

RIGGHILL WIND FARM

Environmental Impact Assessment Report –
Supplementary Environmental Information 2

July 2021



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Abbreviations

CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
HGV	Heavy Good Vehicle
HMP	Habitat Management Plan
i.e.	Id est – in other word
LDP	Local Development Plan
LNCS	Local Nature Conservation Site
LVIA	Landscape and Visual Impact Assessment
m	metre
NAC	North Ayrshire Council
PRA	Preliminary Roost Assessment
SEI	Supplementary Environmental Information
SSSI	Site of Special Scientific Interest

1 Introduction

1.1 Background & Purpose of this Supplementary Environmental Information (SEI) Report

- 1.1.1 Rigghill Wind Farm Limited is a joint venture between Burcote Wind Limited and ERG (hereafter referred to as “the Appellant”). In March 2020, the Appellant submitted an application to North Ayrshire Council (NAC) under the Town and Country Planning (Scotland) Act 1997 (as amended). The application was supported by an Environmental Impact Assessment Report (EIAR) as prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (hereafter referred to as ‘the EIA Regulations’). The EIAR submitted as part of the March 2020 application is hereafter referred to as ‘the 2020 EIAR’ (Rigghill Wind Farm Limited, 2020).
- 1.1.2 Subsequent to the production of the 2020 EIAR, feedback was received from various statutory and non-statutory consultees and stakeholders. A number of consultees asked for Supplementary Environmental Information (SEI) to be provided.
- 1.1.3 A SEI Report was therefore produced and submitted to NAC in September 2020, providing supplementary environmental information on a number of specific topics, to address statutory consultees’ comments/concerns. The SEI Report submitted in September 2020 is hereafter referred to as ‘SEI 2020’ (Rigghill Wind Farm Limited, 2021).
- 1.1.4 The planning application was refused at Committee on 29 March 2021. Six reasons for refusal were recorded in the Decision Notice issued and dated 12 April 2021, of which reasons for refusal No.3 and No. 4 are noted below:
- “3. There is insufficient information relating to required works to the local road network. Therefore, the development gives rise to potential road safety concerns. The proposal is therefore contrary to Strategic Policy 2 of the LDP.*
- “4. There is insufficient information relating to required works to the local road network. Therefore, the development gives rise to the potential unacceptable loss of trees and hedgerows, including within the Knock Castle and Routenburn LNCS. This loss could have an adverse impact on the integrity of the Knock Castle and Routenburn LNCS and there are no social, environmental, or economic benefits of local importance which outweigh this. The proposal is therefore contrary to Policy 16 and Policy 18 of the LDP.”*
- 1.1.5 The Appellant proposes to submit an appeal to Scottish Ministers against the refusal of planning permission, under Section 47 of the Town and Country Planning (Scotland) Act 1997 (as amended). This SEI 2 (2021) provides supplementary information in respect of the required works to the local road network, in response to the above reasons for refusal No.3 and No.4, which state that NAC considered insufficient information had been provided.
- 1.1.6 This SEI 2 (2021) is structured as follows, with the information in the following chapters specifically relating relation to potential safety and environmental effects of offsite road works, as referenced in NAC’s reasons for refusal No.3 and No. 4 as noted above:
- Chapter 2 – Traffic and Transport;
 - Chapter 3 – Ecology and Nature Conservation;
 - Chapter 4 – Landscape.
- 1.1.7 This SEI 2 (2021) should be read in conjunction with the 2020 EIAR and the SEI 2020.

1.2 The Proposed Development

1.2.1 The Proposed Development remains unchanged as described in Chapter 3 of the 2020 EIAR.

1.2.2 The works required to the local road network relate to off-site works for widening and improving the proposed access route from the A78 to the Proposed Development access junction. Any such work would be outside the planning application boundary of the Proposed Development.

1.3 The SEI 2 (2021) Team

1.3.1 This SEI 2 (2021) has been compiled largely by the same project team members as outlined in the 2020 EIAR and SEI 2020 (refer to section 1.5 of the 2020 EIAR and section 1.3 of the SEI 2020).

1.3.2 The project team members relevant to the technical topics addressed in this SEI 2 (2021) Report are:

- SEI Management and Delivery – Jenny Hazzard of ITP Energised;
- Traffic and Transport – Gordon Buchan of Pell Frischmann;
- Ecology and Nature Conservation – Mikael Forup of ITP Energised; and
- Landscape and Visual – Jo Philips of Optimised Environments (OPEN).

