Galileo 05 Limited

Lynemore Wind Farm

Additional Information Volume 2

Chapter 6: Ecology and Biodiversity

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GALILEO EMPOWER

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6 ECOLOGY AND BIODIVERSITY

6.1 Introduction

6.1.0 This Additional Information (AI) chapter presents the findings of an assessment of the likely significant effects on Important Ecological Features (IEFs) associated with the construction, operation and decommissioning of the Revised Proposed Development, comprising a reduction in the total number of turbines to 12 (from the 14 in the EIA Layout), and with some re-location of the retained turbines and their associated internal site access tracks. Refer to **AI Chapter 2: Updated Description of the Proposed Development**, for the detailed description of the revised turbine and infrastructure layout, and to **AI Figure 2.5** which shows a plan of the Revised Proposed Development.

6.1.1 A summary of predicted residual effects upon Ecology based on the EIA Layout was presented in **Table 6.8** of **EIA Report Chapter 6: Ecology and Biodiversity**.

6.1.2 Following the application of standard mitigation, the Ecological Impact Assessment (EcIA) included in **EIA Report Chapter 6** predicted no significant adverse direct and/or indirect effects on ecological features as a result of the EIA Proposed Development, with no greater than Low adverse magnitude and non-significant residual effects predicted for any IEF. An outline Habitat Enhancement and Management Plan (OHEMP) was included as **EIA Report Technical Appendix 6.5** which outlined proposals for extensive restoration of degraded and actively eroding peatland within the Site. This would deliver substantial benefits in the long-term for the viability of this valuable habitat within the Site, and also for a range of protected species within and downstream[1] of the Site including upland breeding waders, otter and fish.

6.1.3 The purpose of this chapter of the AI is to update the EcIA where the level of impact on IEFs may now differ from that originally presented as a result of the design changes. Features for which the redesign is not expected to change the outcome of the previous assessment are 'scoped out' of further consideration in this AI chapter, with justification given. The chapter provides a summary of the findings of the impact assessment for the EIA Proposed Development for ecological features considered potentially 'important' in the context of the Revised Proposed Development, sets out relevant changes to impacts as a result of the Revised Layout, and updates the assessment for the Revised Proposed Development.

6.1.4 The ecology baseline data has been interrogated, and **EIA Report Chapter 6** and associated appendices have been reviewed for information of relevance in the context of the changes to design of the EIA Proposed Development (as described in **AI Chapter 2: Updated Description of the Proposed Development**). This review was undertaken to compare impacts and effects of the EIA Proposed Development with the Revised Proposed Development, and identifies key considerations and any constraints arising from the proposed changes. The outline Habitat Enhancement and Management Plan (OHEMP) has also been updated in the context of the changes, with Revision 2 provided as **AI Technical Appendix 6.5**.

[1] Via prevention of erosion material washing into and silting up watercourses, reducing overall water quality within the catchment both within and downstream of the Site

6.1.5 Methods, results and discussion provided in **EIA Report Chapter 6** are not repeated here, other than where required to inform, or provide context to, the updated assessment presented herein.

6.2 Application Responses to the EIA Proposed Development

6.2.1 Following submission of the EIA Report, a number of application responses have been received to date from interested parties and statutory and non-statutory consultees. While all consultees comments are acknowledged by the Applicant, it is considered that the aspects of all consultation responses that have been received to-date that relate to ecological matters are encompassed within the responses to NatureScot regarding ornithology (see **AI Chapter 7: Ornithology**) and peat restoration proposals (this chapter and **AI Chapter 8: Hydrology, Geology, Hydrogeology and Peat**), and the holding objection from Findhorn District Salmon Fisheries Board (FDSFB). These comments are summarised in **Table 6.1**, alongside a response/clarification, where it is considered useful to aid consultees when deliberating this updated impact assessment for the Revised Proposed Development. Note these comments relate to the EIA Proposed Development which is superseded by the Revised Proposed Development and so is not the subject of this AI Report, and so the table only provides a brief summary of responses. Ongoing consultation with NatureScot on the matter of potential ornithological impacts and with FDSFB on the matter of potential fisheries impacts is ongoing. NatureScot have confirmed that they will give consideration to the matters discussed to-date alongside their consideration of the AI for the Revised Proposed Development.

