: 9th December 2025

RE: LYNMORE WIND FARM – RESPONSE TO SEPA COMMENTS

This commentary relates to the SEPA response PCS-20005446 dated 12 June 2025 to the May 2025 Lynemore S36 Wind Farm planning application and is based on discussions between the Applicant (Galileo 05 Ltd) and their consultants and Aden McCorkell (SEPA) on the 21st October 2025 via MS Teams.

Updated figures (AI Figure 8.8 and 8.9) are attached which show the adjusted layout over the peat probing points and the interpolated peat depth and these should be referred to.

The colour coding on the figure snippets are the same as on Figures 8.8 and 8.9 and as the key below:



SEPA comments are in *italics*.

1.1 Impacts on peat

SEPA Comment: *a) Access track to site – There are sections of track traversing peat in excess of 2 m and not being floated. For example, the section of track between T2 and T8 and T13 and T12/14. The track section from T12/14 to T13 is floated for two thirds of it (both areas closest to the turbines), but not in the middle section which is also on the same depths of peat. The section running north-south from just east of T2 towards the T7/8 junction is a yellow/orange area for ~1.5-3m peat depths and this isn't floated, whereas other tracks in the yellow/orange depths zones are. We realise that slope gradients will play a role; however, there do appear to be more sections that could be considered. Therefore, further information is required to provide an explanation for the methodology followed and further floating track should be considered on peat in excess of 1m depths.*

Fluid Comment

The track layout has been reviewed to identify opportunities for improvement and avoidance of peat where possible. The proposed track has also been assessed to include additional sections of floating track where it is possible.

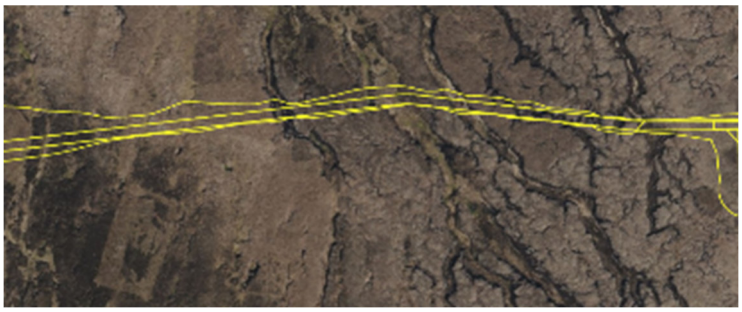
845he section of track between T2 and T8 which totals 845 m has now been removed.

The length of track between Turbine 13 and the junction of Turbine 12 and turbine 14 has now been floated for its entire 800 m length.

Tracks are typically unable to be floated on gradients steeper than 5% which limits the ability to float any further areas of track. Some of the sections where tracks will be excavated are located on heavily eroded peat:

T02 turbine, hardstanding and track crossing numerous deep eroded gullies.

Track at T02



Track between T07 and T08

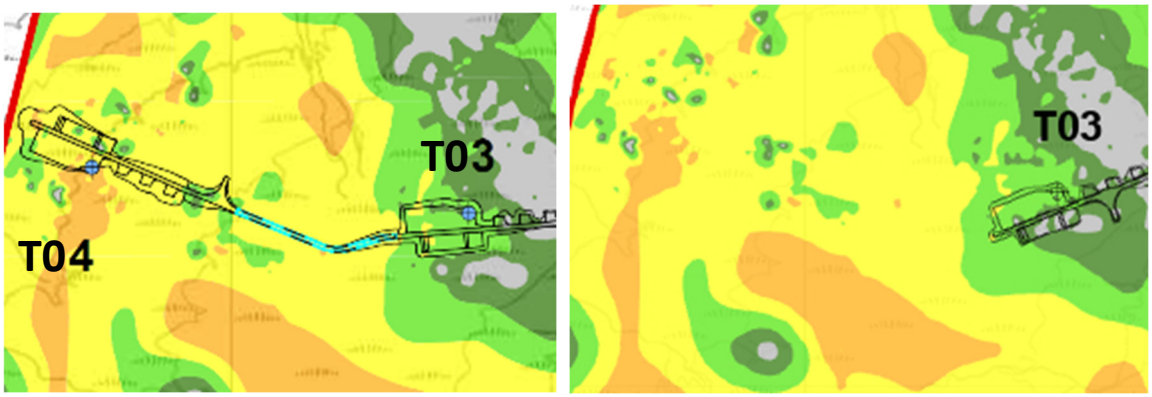
Track between T10 and T11

Track between T09 and T13

SEPA Comment: *b) Turbine 4 – This turbine is on peat depths of 1.5 – 3m and appears to the be the turbine with the greatest contributor to peat excavation volumes (both permanent and temporary). The National Planning Framework 4, Policy 5 d) states "…assessment(s) should inform careful project design and ensure, in accordance with relevant guidance and the mitigation hierarchy, that adverse impacts are first avoided.." This location does not comply with the mitigation hierarchy and based on the peat probing survey for this area, has not sought to lessen its impact. If impacts in this location cannot be avoided or minimised, then this location for a turbine should be reconsidered.*