1.4 Availability of the SEI 2 (2021)

1.4.1 Copies of this SEI 2 (2021) are available from:

Rigghill Wind Farm Limited,
15 Furzton Lake,
Shirwell Crescent,
Furzton.
Milton Keynes,
MK4 1GA
Email: Info@burcotewind.com

1.4.2 Electronic copies of this SEI 2 (2021) can be accessed at www.rigghillwindfarm.com

1.4.3 In accordance with good practice during Coronavirus restrictions, we would discourage any request for hard copy documents. Should hard copy documents be required please make the request via www.rigghillwindfarm.com and we will seek to make appropriate arrangements. Hard copies will be charged at the printing cost to us, which is £50.00 or as a USB for £20.00.

1.5 Representations to the Appeal

1.5.1 Any representations to the appeal should be made directly to the Scottish Government Planning and Environmental Appeals Division at: Hadrian House, Callendar Business Park, Callendar Road, Falkirk, FK1 1XR

2 Traffic and Transport

2.1 Introduction

2.1.1 In order to address the points raised by NAC in its reasons for refusal No.3 and No.4, Pell Frischmann has prepared supplementary information as set out in Appendix 2.1 (Supplementary Environmental Information – Transport and Access Matters).

2.1.2 As noted in Appendix 2.1, the site description remains as per the 2020 EIAR and no internal changes are proposed that would provide a significant change to the proposed traffic flows. Access to the

Proposed Development site is to be taken from the A78 at its junction with Routenburn Road. Traffic proceeding to the site will then traverse Routenburn Road and onto a new access track running parallel to Craigmarloch Road. All traffic will be directed to use this route and the new junction will be sized appropriately.

2.2 Supplementary Information

- 2.2.1 To provide a detailed review of the works required to the local road network, a topographical survey of the road network between the A78 junction and the new access junction was undertaken. The proposed Abnormal Inadmissible Loads (AIL) as described in the 2020 EIAR have been assessed on the topographical base plan, with swept path assessment drawings provided in Appendix 2.1.
- 2.2.2 Where mitigation works are required, the extents of over-run and over-sail areas are illustrated on the swept path drawings. These do not differ significantly from the works identified in the 2020 EIAR and clearly illustrate the extents of the works required to access the site for turbine equipment.
- 2.2.3 In addition to areas where the swept path of the AIL vehicles move outwith the current road widths, an indicative road widening to 4.5m has been shown. The widening to 4.5m complies with turbine delivery standards from the manufacturers.
- 2.2.4 Appendix 2.1 also provides information on general road improvement works, setting out options for road widening works and laybys to be either permanent or temporary features. The type and standard for the road improvement works can be agreed post-consent by appropriate means.
- 2.2.5 Vegetation and trees within the limits of road adoption, i.e. those between the boundary fences, are subject to regular roads maintenance, hedge trimming and vegetation trimming required to keep the public road in a safe condition for all road users. Vegetation trimming works along the local road network will be similar (in places) to many of these regular maintenance works. Where third party trees overhang the public road, NAC has powers under the Roads (Scotland) Act 1984 to either trim vegetation or place enforcement on third parties to cut back vegetation.
- 2.2.6 Information on general construction traffic, access junctions, timing of road improvement works, and road condition, and outline information to be set out in a Construction Traffic Management Plan (CTMP), are set out in Appendix 2.1.

2.3 Assessment of Residual Effects

- 2.3.1 The works described in the drawings within Appendix 2.1 describe a similar extent of works as that already assessed and presented in the 2020 EIAR and SEI 2020.
- 2.3.2 The assessment of potential effects, the committed mitigation measures, and the assessment of residual effects are the same as that presented in Chapter 11 of the 2020 EIAR. No significant effects are predicted. No cumulative effects are predicted.

3 Ecology & Nature Conservation

3.1 Introduction

- 3.1.1 In order to address the points raised by NAC in its reason for refusal No.4, ITP Energised has prepared supplementary information as set out in Appendix 3.1 (Supplementary Environmental Information – Ecology and Nature Conservation).
- 3.1.2 Specifically, information is provided in respect of potential effects on ecology and nature conservation receptors which may arise from the works required to the c.5km stretch of road between Buchanan Street, Largs, and Barr Farm Road end, Skelmorlie. It should be noted that this area is not within the planning application boundary for the proposed Riggill Wind Farm, rather it is a proposed access route for abnormal loads and construction traffic, where it has been identified

that road improvement and widening works will be required. The works that would be carried out on this stretch of road would be to facilitate abnormal load deliveries, prior to commencement of development.