6.2.2 In summary, issues raised by other parties in relation to ecology matters are not discussed further in this chapter, as it is considered that these matters have been adequately addressed in the context of the EIA and/or in clarifications to statutory consultees, or the Applicant has responded to these matters directly.

Table 6.1: Relevant Consultee Responses to the EIA Report Ecology Chapter

Consultee	Comment	Response/Action Taken
NatureScot (6th August 2025)	NatureScot stated that they are largely in agreement with the assessment of peatland habitat impacts in the EIA Report Chapter 6, and agree that predicted impacts could be offset by adequate peatland restoration. They are also in agreement with the principal of addressing any short-fall in the amount of restoration achieved on-Site with off-Site restoration and stated that detail of these locations should be agreed with Energy Consents Unit.	Noted – detail of any off-Site restoration via a 'Peatland Restoration Agreement' will be agreed with the Energy Consents Unit should the Revised Proposed Development achieve consent.
	NatureScot questioned the total area provided for restoration to compensate for loss of priority peatland habitat and provide further enhancement (372.141ha), and stated that they recommend a minimum of 398.21ha to accord with	The figure given in EIA Report Chapter 6 provided a 1:11 ratio of lost to restored in error, rather than 1:10 plus 10% of the baseline. It should be noted however, that not all of the extent of peatland habitat within the Site can be considered to be priority peatland as per NatureScot

Consultee	Comment	Response/Action Taken
	their guidance in relation to 1:10 ratio of peatland lost to peatland restored, plus an additional 10% of the baseline extent of priority peatland habitat within the Site for enhancement.	guidance (2023), and that the actual baseline extent of *priority* peatland habitat within the Site (i.e. M19 and M17, where not substantially in mosaic with other habitats) is 503.92 ha rather than the 599 ha reported in the EIA Report (which is the total extent of all communities which include blanket bog habitat, including where occurring as one component of a mosaic with other non-bog habitats). The restoration and enhancement totals cited in NatureScot's response are superseded by the assessment of the impacts of the Revised Proposed Development in **Section 6.5** of this AI Chapter, for which losses of blanket bog habitat are reduced due to the removal of two proposed turbines and relocation of other infrastructure. As was the case for the EIA Proposed Development, impact assessment for the Revised Proposed Development has been based on total direct and indirect loss of all blanket bog communities, including mosaics (and so irrespective of likely priority peatland status); associated compensation restoration amounts proposed of 293.39 ha are based on the total permanent direct and indirect loss of all blanket bog habitat communities including mosaics. Also as per the EIA Proposed Development, enhancement restoration proposals have been based on the total extent of all blanket bog communities within the Site irrespective of their likely priority status (599 ha) and as such have been maintained at 59.9 ha, thereby exceeding the enhancement extent required to accord with NatureScot guidance. It is expected that the commitment to restoration of 353.29 ha of peatland for compensation and enhancement will be secured by planning condition.
	NatureScot further commented that they do not support the technique proposed for on-Site compensation, of the restoration of open bare ground and bare gullies.	This is addressed in Chapter 8: Hydrology, Geology, Hydrogeology and Peat
FDSFB (16th June 2025)	FDSFB submitted a holding response in relation to impacts to fisheries not having been included as an IEF for the purposes of EcIA for the EIA Proposed Development, and set out several concerns in relation to fisheries receptors downstream of the Site.	It remains the Applicant's position that, given the low suitability of watercourses within the Site for fish, the spatial separation between the Proposed Development and areas of higher suitability, and the good-practice mitigation embedded within the Proposed Development to protect watercourses and water quality (including a commitment to implement a Fish Monitoring and

Consultee	Comment	Response/Action Taken
		Management Plan (FMMP) secured by planning condition prior to, during and post-construction), there is no impact pathway with the potential to result in significant effects on watercourses or the aquatic features that depend on them. Accordingly, there is no basis for a requirement to assess impacts to fish in the EIA, in accordance with Chartered Institute of Ecology and Environmental Management (CIEEM) guidance (2018) which states that the EcIA should focus on significant effects rather than assessing all effects. A response letter was prepared and issued to FDSFB in December 2025. This provided a detailed response to each of the comments raised by FDSFB to help alleviate any concerns.