Fluid Comment

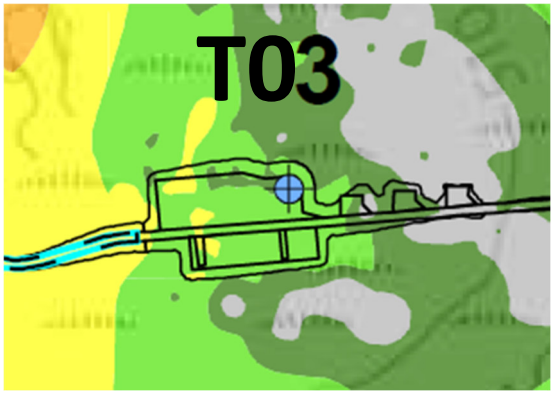
Turbine 04 and the approach track of 560 m from T03 have been removed.



Previous Layout **Updated Layout**

SEPA Comment: *c) Turbine 3 – This turbine is on peat depths of 1-2m. The whole footprint should be shifted east off the yellow (1.5-2m) peat depths and avoiding as much as possible those peat depths over 1m (light green).*

Fluid Comment – Turbine 3 could not be shifted further east due to the steep topography in that direction, which would necessitate a very large area of earthworks. The turbine has therefore been reorientated south east away from 1.5-2m peat depths, supported by additional detailed probing. The current turbine position therefore represents the most suitable balance between minimising peat disturbance and maintaining safe and practical construction conditions. There are substantial restoration opportunities in this area due to the highly eroded nature of the peat.



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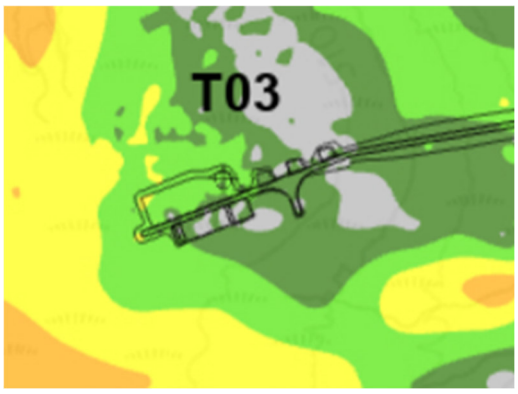

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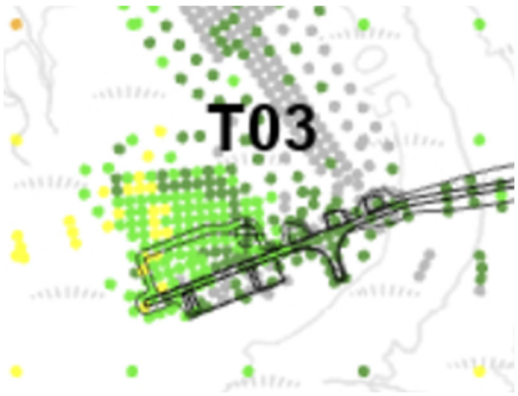

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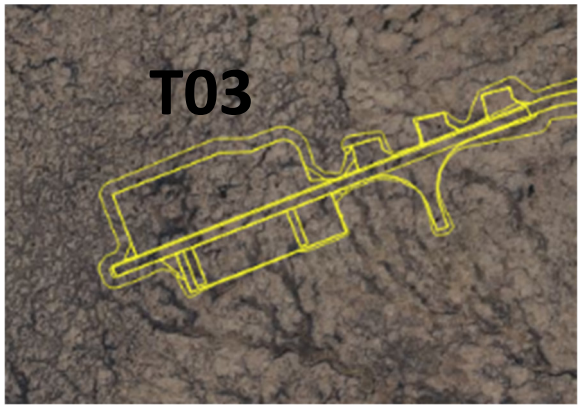

Updated Layout

SEPA Comment: *d) Turbine 2 – This turbine is on a mix of 0.5-3m depths of peat. The turbine location should be relocated onto the dark green (0.5-1m depths) immediately to the north of its current location. This should allow the 2-3m depths of peat on the south east corner of the laydown area to be avoided and overall peat volumes reduced.*

Fluid Comment – Turbine 2 has been relocated further to the northwest as far as possible given the gradient of the slope to reduce peat disturbance. The revised position lies on areas of generally shallower peat, minimising interaction with deeper deposits to the southeast and reducing the overall volume of peat excavation required. It is noted that there is extensive erosion in this area so the hardstanding will act as a support for peat reinstatement in the gullies.