3.2 Supplementary Information

- 3.2.1 To provide a detailed assessment of potential effects review of the works required to above-noted road, an ecological walkover survey of the road and a 50m buffer area, including Preliminary (bat) Roost Assessment (PRA), was undertaken on the 14th June 2021. The survey was undertaken by ITP Energised ecologists, specifically Senior Ecologist Natalie Hooton and Ecologist Alexandra Gow, both of whom are members of the Chartered Institute of Ecology and Environmental Management (CIEEM), in accordance with best practice ecological guidance. Further information on the survey methodology, and the findings of the survey, are presented in Appendix 3.1.
- 3.2.2 The survey identified that woodlands within the survey area comprise ash, sycamore, beech and hawthorn, horse chestnut. The majority of the woodland within the survey area is part of the Knock Castle and Routenburn LNCS. Although the trees within the woodlands for which the LNCS is designated are mature and in good condition, the presence of invasive rhododendron and Japanese knotweed reduces the species diversity and value of the woodlands as a whole.
- 3.2.3 Hedgerows are also present within the survey area (ranging from species-poor to species-rich), and several watercourses flow beneath the access road. Japanese knotweed was identified in two areas.
- 3.2.4 All woodlands within the survey area were identified as likely to offer a range of potential roosting features for bats. Additionally, evidence of otter and badger presence was recorded. Suitable habitats for commuting and foraging for otter, badger and water vole were identified. The habitats within the survey area are also likely to support a range of nesting and foraging bird species.
- 3.2.5 By analysing the extent of the required works, as set out in Appendix 2.1 to this report, the potential effects on ecology and nature conservation receptors have been predicted. Appropriate mitigation has been stipulated, and residual effects taking account of committed mitigation have been assessed.
- 3.2.6 Based on analysis of the required road widening and improvement works as set out in Appendix 2.1, it has been determined that the majority of the vegetation loss will be of rough grassland and scrub growing along the roadside verges. There will also be trimming of hedges to within adoption extents (i.e. the extent to which they are trimmed as part of road safety measures). It is estimated that 22 trees within the LNCS will be felled, of which approximately 13 are immature beech trees which are collectively considered to comprise an unmanaged beech hedgerow. This is estimated to make up an area of c.800 m² of the c.441,300 m² LNCS area, or 0.18%.

3.3 Assessment of Residual Effects

Knock Castle and Routenburn LNCS

- 3.3.1 As the LNCS is designated for its woodland, it is considered the removal of any trees from the LNCS to facilitate any road widening works has the potential to be an adverse effect. However, as stated above, the presence of invasive/non-native species reduces the ecological value of the woodlands, with notably the dense rhododendron likely to reduce woodland regeneration. Overall, therefore, the removal of the small number of trees across a roadside zone, representing an estimated 0.18% of the LNCS area, is not considered to be a significant adverse effect on the integrity of the LNCS.
- 3.3.2 Given that no significant effects are anticipated on the Knock Castle and Routenburn LNCS as a result of the road improvement works, no mitigation is considered to be required. However, the Appellant is committed to compensatory planting of trees in order to compensate loss via construction. It is suggested that, as the trees lost will be on the outer extents of woodland blocks within the LNCS, compensatory planting is undertaken within Skelmorlie Glen Site of Special Scientific Interest (SSSI), which is within the Rigg Hill Wind Farm site and is assessed as being in 'unfavourable declining' condition. The aim of this planting will be to provide enhanced connectivity

either within the SSSI itself or to provide enhanced green corridors in the wider landscape. The Appellant is open to discussing other ideas that may be of more value to local biodiversity, as required. The exact details of compensatory planting will be set out within the Habitat Management Plan as a planning condition in the event the application is consented.

3.3.3 During construction, tree root protection zones may be required according to BS 5837 (2012): Trees in Relation to Design, Demolition and Construction.

3.3.4 No significant adverse residual effects are therefore predicted, and taking account of proposed compensatory planting, there is potential for a net benefit to biodiversity.

Habitats and Species Outside Nature Conservation Designations

3.3.5 It is very unlikely that the road upgrade works will have a significant effect on other habitats which are conservation priorities.

3.3.6 It is also very unlikely that the road upgrade works will have a significant effect on habitats which may support protected or otherwise notable species. Commuting and foraging bats, otter, water vole and badger are likely to be present in the local area and may use habitat features within the survey area. However, local populations are not likely to be significantly affected by the proposed road upgrade works. As required by law, pre-construction survey will be undertaken.

4 Landscape

4.1 Introduction

4.1.1 In order to address the points raised by NAC in its reason for refusal No.4, Optimised Environments has prepared supplementary information on landscape and visual effects associated with the required works to accommodate abnormal loads and construction traffic, as described in Section 2 and Appendix 2.1.