6.3 Potential Effects

6.3.1 The change to the design of the EIA Layout comprises the reduction in number and change in locations of some turbines and associated infrastructure (as described in full in **AI Chapter 2: Updated Description of the Proposed Development**).

6.3.2 The baseline ecological data was considered and referred to during the redesign process to avoid increased adverse effects (for example avoiding the highest value areas of blanket bog and bog pools, and maintaining the blade tip stand-off distance to linear features which may be used by foraging bats), thus complying with Step 1 of the Mitigation Hierarchy. Due to other more substantive constraints on placement, T2 is now located 188m (so within 200m plus blade length) from a lone dead birch trunk which was identified as a PRF-I[2] . However, this feature stands alone in a very exposed location, and its potential to provide shelter for bats is only provided by some areas of lifted bark (see Photograph 1 below).

[2] A Potential Roost Feature (PRF) suitable for just one individual bat or very low numbers, indicating low roosting potential

Photograph 1: Dead standing birch with some lifted bark, located at an exposed location (NH 74185 33076); PRF-I. (Also see EIA Report Technical Appendix 6.3, Annex 2, Table A.3, Photograph 6)

6.3.3 This was considered to represent no greater than negligible to low potential to be used on occasion by individual or very low numbers of bats. It is proposed that removal of this feature during the construction phase, following pre-construction presence/absence surveys, will be included in the Species Protection Plans (SPPs) to prevent any risk of it providing a future source of attraction into the turbine area. As such this does not change the conclusions of the impact assessment in **EIA Report Chapter 6** in respect to roosting bats.

6.3.4 The status of any features previously scoped out as IEFs in the context of the EIA Proposed Development is unchanged by the amendments to the design. The assessment of decommissioning effects in **EIA Report Chapter 6** is unchanged for the Revised Proposed Development and so is not repeated in this AI Chapter.

6.3.5 The potential routes to impact, and so to significant effects on IEFs, in the context of the Revised Layout are unchanged in nature from those described in the **EIA Report Chapter 6**, and so this information is not repeated here. The IEFs assessed for the EIA Proposed Development comprised priority habitats in respect to direct and indirect loss during the construction phase, and bats in respect to collision during the operation phase. Following mitigation by design undertaken for the Revised Proposed Development, and the good practice and standard (embedded) mitigation principles committed to in the EIA Report, it is considered that the route to changes to impacts and effect significance for IEFs is restricted to changes in direct and indirect habitat loss extents, and a reduction in potential for collision risk to bats due to the reduction in number of turbines.

6.3.6 The cumulative context of the Revised Proposed Development has also been reviewed for new developments within 10km which have been submitted into planning since the submission of the EIA Report. The cumulative impact assessment (CIA) has been

revisited to account for any changes in cumulative effects that may arise from additional projects within the zone of influence (ZoI) of the Revised Proposed Development.

6.3.7 As such, this chapter considers and assesses the potential for change in the significance of habitat loss and bat collision effects that were reported within **EIA Report Chapter 6** as a result of the changes to layout for the Revised Proposed Development. Potential effects in relation to the construction and operational phases of the Revised Proposed Development are identified as a result of the Proposed Development alone, with cumulative effects with other wind farm developments also considered and discussed as appropriate.

6.4 Methodology

6.4.1 Survey work to establish the baseline conditions in respect to habitats and bats took place in 2023 and 2024. No changes to the land management within the Site have taken place since the EIA Report was submitted, and so it is considered unlikely that there has been any change to the character and extent of the moorland habitats present[3] which would notably change the outcome of the assessment based on the baseline data previously collected. As such, it is considered that the baseline data supporting the EIA Report remains representative of conditions at the Site.

6.4.2 Overall recorded bat activity levels within the Site were very low. Three confirmed species of bats (common and soprano pipistrelle, and brown long-eared bat) were recorded during the activity surveys, with a further genus group (*Myotis* sp.) recorded; in all cases these were considered to relate to either Daubenton's bat or Natterer's bat. Most of the species recorded are common and widespread throughout Scotland and were assigned 'Local' value in the context of the EIA Proposed Development for the purposes of assessment. Common and soprano pipistrelle were the bats most frequently recorded and in the highest numbers.

6.4.3 In accordance with guidance (NatureScot, 2021) impact assessment for the EIA Proposed Development was carried out for the two species considered to be at high risk of collision:

- Common pipistrelle.
- Soprano pipistrelle.