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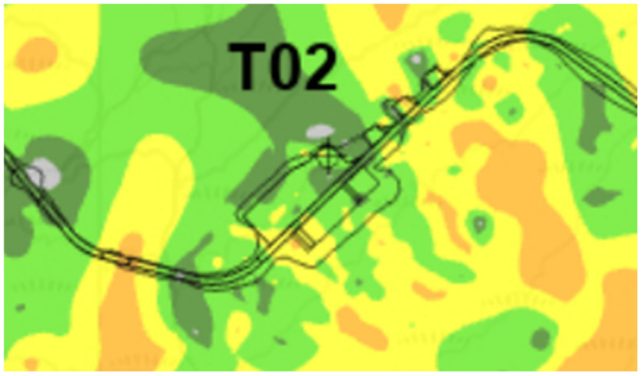

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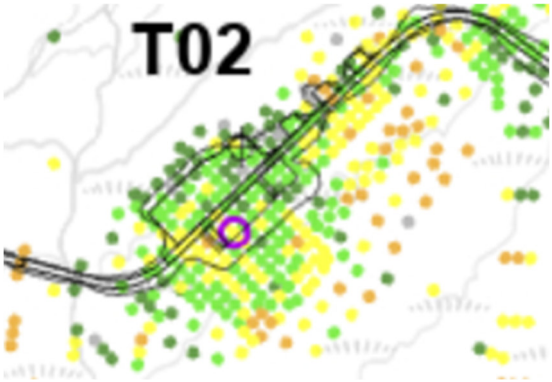

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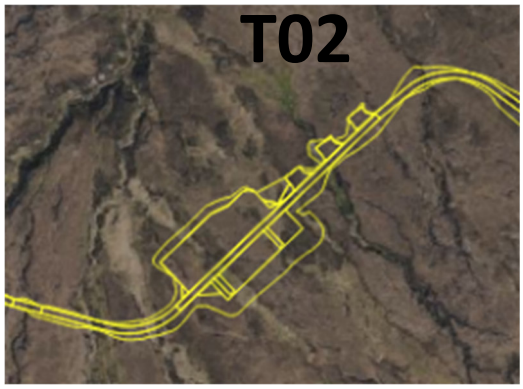
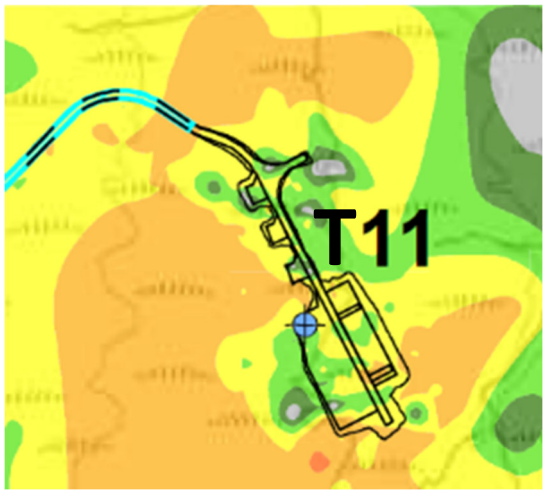


Updated Layout

SEPA Comment: *e) Turbine 11 – This turbine is on peat depths of 1.5 – 3m deep peat. The whole footprint should be shifted northeast off the southern orange edge (2-3m deep areas) and consideration should be given to whether reconfiguring the layout could take the infrastructure also off the western orange edge. There is a large area to the northeastern side of the infrastructure that has not been peat surveyed and this area should be investigated. If this cannot be achieved, then this location for a turbine should be reconsidered.*

Fluid Comment –The turbine has been reorientated, and moved further north which has moved it away from the deeper peat further south. There is still a small section of deeper peat to the west of the turbine, however the orientation is balanced between deeper peat (2-3m) to the north and south. An alternative location to the north east was explored as shown by the probed locations but this only located more peat >2m depth. There are a number of erosion features in this area where peat restoration can also be undertaken.



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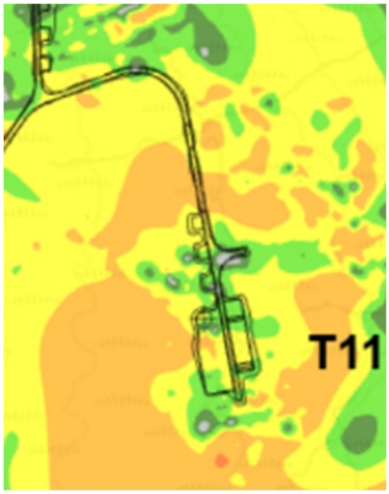