4.2 Supplementary Information

4.2.1 Routenburn Road ascends onto the coastal slopes from the raised beach coastline where Largs is situated. It follows a parallel north-south route to that of the A78 coastal road and generally follows the contours, albeit with some sections of ascent and descent between river courses and higher ground. The character along the road is typically rural, with the predominant land use being agricultural. Enclosed fields of improved pasture cover much of the surrounding landscape with some areas of rougher grazing occurring across the higher ground. There is also fairly extensive woodland cover across these coastal slopes, with mature and deciduous roadside planting enclosing the road, especially along its northern section. While a number of farmsteads and other rural properties sit close to the road, others are recessed and often enclosed by well-established tree cover.

4.2.2 The potential impacts on landscape character and visual amenity relate principally to the loss of vegetation. Appendix 2.1 highlights that the majority of the losses will be of rough grasses growing along the roadside verges. There will also be the removal of an approximate 100m length of hedgerow and trimming of some sections of retained hedgerows to within adoption extents. The effect of these losses will be limited owing to the small quantities that will be removed, their relative abundance in the wider landscape and their ability to recolonise relatively easily and rapidly. The loss of trees will have a more notable effect owing typically to their scale and the sense of enclosure they create. Appendix 2.1 shows that tree removals will be required, comprising 22 trees in total. Approximately 13 of these trees are immature beech trees forming an unmanaged beech hedgerow, and, therefore, their smaller scale and contained form means that the loss will be more akin to that of other sections of hedgerow. In respect of the other nine trees, their removal will occur across very limited extents and from a very small proportion of the substantial tree cover that occurs along

Routenburn Road (approximately 0.18% of the LNCS area). The effect of the tree losses would be moderated by the extent of wider tree cover in these areas.

4.2.3 In terms of the potential impacts that the road widening measures would have on the landscape character and visual amenity of this area, these would be limited for the following reasons:

- Firstly, there is an existing road with an existing influence on the landscape character and visual amenity of this area. There is no new feature being introduced, only an increase in the extent of the Routenburn Road as an existing feature.
- Secondly, the road widening measures are relatively small in scale and extent, with only specific sections being widened and a total of seven passing places being added. Furthermore, the extent of widening has been kept to a minimum and only introduced where necessary.
- Thirdly, roads as surface features have much less of an impact than other developments with a much greater vertical dimension. While they can have a notable impact on landscape character and visual amenity, this typically arises either where they are introducing a new feature into a largely undeveloped landscape or where road widenings are on a large scale and over wider extents. In respect of Routenburn Road, as described previously, the scale and extent of the changes will be limited and, furthermore, the extent of tree cover along this road would limit the extent to which the changes will be visible, owing to the screening effect these trees provide.

4.3 Assessment of Residual Effects

4.3.1 In summary, while the road-widening measures would have some effect on the local landscape character and visual amenity of this area, these effects would be limited by the relatively small scale and extent of the works to an existing road, the limited number of trees that would be lost and the screening effect of the more substantial woodland cover that occurs across these coastal slopes.

4.3.2 No significant effects are predicted on the local landscape character and visual amenity of the area, as a result of the road improvement works. Therefore, no specific mitigation is required and no significant residual effects are predicted.

5 Conclusion

5.1.1 This SEI 2021 provides supplementary information in response to NAC's reasons for refusal No.3 and No.4, specifically information on the anticipated works required to widen and improve the proposed access route to Riggill Wind Farm along Routenburn Road, and the associated effects on the local transport network, ecology and nature conservation receptors, and landscape and visual resource.

5.1.2 This SEI 2021 identifies no potential significant environmental effects resulting from the proposed works. However, committed mitigation, compensatory and good practice measures are summarised below.

- Compensatory planting of trees will be undertaken within Skelmorlie Glen SSSI, to provide enhanced connectivity either within the SSSI itself or to provide enhanced green corridors in the wider landscape.
- Tree root protection zones will be observed during construction as may be required according to BS 5837 (2012): Trees in Relation to Design, Demolition and Construction.
- As required by law, pre-construction protected species survey will be undertaken.

5.1.3 Following implementation of these measures, the works are not anticipated to give rise to any significant adverse residual effects, and there is potential for a net benefit to biodiversity.

6 References

British Standards Institution (2012). *BS 5837 (2012): Trees in Relation to Design, Demolition and Construction* .

Riggill Wind Farm Limited (2020). *Riggill Wind Farm Environmental Impact Assessment Report 2020*.

Riggill Wind Farm Limited (2020). *Riggill Wind Farm Environmental Impact Assessment Report – Supplementary Environmental Information September 2020*.

Scottish Government (2017). Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended). Available at:

<http://www.legislation.gov.uk/ssi/2017/102/contents/made>