6.4.4 No new guidance has been issued since the submission of the EIA Report in March 2025 that supersedes the assessment rationale followed previously. As such, methods of assessment and assumptions made have followed those presented in **EIA Report Chapter 6** to allow a like-for-like comparison of the effects of the Revised Proposed Development relative to the EIA Proposed Development.

6.4.5 The assessment has included re-running the habitat loss analysis based on the revised infrastructure layout, and (as part of the Site design) conducting a calculation of the stand-off distance to bat features required for the revised turbine locations.

6.4.6 Following the methods, assumptions and rationale presented in the EIA Report, the CIA has been reviewed and updated as relevant to include information relating to bat collision

[3] Principally eroding blanket bog interspersed with dry dwarf shrub heath and flush habitat, and bordered to the north by woodland and commercial conifer plantation

effects from medium- or large-scale wind farm (>3 turbines) development applications within 10km of the Revised Proposed Development, and which have been submitted into planning since the submission of the EIA Report for the EIA Proposed Development.

Limitations

6.4.7 In order to reduce the overall length of track required, and the requirement for crossing areas of deeper peat, the route of access from the A9 has been moved to the southeast (see **AI Chapter 2 Updated Description of the Proposed Development** and **AI Chapter 4 Design Evolution Update**). This change has resulted in *c.* 340 m length at the bottom of the track and a corner of the construction compound being located in an area for which no baseline habitat survey data were collected. However, a review of aerial images and Ordnance Survey (OS) mapping has shown that the unsurveyed area comprises (and so has been assigned as) conifer plantation and as such does not represent an IEF for the purposes of EcIA. It is further noted that some of these areas at the far northern extent of the track will be subject to existing disturbance and further loss due to the A9 dualling works.

6.4.8 It is acknowledged that the age of the data for bats is greater than that recommended by guidance (NatureScot, 2021). However, the National Bat Monitoring Programme (NBMP) 2024 Annual Report (Bat Conservation Trust, 2025) has been reviewed to inform likely overall population trends in Scotland relative to the baseline year (1999) for the key IEFs. This indicates that populations of common and soprano pipistrelle are broadly likely to have remained stable or to show an increasing trend relative to the baseline. As such, and given the likely absence of notable changes to the habitat present, there are unlikely to be substantive changes to the species assemblage or numbers, distribution and activity patterns of bats present within the ZoI of the Revised Proposed Development driven by either habitat or local population changes. It can be concluded that there is unlikely to have been a change to the status of local populations of the key IEF species such that it would have substantially changed activity levels previously recorded, and on which the assessment herein is based. Standard (embedded) mitigation to be implemented would include pre-construction surveys within an appropriate ZoI of the Revised Proposed Development, including searches for potential bat roost features, to update the baseline and inform SPPs.

6.5 Updated Impact Assessment

Habitats

6.5.1 **Table 6.2** details the estimated direct and indirect/temporary losses of blanket bog, dry heath, acid flush, unimproved acid grassland and semi-natural broadleaved woodland as a result of the construction of the Revised Proposed Development. To capture losses relating to habitat communities which occur in mosaic, habitat losses are grouped and assessed by Phase 1 classification with National Vegetation Classification (NVC) information included to provide further context. Habitat losses for the EIA Proposed Development, as presented in **EIA Report Chapter 6**, are shown in italic text. The mosaic composition for the broad IEF habitats in some cases differs from the mosaic composition of the IEF habitats reported in the EIA Report, due to the movement of the infrastructure. As such, some of the mosaics affected previously are no longer affected, and some new

mosaics or habitat communities are affected that were not previously. This is denoted with a "/" in the table, and these differences are considered to be captured under the broad habitat grouping provided, which matches those used in the **EIA Report Chapter 6**.

6.5.2 The impact assessment has been based on the potential total combined direct and indirect loss, with habitats assessed below in order of magnitude of loss (greatest loss, and so greatest impact, assessed first). Unimproved acid-grassland is no longer subject to any loss, and so is not considered further in the EcIA for the Revised Proposed Development.

6.5.3 Habitat losses for all IEF habitats and mosaics containing (and treated as) IEF habitats have decreased for the Revised Proposed Development relative to the EIA Proposed Development (see **Table 6.2**).