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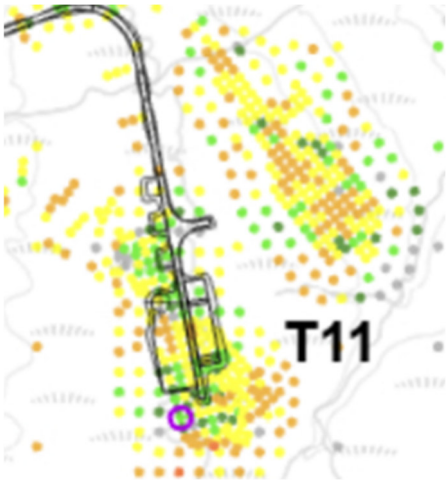

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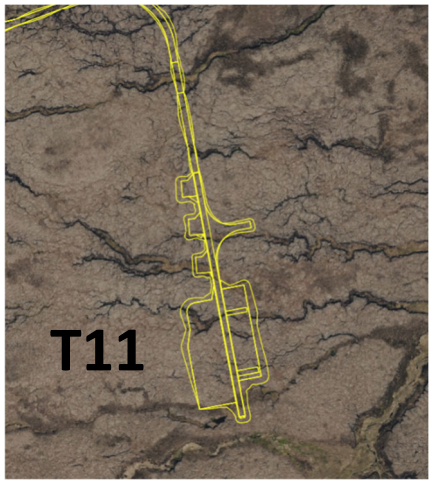
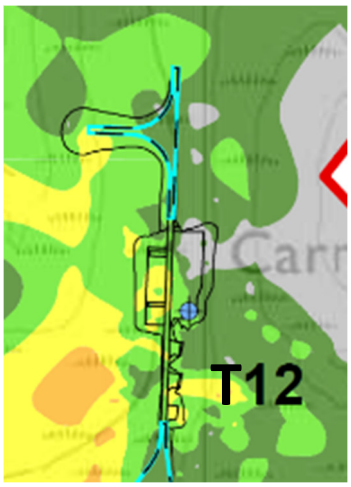


Updated Layout

SEPA Comment: *f) Turbine 12 – This turbine is on peat depths of 0.5-2m. The area immediately to the northeast has been surveyed with very little peat. The whole of the T12 infrastructure should therefore be shifted NE to avoid impacts on all peat over 1m in this location.*

Fluid Comment – Turbine 12 has been relocated eastwards and the turning head has been removed to minimise peat disturbance and avoid areas of deeper peat.



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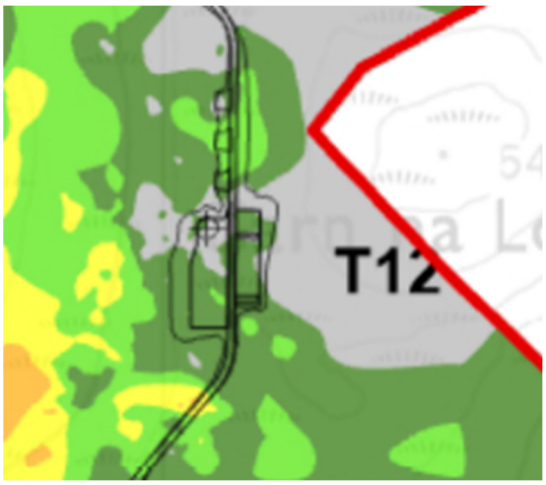

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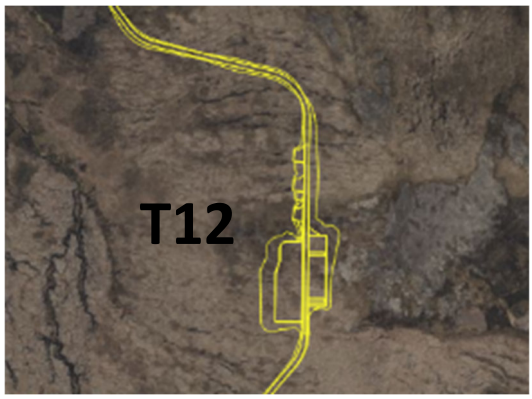
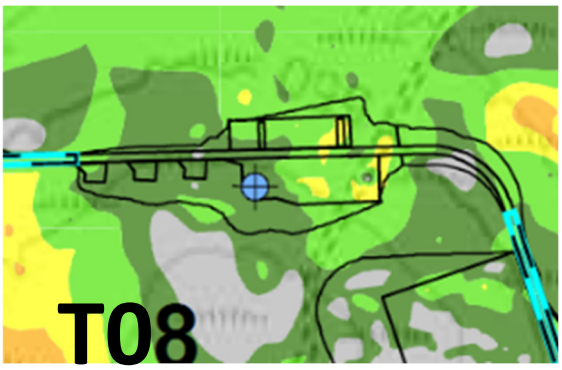


Updated Layout

SEPA Comment: *g) Turbine 8 – While the turbine location for T8 is within 0.5-1m depths, the remaining crane hardstanding to the east is within depths of 0.5-2m. The turbine location could remain the same and the crane hardstanding flipped to the west side. This would avoid impacts on peat depths over 1m.*

Fluid Comment – The crane hardstanding for Turbine 8 has been relocated to the west side of the turbine, as recommended, to avoid areas of deeper peat and minimise peat disturbance.



