



Torfichen Wind Farm

Post Submission - Additional Information 2 Report

October 2025

Author	Renewable Energy Systems (RES) Ltd
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Contents

1	Introduction	4
1.1	Background	4
1.2	Purpose of this Additional Information 2 Report.....	4
1.3	Availability of the AI 2 Report	4
1.4	Representation to the AI 2 Report	5
2	Responses to Comments Received	6
2.1	Responses to the March 2025 AI Report	6
2.2	Responses to Comments on the March 2025 AI Report.....	6
3	Additional Information	10
3.1	Landscape and Visual	10
3.2	Archaeology and Cultural Heritage	11
3.3	Ornithology	11
3.4	Ecology.....	12
	Appendix 1 - Updated LVIA Report	13
	Appendix 2 - Comparative ZTV (Blade Tip)	14
	Appendix 3 - Comparative ZTV (Hub Height)	15
	Appendix 4 - LVIA Wireline Visualisations	16
	Appendix 5 - LVIA Residential Properties Plan.....	17
	Appendix 6 - LVIA Residential Properties Wirelines.....	18
	Appendix 7 - Updated Cultural Heritage Assessment	19
	Appendix 8 - Updated Cultural Heritage Figure 7.1a	20
	Appendix 9 - Updated Cultural Heritage Figure 7.1b	21
	Appendix 10 - Updated Cultural Heritage Figure 7.2	22
	Appendix 11 - Updated Cultural Heritage Figure 7.3	23
	Appendix 12 - Updated Cultural Heritage Wirelines	24
	Appendix 13 - Curlew & Black Grouse Mitigation Note	25

Appendix 14 - Updated OIA Report	26
Appendix 15 - OIA Update Figure 1	27
Appendix 16 - OIA Update Figures 2 - 5.....	28
Appendix 17 - OIA Update Figures 6 - 10	29
Appendix 18 - OIA Update Figures 11 - 15.....	30
Appendix 19 - OIA Update TA 9.5.....	31
Appendix 20 - OIA Update TA 9.6.....	32
Appendix 21 - OIA Update TA 9.7.....	33
Appendix 22 - Ecology Response to Midlothian Council	34
Appendix 23 - Ecology Technical Memo	35

1 Introduction

1.1 Background

Renewable Energy Systems Ltd (RES) (hereinafter referred to as 'the Applicant') has applied to the Scottish Ministers for Section 36 consent and deemed planning permission in terms of the Electricity Act 1989 and the Town and Country Planning (Scotland) Act 1997, to construct and operate Torfichen Wind Farm (hereafter referred to as the 'Proposed Development', at site centre British National Grid 333932 654430.

The application was supported by an Environmental Impact Assessment (EIA) Report as required by The Electricity Works (Environmental Impacts Assessment) (Scotland) Regulations 2017 and submitted to the Scottish Ministers in November 2023 with the application (Reference: ECU00004661).

Following the submission of the Section 36 consent request for the Proposed Development, the Energy Consents Unit (ECU) consulted relevant statutory and non-statutory organisations as well as the public. Following the receipt of consultation responses, an Additional Information (AI) Report was submitted by the Applicant in March 2025 to address comments and holding objections received.

1.2 Purpose of this Additional Information 2 Report

This further Additional Information 2 (AI 2) Report responds to the further consultee comments received to the March 2025 AI Report.

It should be noted that there are no changes to the Proposed Development as outlined within the application.

The information set out in this AI 2 Report is intended to be read in conjunction with the EIA Report and the previous AI Report. Reference will be made to the EIA and AI Report chapters, sections, associated appendices and figures where the original remains applicable. Where any information in the EIA Report is superseded by the information presented in this AI Report, this is made clear.

1.3 Availability of the AI 2 Report

In accordance with part 6 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, hard copies of the AI 2 Report and supporting documents can be viewed at:

Gorebridge Library
98 Hunterfield Road
Gorebridge
EH23 4TT

Hard copies of the AI 2 Report are available by request from:

Torfichen Wind Farm Project Team
Renewable Energy Systems Ltd,
Third Floor STV,
120 Govan Road,
Glasgow,
G51 1PQ

Email: Rebecca.Randall@res-group.com

The pdf files can be downloaded from <http://www.energyconsents/scot/> and www.torfichen-windfarm.co.uk.

1.4 Representation to the AI 2 Report

Any representations to the application should be made directly to the Scottish Government at:

Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Email: representations@gov.scot

Online: <http://www.energyconsents.scot/>

2 Responses to Comments Received

2.1 Responses to the March 2025 AI Report

The responses to the submission of the March 2025 AI Report received from Consultees are summarised in **Table 2.1**.