Blanket Bog

6.5.4 Blanket bog losses are reduced under the Revised Proposed Development (43.528 ha) compared with the EIA Proposed Development (47.591 ha). As a result, the proportion of the Site's overall blanket bog resource (either occurring alone or as the dominant component of a mosaic) affected by loss is reduced from 8%, as reported in **EIA Report Chapter 6**, to 7%. In contrast to the EIA Proposed Development, all areas of the rarer priority peatland M17a and of M19c blanket bog communities have been avoided completely by the Revised Layout.

6.5.5 Temporary losses[4] account for 14.19 ha of blanket bog loss (compared to 13.76 ha for the EIA Proposed Development) and so following post-construction restoration the total permanent direct and indirect loss of blanket bog to the infrastructure footprint will be 29.339 ha, reducing permanent losses to approximately 4.9% of the total blanket bog resource within the Site, compared to *c.* 5.6% for the EIA Proposed Development. Of this 29.339 ha, only 24.682 ha represents areas of distinct blanket bog habitat (M19a) occurring as a stand-alone community and not in mosaic with heath and flush habitats, and so considered likely to represent priority peatland habitat.

6.5.6 As stated in the **EIA Report Chapter 6**, blanket bog across the Site is characterised by extensive erosional gullies and various modifying influences including grazing pressure from deer (and at lower elevations sheep), evidence of historic burning, self-sown coniferous trees (also more frequent at lower elevations) and artificial drainage at lower elevations close to the transition between blanket bog and dry heath habitats. Only 1.4% of habitats within the Survey Area comprised modified peatland with near-natural features retained, with these found at risk from ongoing erosion.

6.5.7 Taking account of:

- the reduction in loss of blanket bog and blanket bog mosaics.
- the complete avoidance of M17a and M19c.
- the overall highly degraded and modified nature of the blanket bog within the Site.

[4] Additional habitat disturbance within construction working areas and for temporary infrastructure such as construction compounds, which will be reinstated following the cessation of construction works.

6.5.8 the impacts of the Revised Proposed Development are reduced relative to the EIA Proposed Development. The loss of blanket bog associated with the Revised Proposed Development is considered to constitute a permanent impact of medium (reduced from large) adverse magnitude at a Regional scale, resulting in a moderate adverse effect which is significant.

6.5.9 As part of the OHEMP provided with the EIA Proposed Development, the Applicant has committed to compensation for the loss of peatland habitat at a ratio of 1:10 lost to restored, in accordance with NatureScot guidance (2023). As such, for the Revised Proposed Development, 293.39 ha of restoration are required to compensate for the loss, with a further 10% of the extent of priority peatland habitat resource within the Site required for enhancement. The extent of priority peatland habitat (i.e. comprising distinct non-mosaic blanket bog communities of M19a, M19c and M17a) within the Site is 503.92 ha. However, the enhancement proposals of 59.92 ha are based on the total extent of all blanket bog habitat communities (599.24 ha), including where in mosaic with other non-bog habitats, however so a combined total of 353.29 ha. As stated in the OHEMP (**AI Technical Appendix 6.5**), it is expected that 220 ha of restoration will be achieved on-Site via the OHEMP, with the outstanding 133.29 ha to be delivered off-Site via a 'Peatland Restoration Agreement', to be secured through an appropriately worded planning condition.

Dry Dwarf Shrub Heath

6.5.10 No non-mosaic dry dwarf shrub heath habitat would be lost for the Revised Proposed Development. The loss of this habitat type (0.389 ha, compared to 0.527 ha for the EIA Proposed Development) relates solely to dry heath in mosaic with other habitats such as grassland, woodland and bog, which is a common and widespread throughout Highland and Scotland as a whole and does not represent high quality examples of this habitat type. The loss of dry heath associated with the Revised Proposed Development is slightly reduced relative to the EIA Proposed Development, and so still considered to constitute an impact of no greater than low adverse magnitude at a Local scale, resulting in a minor adverse effect which is not significant.

Flush and Spring - Acid/ Neutral

6.5.11 Generally, the flush and spring habitat within the Site comprises species-poor stands of the M6c community dominated by tall rushes and/or associated with peat hags. The Revised Proposed Development scheme will result in losses of 0.484 ha (slightly increased from 0.476 ha for the EIA Proposed Development), comprised of 0.291 ha direct loss and 0.193 ha indirect loss.