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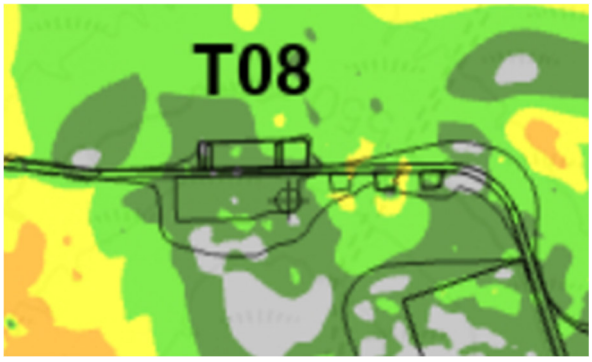

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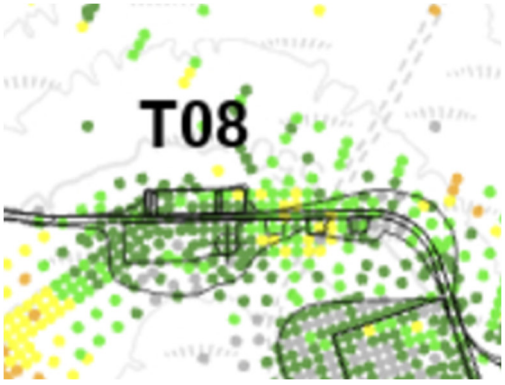

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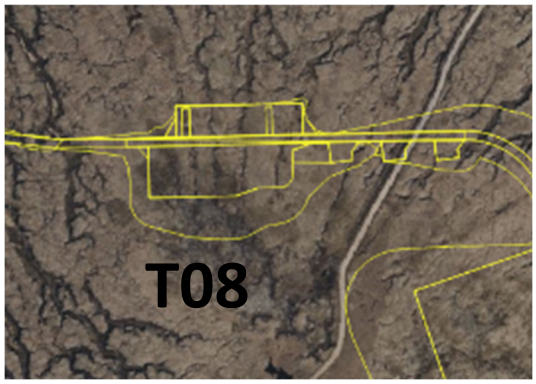
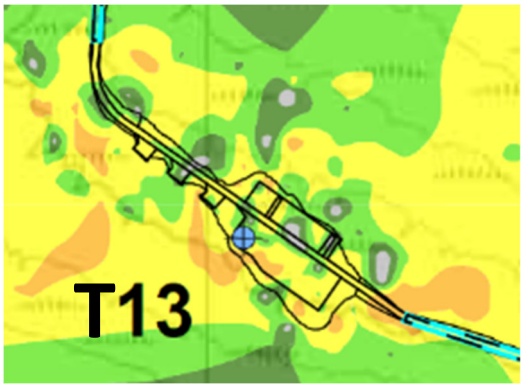


Updated Layout

SEPA Comment: *h) Turbine 13 – This turbine is situated on variable peat depths of 0.5-3m. This location has not demonstrated that it has avoided impacts on peat in the first instance. The infrastructure should be shifted northeast to avoid impacts on the deepest areas of peat (orange 2-3m depths). If this cannot be achieved, then this location for a turbine should be reconsidered.*

Fluid Comment – Turbine 13 has been rotated and relocated north to minimise impacts on the deepest peat areas (2–3 m), reducing potential peat disturbance at the site. This is an area of very high erosion which offers substantial opportunities for peat restoration.



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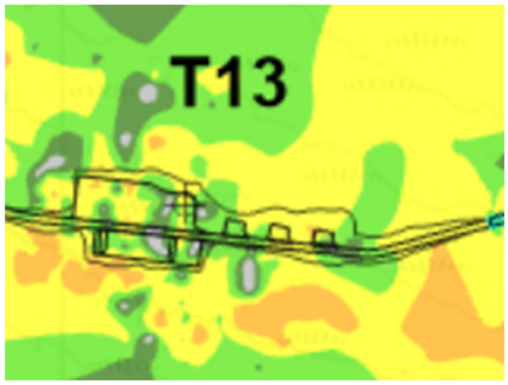

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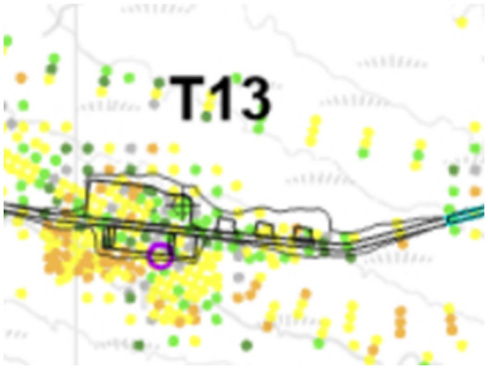