Table 2.1: Consultation responses

Consultee	Consultation Summary Response
BT	No objection
Coal Authority	No objection
Defence Infrastructure Organisation (MOD)	Objection
Edinburgh Airport	No objection
Fisheries Management Scotland	No objection
Glasgow Airport	No objection
Glasgow Prestwick Airport	No objection
Highlands and Islands Airport	No objection
Historic Environment Scotland	Objection
Howgate Community Council	Objection
JRC	No objection
Midlothian Council	Objection
Moorfoot and Heriot Community Council	Objection
NATS	No objection
NatureScot	Further mitigation measures recommended
RSPB	Objection
Scottish Forestry	No objection
Scottish Water	No objection
ScotWays	No objection (holding objection lifted)
Scottish Environment Protection Agency	No objection
Transport Scotland	No objection

2.2 Responses to Comments on the March 2025 AI Report

Table 2.2 provides a summary of consultee objections, recommendations and comments; and the Applicant's response.

Table 2.2: Responses to consultee objections, recommendations and requests for additional information

Consultee Response to AI Report	Applicant Response
Midlothian Council	
<p><u>Landscape and Visual Impact</u></p> <p>The Council's Landscape Officer remains of the view that proposed turbines T1, T2 and T3 appear as outliers in specific viewpoints. These turbines appear detached from the main group. It is recommended that the applicant considers these turbines for removal from the development.</p>	<p>Appendices 1 - 6 of this Report provides an assessment of the landscape and visual impacts of a scenario where turbines T1, T2 and T3 were removed from the Proposed Development; and further considers whether turbines T1, T2 and T3 appear as outliers.</p> <p>The Applicant's position remains that the landscape and visual impacts of the Proposed Development are acceptable, therefore removal of turbines is not proposed.</p>
<p><u>Cultural Heritage</u></p> <p>As the assessment stands, the proposal does not adequately assess the impacts of the proposals upon the historic environment. The assessments are not adequate and the mitigation strategy proposed is not acceptable. It is recommended that more work is carried out before the Archaeology and Cultural Heritage EIAR chapter could be considered to be of an appropriate standard to review.</p>	<p>SLR Consulting Ltd have liaised directly with the Council's cultural heritage consultant to clarify their requirements for an updated assessment. The updated assessment and supporting figures are found at Appendices 7 - 12 of this Report.</p>
<p><u>Ecology</u></p> <p>The Council suggest that other opportunities closer and more connected to the site are identified for alternative biodiversity enhancement measures instead of Search Area D (of the oBEMP).</p> <p>The Council also query whether the potential for any additional adverse impacts on peat habitats has been considered with the proposed landscape masterplan for the Battery Energy Storage System (BESS).</p> <p>It is recommended that further details of tree/vegetation removal on the AIL route should be provided and scoped into the net loss calculations for the biodiversity net gain calculation.</p>	<p>Midlothian Council's comments in relation to ecology and biodiversity are addressed at Appendix 23 of this Report by the project ecologists SLR Consulting Ltd (formerly MacArthur Green).</p>
Historic Environment Scotland (HES)	
<p>HES object to the Proposed Development following the submission of further visualisations from Arniston House (LB808) and Arniston Inventoried Garden and Designed Landscape (GDL00029) in the AI Report.</p>	<p>The updated cultural heritage assessment at Appendix 7 includes a further response to HES from SLR, which maintains that the overall ability to understand appreciate and experience these assets would not be significantly impacted and asks for the reconsideration of the objection.</p>