6.5.12 Although slightly increased relative to those assessed for the EIA Proposed Development, losses of this habitat are still considered very limited in extent and to constitute a permanent impact of no greater than low adverse magnitude at a Local scale, resulting in a minor adverse effect which is not significant.

Semi-natural Broadleaved Woodland

6.5.13 Losses of habitat within areas mapped as semi-natural broadleaved woodland total 0.010 ha (reduced from 0.025 ha) of which only 0.005 ha is direct loss of habitat supporting

trees. As such overall IEF woodland losses for the Revised Proposed Development are halved relative to the EIA Proposed Development, and are considered minimal in the context of the overall woodland resource within the Site and wider region.

6.5.14 As identified in **EIA Report Chapter 13: Other Issues**, loss of forestry cover will be compensated in accordance with the Control of Woodland Removal Policy, which will include native broadleaved planting as appropriate and as agreed with Scottish Forestry. As such, and taking account of the reduction in loss of this habitat, the overall loss of semi-natural broadleaved woodland associated with the Revised Proposed Development is considered to constitute an impact of negligible adverse magnitude (reduced from Low) at a Local scale, resulting in a negligible adverse effect which is not significant.

Table 6.2: Extent of Habitat Losses for the Revised Proposed Development Compared to the EIA Proposed Development

Habitat Category	Phase 1 Code	NVC Code	EIA Proposed Development Direct Loss (ha)	Revised Proposed Development Direct Loss (ha)	EIA Proposed Development Indirect Loss (ha)	Revised Proposed Development Indirect Loss (ha)	EIA Proposed Development Total Loss (ha)	Revised Proposed Development Total Loss (ha)
Semi-natural broadleaved woodland	B1.2/ A1.1.1	U4a(50%)/ W17(50%)	*0.011*	/	*0.003*	/	*0.025*	0.010
	A1.1.1/E1.6.1/D1.1	W17d(70%)/ M19a(20%)/ H12a(10%)	*0*	/	*0.011*	/		
	A1.1.1	W17d	/	0.005	/	0.005		
Blanket bog	E1.6.1	M17a(70%)/ M19a(30%)	*24.913*	22.226	*19.626*	15.095	*47.591*	43.528
		M19a						
		M19c						
	E1.6.1/ A1.2.2	M19a	*0.059*	/	*0.118*	/		
	E1.6.1/D1.1	M19a(90%)/ H12a/b(10%)	*1.24*	1.967	*0.474*	2.538		
	E1.6.1(75%)/D1.1(25%)	M19a(75%)/ H21a(20%)/ H12a/b(5%)	/	0.439	/	0.363		
	A1.2.2/ E1.6.1	M19a(20%)	*0.419*	/	*0.742*	/		
		M19a(40%)						
	E1.6.1(E2.1)	M19a(M6c)	/	0.263	/	0.638		
Dry dwarf shrub heath	D1.1/B1.1	H12a(70%)/ U4a(30%)	*0.017*	/	*0.009*	/	*0.527*	0.389
	D1.1/ B1.1/ E2.1	H12a(35%)/ H21(35%)/ U4a(10%)/ M6c(20%)	*0.081*	/	*0.009*	/		

Habitat Category	Phase 1 Code	NVC Code	EIA Proposed Development Direct Loss (ha)	Revised Proposed Development Direct Loss (ha)	EIA Proposed Development Indirect Loss (ha)	Revised Proposed Development Indirect Loss (ha)	EIA Proposed Development Total Loss (ha)	Revised Proposed Development Total Loss (ha)
	D1.1/ B1.1/ A2	H12a(60%)/ U4a(35%)/ W19(5%)	*0.046*	/	*0.016*	/		
	D1.1/ A1.1.1	H12a(50%)/ W17d(50%)	*0.09*	/	*0.029*	/		
	D1.1/ A1.1.1/ A2	H12a(85%)/ W17d(10%)/ W19a(5%)	*0*	/	*0.001*	/		
	D1.1/ A1.1.1/ E2.1	H12a(40%)/ W17d(40%)/ M6c(20%)	*0.071*	/	*0.158*	/		
	D1.1(80%)/ E1.6.1(20%)	H21a(80%)/ M19a(20%)	/	0.265	/	0.124		
Flush and spring – acid/ neutral	E2.1	M6c	*0.222*	0.241	*0.136*	0.118	*0.476*	0.484
	E2.1/E1.6.1	M6c(20%)/ M19a(80%)	*0.036*	0.030	*0.082*	0.037		
		M6c(30%)/ M5(10%)/ M19a(60%)						
	E2.1(20%)/ B1.1(20%)/ D1.1(50%)/ E1.6.1(10%)	M6c(20%)/ U4a(20%)/ H21(50%)/ M19a(10%)	/	0.020	/	0.038		
Acid grassland - unimproved	B5/ A2/ B1.1	M23b(95%)/ W19(5%)	*0.06*	/	*0.030*	/	*0.090*	0
Total							***48.709***	**44.411**