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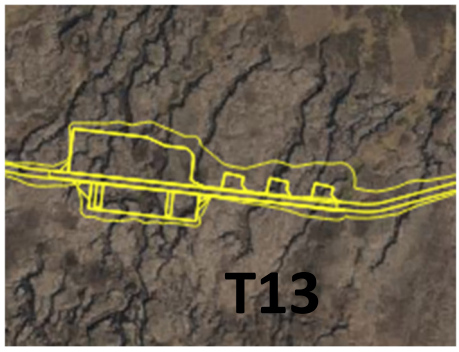
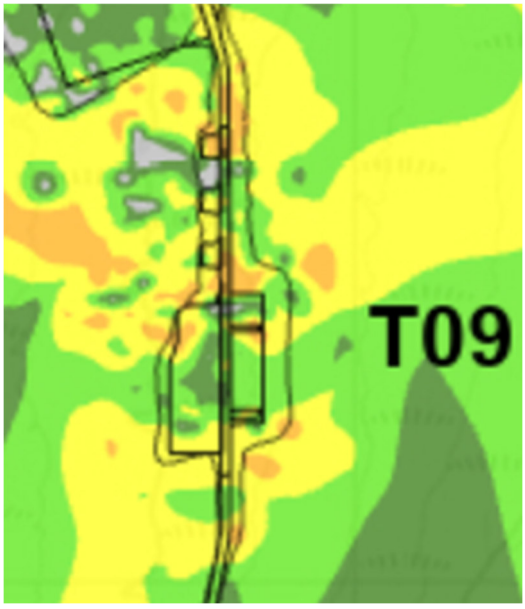
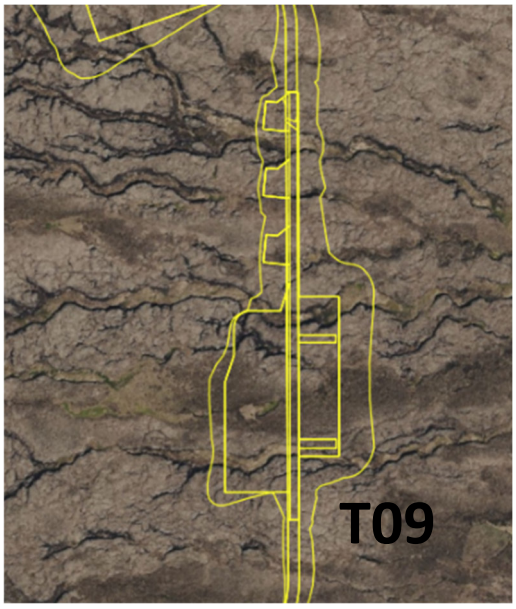


Updated Layout

SEPA Comment: *i) Turbine 9 – This turbine is located on variable peat depths of 0.5 -3m. The turbine itself is located on 2-3m depths of peat. Immediately south of the turbine (within the footprint of the crane hardstanding) are depths of 0-1m. The turbine and associated infrastructure should minimise excavations on depths over 1m and demonstrate avoidance of the deepest areas, such as those over 2m. The layout should therefore be changed to reflect this.*

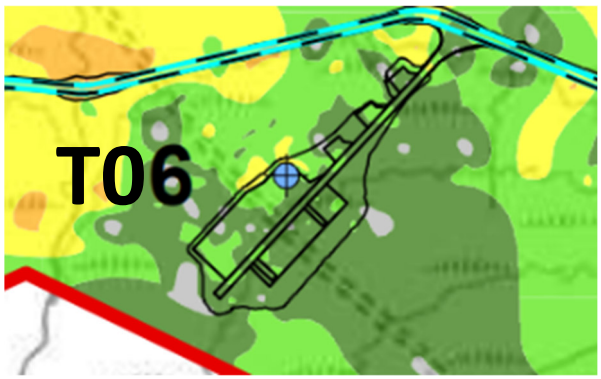
Fluid Comment – Turbine 9 is located within a highly eroded area containing small gullies, which reduces the peat sensitivity of this location due to the reduced carbon sequestration potential (as shown on the aerial imagery). This area presents potential peat restoration opportunities through infill of the gullies. While the peat immediately south of the turbine is more intact, the layout has been designed to minimise disturbance to deeper peat and balance turbine siting requirements with peat management. The eroded nature of this location, combined with the potential for restoration, helps reduce the overall carbon impact compared with more intact peat areas.