Consultee Response to AI Report	Applicant Response
<p>They conclude that the visibility of parts of turbines T1, T2 and T3 in the axial view from principal rooms and garden ground would cause unacceptable adverse impacts on the setting of the assets.</p> <p>HES recommend the removal or relocation of turbines T1, T2 and T3 to remove their objection.</p>	<p>Appendix 7 also provides an assessment of the cultural heritage impacts of a scenario where turbines T1, T2 and T3 were removed from the Proposed Development. The Applicant's position remains that the cultural heritage impacts of the Proposed Development are acceptable, therefore removal of turbines is not proposed.</p>
NatureScot	
<p><u>Ornithology</u></p> <p>In regard to impacts on black grouse, NatureScot recommend the introduction of predator control as mitigation. They also advise that marking turbine bases in a significantly contrasting colour can reduce the risk of collision, as black grouse are more likely to collide with turbine bases than blades. Recommendations are also made for the composition and density of the broadleaf planting proposals contained in the oBEMP.</p> <p>In regard to impacts on curlew, NatureScot recommend that turbine removal or relocation may not be wholly ineffective as mitigation. They also recommend the introduction of predator control as it "would potentially make the single biggest difference to curlew populations, particularly as the introduction of new linear features into a landscape has been shown to improve the efficiency of predator foraging."</p> <p>In the case of both above species, further detail is required in relation to off-site mitigation proposals such as regional monitoring schemes.</p>	<p>Appendix 13 of this Report sets out proposed prescriptions for additional mitigation measures recommended by NatureScot to benefit black grouse and curlew.</p> <p>Appendices 14 - 21 of this Report presents an assessment of the potential ornithology impacts of a scenario where turbines T1, T2 and T3 were removed from the Proposed Development. The Applicant's position remains that the proposed mitigation measures can successfully address the potential ornithology impacts of the Proposed Development, therefore removal of turbines is not proposed.</p>
RSPB	
<p>RSPB maintain their objection based on the cumulative impacts of the development with other consented windfarms on breeding curlew. They also have serious concerns about the potential negative impacts on breeding black grouse and the nationally important "upland moorland and grassland with water bodies" breeding bird assemblage.</p> <p>RSPB recommend the following which may allow them to reconsider their position:</p>	<p>Appendix 13 of this Report sets out proposed prescriptions for the mitigation measures to benefit black grouse and curlew.</p> <p>Appendices 14 – 21 of this Report presents an assessment of the potential ornithology impacts of a scenario where turbines T1, T2 and T3 were removed from the Proposed Development. The Applicant remains of the</p>

Consultee Response to AI Report	Applicant Response
<ul style="list-style-type: none"> • Revisit the proposed mitigation measures aimed at addressing the predicted operational impacts to breeding Curlew on site and through cumulative displacement, which may include the removal or relocation of turbines. • Consideration of on-site and off-site mitigation for potential impacts on breeding Black Grouse. • Include bird monitoring for the duration of wind farm operation, due to potential impacts of ornithology at the site. • Ensure adequate enhancement is delivered in line with NPF4 Policy 3 for key species, e.g. Curlew and other waders. 	<p>position that the proposed mitigation measures can successfully address the potential ornithology impacts, therefore removal of turbines is not proposed.</p>
MOD	
<p>The MOD maintains its objection to the application due to the unacceptable impact on the operation and capability of the array.</p>	<p>The Applicant's position remains the same as that at the application stage and is confident that the impact can be mitigated once the MOD and Scottish Government has agreed on the updated technical 'noise budget' and allocation policy. This mitigation could be secured through an appropriately worded suspensive planning condition.</p>

3 Additional Information

As discussed in **Table 2.2** several additional reports have been produced by the Applicant to respond to objections, recommendations and requests for additional information. This section provides an overview of the additional information which is provided in **Appendices 1 - 23** of this Report.

In response to the recommendation from Midlothian Council's Landscape Officer and Historic Environment Scotland (HES) to remove or relocate turbines T1, T2 and T3; the additional information includes assessments of the impacts of this reduced scheme. It should be noted that this is for information only, and the Applicant is not proposing this change to the Proposed Development.

Due to turbine spacing requirements, there is no scope to relocate turbines beyond the requested micro-siting allowance. Therefore, the assessments examine a reduced scheme for an alternative layout of 15 turbines. This would result in a reduction in yield and energy generation of approximately 16% from the current Proposed Development of 18 turbines. The assessments carried out as part of this Report conclude that there would be no overall change in the significance of effects in EIA terms with the removal of T1, T2 and T3.

3.1 Landscape and Visual

Following Midlothian Council's consultation response, the Applicant has commissioned Pegasus Group to produce an assessment of the landscape and visual impacts in a scenario where turbines T1, T2 and T3 were removed from the Proposed Development. This is included at **Appendices 1 - 6**.

The assessment is supported by comparative Zone of Theoretical Visibility (ZTV) plans and wireline visualisations from selected viewpoints and residential properties illustrating the Proposed Development minus the three turbines.

The assessment also further considers the extent to which turbines T1, T2 and T3 appear as outliers.

It is maintained, as stated in the March 2025 AI Report, that whilst turbines T1, T2 and T3 are located towards the edge of the array in certain views, it is not considered that they form inappropriate outliers to the rest of the turbines, such that further design changes or deletion would be necessary.

It is found that the reduction in landscape and visual effects from removing the three turbines would be relatively limited.

3.2 Archaeology and Cultural Heritage

Following comments received from Midlothian Council and HES, the Applicant commissioned SLR Consulting to update the Archaeology and Cultural Heritage assessment for Torfichen Wind Farm. The updated assessment and supporting documents form **Appendices 7 - 12** of this Report.