Bats

6.5.15 The number of turbines for the Revised Proposed Development (12) is reduced relative to the EIA Proposed Development (14), and stand-off distances to watercourses have been retained in the Revised Layout, so the risk of collision for bats is reduced accordingly.

6.5.16 Standard (embedded) mitigation proposed in the EIA Report to mitigate impacts to bats included horizontal buffers between bat habitat features (watercourses) and turbine bases of 58.92 m, in order to maintain a 50 m stand-off between potential bat features and the rotor blade tips, in line with guidance (NatureScot 2021). All turbines in the Revised Proposed Development are located greater than 100 m from watercourses and so considerably in excess of the minimum requirement. As such, there is no increase to the predicted risk of mortality or injury impacts for populations of bat species and the Revised Proposed Development is not considered to represent a site of concern for bat collision risk following the approach to assessment set out in NatureScot guidance (NatureScot 2021).

6.5.17 Impacts of bat collision risk mortality remain a long-term adverse impact of negligible magnitude at a Local level, resulting in a negligible adverse effect, and which is not significant.

6.6 Cumulative Assessment

6.6.1 It is noted that Kyllachy Wind Farm and Clune Wind Farm have been submitted into planning in the period since the EIA Report for the Proposed Development was submitted. Bats were not assessed as an IEF for Kyllachy Wind Farm, and predicted impacts to bats for Clune Wind Farm were assessed as of negligible magnitude and not significant.

6.6.2 No CIA was carried out for the EIA Proposed Development due to negligible impacts being predicted for bats. The Revised Proposed Development is also assessed as having negligible operational phase impacts with regards to bats, and as such, there will be no detectable increase in effects cumulatively with the predicted effects of any other proposed developments within the 10 km ZoI.

6.7 Summary and Conclusions

6.7.1 There have been no notable changes to habitats present within the Site to indicate changes may be expected to have occurred in local populations of bat species, which may render the baseline used for assessment invalid. As such it is considered that baseline results recorded previously are likely to remain representative of conditions at the Site, and so to be a sufficiently robust basis for updated assessment of impacts in the context of the Revised Layout.

6.7.2 The predicted impacts relating to habitat loss and bat collision risk to IEFs from the EIA Proposed Development have been reviewed in the context of the proposed changes for the Revised Proposed Development. Residual significance for all IEF's is considered to remain not significant, both alone and cumulatively with other proposed developments within 10 km.

6.7.3 The magnitude and significance of residual effects of the EIA Proposed Development for all IEFs of relevance to this AI Report, along with a summary of changes assessed for the Revised Proposed Development and associated updated residual effects are reported in **Table 6.3**.

6.7.4 In summary, the Revised Proposed Development would not give rise to any additional impacts or significant adverse effects, with the magnitude of impacts reduced for blanket bog and semi-natural broad-leaved woodland. The assessment of the Revised Proposed Development does not change the conclusions of the EIA Report and therefore the updated assessment concludes that there would be no significant residual adverse effects upon ecological features, either alone or cumulatively with other projects.