SEPA Comment: *j) Turbine 6 – This turbine is located on peat depths of 0.5-2m. The turbine itself is located on the deepest recorded peat depths of 1.5-2m. The whole footprint should be shifted off the deepest areas of peat, avoiding depths over 1m. There looks like an opportunity to shift the infrastructure east and slightly re-position to completely move the footprint off the 1.5-2m depths but also reduce impacts on peat over 1m.*

Fluid Comment – Turbine 6 has been rotated so that a greater proportion of the hardstanding lies on shallower peat to the east. This adjustment minimises disturbance to the deeper peat (1.5–2 m) while maintaining practical construction requirements. The site is highly eroded, so minor infrastructure over the 1 m peat threshold is considered acceptable, and the revised layout represents a positive step in reducing overall peat impact.



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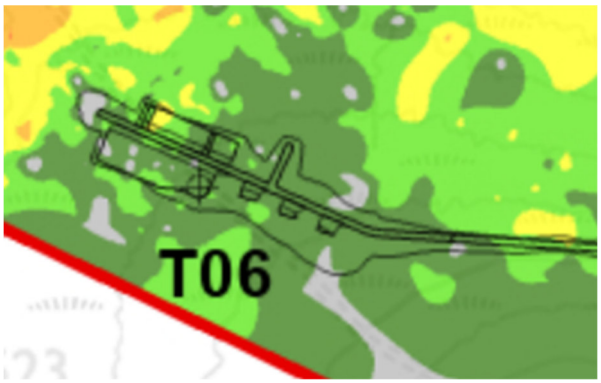

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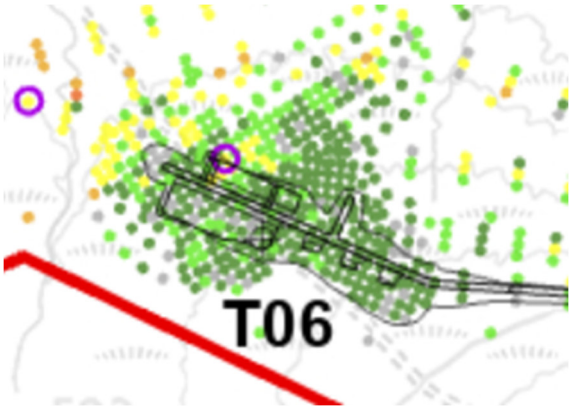

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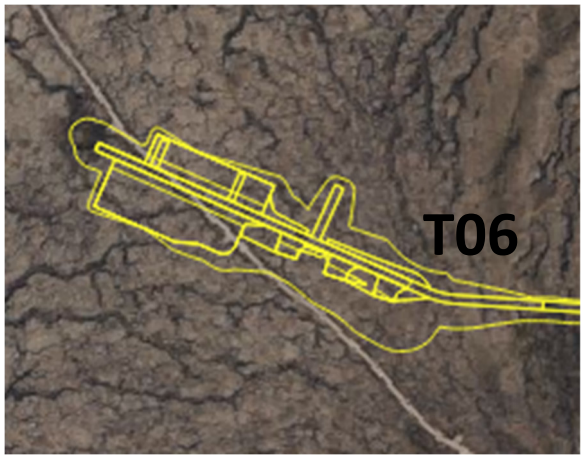
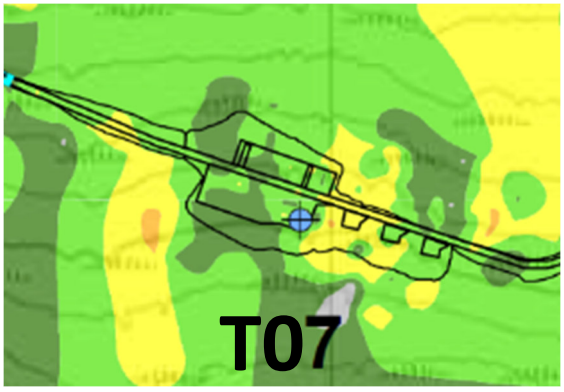


Updated Layout

SEPA Comment: *l) Turbine 7 – This turbine is located on peat depths of 1 – 2m. The turbine should be pulled west off the peat depths of 1.5-2m and consideration given to relocating on the north side of the track where peat depths appear to be less. Consideration should also be given to whether the laydown areas leading up to the crane hardstanding can be floated here.*

Fluid Comment – Turbine 7 has been rotated and moved slightly south to reduce impacts on deeper peat while maintaining practical construction requirements. Moving the turbine or associated infrastructure further west would not significantly improve peat avoidance, as it would remain on similar peat depths and primarily affect temporary areas and track. The site contains several erosional gullies, offering potential restoration opportunities, which have been considered in the layout. Overall, the revised position represents the best balance between minimising peat disturbance and maintaining constructability.