The revised assessment provides an updated baseline assessment, with the results of a blanket walkover survey undertaken in August 2025, in order to aid in a more accurate appraisal of the archaeological potential of the site and update the potential for direct impacts on heritage assets. An updated site gazetteer is provided. In relation to Policy ENV24 and Policy ENV25 of Midlothian Council's Local Development Plan (2017), the mitigation measures proposed ensure that the proposal has been sited and designed to minimise damage to known heritage assets.

The updated assessment also readdresses concerns in relation to where potential archaeological remains exist and have ensured their preservation in situ and avoidance as much as possible. Where assets may be adversely affected, suitable mitigation measures are in place to ensure their appropriate recording.

It is maintained that the objection from HES on the impacts on the setting of Arniston House and Arniston Inventory Garden and Designated Landscape (GDL) is unwarranted and should be reconsidered. The assessment presents further correspondence to HES setting this out and referencing precedent where HES have removed an objection based on similar impacts.

Additionally, in response to the objection from HES, the assessment includes consideration of an alternative layout with turbines T1, T2 and T3 removed. The assessment finds that there would be no change to the significance of effect on any assets other than Arniston House and GDL, which would reduce from Minor to Very Minor, remaining not significant in EIA terms.

3.3 Ornithology

Following comments received by RSPB and NatureScot, the Applicant commissioned Ecology Consulting to provide a further response on ornithology mitigation for the Proposed Development, which is set out in the note at **Appendix 13**.

An update to the original Ornithology Impact Assessment (OIA) chapter of the EIA Report has been undertaken to assess a scenario where turbines T1, T2 and T3 were removed from the scheme. This assessment and its supporting documents are included at **Appendices 14 - 21**.

The conclusions of the updated OIA remain the same as those of the EIA Report, that there would be no significant effects on ornithology. In comparison with the Proposed Development, there would be a reduced bird collision risk (as a result of

fewer turbines), and the reduced layout footprint would also mean that the disturbance effects would also be reduced. Species with distributions concentrated at the western end of the proposed development such as lapwing and greylag goose would have higher reductions in the magnitude of these effects. In relation to the key NS wider countryside test, the Proposed Development would not affect the favourable conservation status of any bird species of conservation importance within the NHZ, either alone or in combination with other schemes. It would also not result in any adverse effect on the integrity of any SPA qualifying interests, nor would it result in any breach of the Habitats Regulations.

3.4 Ecology

The Applicant's ecologists, SLR Consulting (formerly MacArthur Green), have provided a response to Midlothian Council's comments relating to ecology and biodiversity. This has been provided by way of a letter, which is included at **Appendix 22** of this Report. The response deals with each paragraph of the Council's Report to Committee in turn and reiterates that the information presented in the EIA and March 2025 AI Report provides a robust ecological assessment in line with all relevant legislation and policy guidance.

The requests from consultees for the removal of turbines T1, T2 and T3 from the Proposed Development would reduce both the overall land-take of the scheme and the amount of land available as part of the Outline Biodiversity Enhancement Management Plan (OBEMP). Therefore, in order to provide a more complete assessment of the impacts of a reduced scheme, **Appendix 23** provides a revised Biodiversity Net Gain (BNG) assessment based on a scenario where turbines T1, T2 and T3 were removed from the scheme. The outcome would be a reduction in overall BNG from 33% to 30%.

Appendix 1 - Updated LVIA Report

Appendix 2 - Comparative ZTV (Blade Tip)

Appendix 3 - Comparative ZTV (Hub Height)

Appendix 4 - LVIA Wireline Visualisations

Appendix 5 - LVIA Residential Properties Plan

Appendix 6 - LVIA Residential Properties Wirelines

Appendix 7 - Updated Cultural Heritage Assessment

Appendix 8 - Updated Cultural Heritage Figure 7.1a

Appendix 9 - Updated Cultural Heritage Figure 7.1b

Appendix 10 - Updated Cultural Heritage Figure 7.2

Appendix 11 - Updated Cultural Heritage Figure 7.3

Appendix 12 - Updated Cultural Heritage Wirelines

Appendix 13 - Curlew & Black Grouse Mitigation Note

Appendix 14 - Updated OIA Report

Appendix 15 - OIA Update Figure 1

Appendix 16 - OIA Update Figures 2 - 5

Appendix 17 - OIA Update Figures 6 - 10

Appendix 18 - OIA Update Figures 11 - 15

Appendix 19 - OIA Update TA 9.5

Appendix 20 - OIA Update TA 9.6

Appendix 21 - OIA Update TA 9.7

Appendix 22 - Ecology Response to Midlothian Council

Appendix 23 - Ecology Technical Memo