Table 6.3 Summary of Effects

Topic / Receptor	EIA – Significance of Effect / Conclusion	Change	AI – Resulting Significance of Effect	Evaluation
Blanket bog	Large adverse magnitude at a Regional scale. **Moderate** adverse effect. **Significant**. Significant beneficial effects following restoration in accordance with guidance.	Total (direct and indirect) loss of 43.53ha. No M17 or M19c lost. Reduction in loss from 47.59ha for the EIA Proposed Development due to reduced scale and improved locations of infrastructure	Medium adverse magnitude at a Regional scale. **Moderate** adverse effect. **Significant**. Significant beneficial effects following restoration in accordance with guidance.	**Beneficial Reduction**: Overall extent of loss of blanket bog is reduced for the Revised Proposed Development. Thus, adverse effects are reduced for the Revised Proposed Development relative to the EIA Proposed Development and scarcer bog communities are avoided completely. The bog restoration committed to by the Applicant, including enhancement exceeding guidance requirements, is considered to be significant beneficial in EIA terms due to the poor baseline quality and condition of the blanket bog habitat present. This clearly represents a significant enhancement of the habitat at the Site in the context of NPF4.
Dry dwarf shrub heath	Low adverse magnitude at a Local scale. **Minor** adverse effect. **Not significant**.	Total (direct and indirect) loss of 0.389ha. Reduction in loss from 0.527ha for the EIA Proposed Development due to reduced scale of Revised Proposed Development.	Low adverse magnitude at a Local scale. **Minor** adverse effect. **Not significant.**	**Beneficial Reduction**: Overall extent of loss of dry dwarf shrub heath is reduced for the Revised Proposed Development. Thus, adverse effects are reduced for the Revised Proposed Development relative to the EIA Proposed Development and remain minor adverse and not significant.
Flush and spring – acid neutral	Low adverse magnitude at a Local scale. **Minor** adverse effect. **Not significant**.	Total (direct and indirect) loss of 0.484ha. Slight increase in loss from 0.476ha for the EIA Proposed Development due to re-siting of some infrastructure to avoid deep peat, and an overall reduction in floating track extent.	Low adverse magnitude at a Local scale. **Minor** adverse effect. **Not significant**	**Adverse Increase**: Overall extent of loss of acid and neutral flush, and so the adverse effect, is slightly increased for the Revised Proposed Development relative to the EIA Proposed Development. However they remain minor adverse and not significant.
Semi-natural	Low adverse	Total (direct and	Negligible	**Beneficial Reduction**: Overall

Topic / Receptor	EIA – Significance of Effect / Conclusion	Change	AI – Resulting Significance of Effect	Evaluation
broad-leaved woodland	magnitude at a Local scale. **Minor** adverse effect. **Not significant**.	indirect) loss of 0.010ha. Reduction in loss from 0.025ha for the EIA Proposed Development due to re-siting of infrastructure, particularly the main access track.	adverse magnitude at a Local scale. **Negligible** adverse effect. **Not significant.**	extent of loss of semi-natural broad-leaved woodland is halved for the Revised Proposed Development. Thus, adverse effects are reduced to negligible for the Revised Proposed Development relative to the EIA Proposed Development and remain not significant.
Acid grassland - unimproved	Low adverse magnitude at a Local scale. **Minor** adverse effect. **Not significant**.	Due to the change in infrastructure locations for the Revised Layout, no unimproved acid grassland will be lost for the Revised Proposed Development. Reduction in loss from 0.090ha for the EIA Proposed Development.	No effect.	**Beneficial Reduction:** No unimproved acid grassland will be lost for the Revised Proposed Development and so there are no effects on this IEF.
Bat species (operational effects)	Negligible magnitude at a Local scale. **Negligible** adverse effect. **Not significant**.	Fewer turbines. Reduction in collision risk due to reduced scale of the Revised Proposed Development	Negligible magnitude at a Local scale. **Negligible** adverse effect. **Not significant**.	**Unchanged**: It is considered that the baseline conditions recorded at the Site for bats likely remain representative, and that the outcome of the impact assessment for bats is unchanged by the revisions to the EIA Proposed Development.

6.8 Cross Referencing

Table 6.4 Cross reference to EIA

Figures in support of the FEI	Corresponding Figure in EIA Report
AI Figure 6.3a-f	Figure 6.3a-f

6.9 References

Bat Conservation Trust (2025) National Bat Monitoring Programme (NBMP) 2024 Annual Report.

CIEEM (2018, updated 2024) Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

NatureScot (2021). Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation. Joint Publication with NatureScot, Natural England, Natural Resources Wales, RenewableUK, Scottish Power Renewables, Ecotricity Ltd, the University of Exeter and the Bat Conservation Trust (BCT).

NatureScot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management. NatureScot, Inverness.