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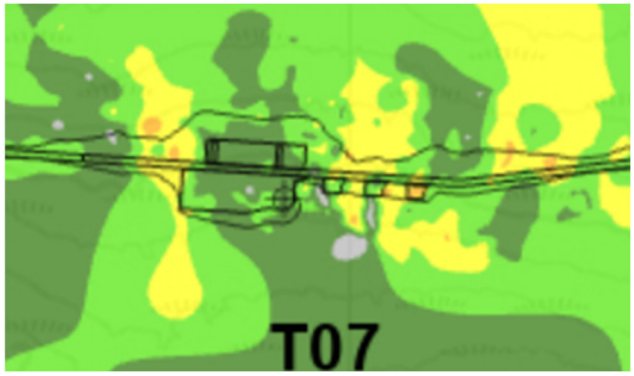

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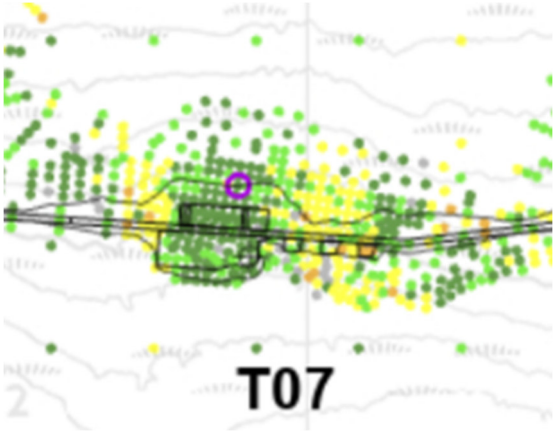

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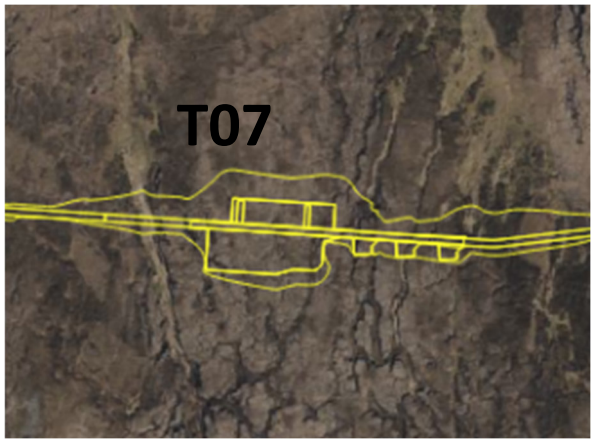

Updated Layout

SEPA Comment: *1.4 Section 8.1 of Appendix 8.3: Outline Peat Management Plan states that catotelmic peat will be used in nearby restoration "through the infill of the gullies with translocated peat…which results in … ~102,000m3 of excavated peat (being).. reused in an extensive peat restoration program as presented in Appendix 6.5 Outline Habitat Enhancement Management Plan." With SEPA no longer providing comment on peatland restoration aspects of the proposal, the applicant should ensure that NatureScot have provided comment on these proposals and that the latest NatureScot peatland restoration guidance is adhered to. We caution that, should NatureScot not approve of the use of this quantity of excavated peat being used in this way, this will result in a large amount of difficult material to utilise on site without a borrow pit to reinstate, and this could result in waste peat, which will need to be regulated by SEPA.*

Fluid Comment – Acknowledged. The Applicant is in consultation with Nature Scot on the methods proposed for peat reuse.

The changes presented above and in the attached figures will be presented in the Further Environmental Information (FEI) report and we trust that they address the concerns on deeper areas of peat that were discussed.

Regards,

Duncan Saunders

Director – Hydrogeologist

Robert Beck

From: McCorkell, Aden [redacted]
Sent: 29 December 2025 14:03
To: Robert Beck
Cc: [redacted] Neil Thomson; [redacted] Duncan Saunders
Subject: RE: Lynemore Wind Farm (ECU00005105) - Response to SEPA holding objection

OFFICIAL

Hi Robert,
Many thanks for addressing the points of our previous response (PCS-20005446) following the meeting on 24 October 2025. I am satisfied that the changes you have attached in the PDF dated 9 December 2025 (by Fluid Environmental Consulting) is sufficient to address our holding objection.

Can we please request a formal consultation from ECU where we will then provide a formal response with requested conditions.

If you have any questions in the meantime, please do not hesitate to get in touch.

Wishing you all a Happy New Year,
Aden

Aden McCorkell
Senior Planning Officer
Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

[redacted]
[redacted]
Graesser House I Fodderty Way I Dingwall I IV15 9XB
Postal address: Angus Smith Building I Unit 6, 4 Parklands Avenue I Holytown I Motherwell I ML1 4WQ

sepa Scottish Environment Protection Agency Buidheann Dìon Àrainneachd na h-Alba
For the future of our environment
+Passionate
✓Professional
↗Purposeful

OFFICIAL