30 November 2025

Energy Consents Unit
Scottish Government
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Glasgow
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SLR Project No.: 405.064807.00001

IF Reference No.: 63341

RE: Clune Wind Farm: Response to Ironside Farrar PLHRA Stage 1 Checking Report

This letter has been prepared in response to the recommendations made by Ironside Farrar Ltd (IF), in their Peat Landslide Hazard Risk Assessment (PLHRA), Clune Wind Farm (The Proposed Development), Stage 1 Checking Report, dated 8th July 2025.

IF presented recommendations seeking further information to be included within the SLR PLHRA[1] report, prepared as part of the Environmental Impact Assessment (EIA)[2] for the Proposed Development.

In preparing this response, SLR Consulting Ltd (SLR) has addressed the recommendations requiring responses from the Applicant as outlined below.

1.0 Ironside Farrar Ltd Response (August 2025)

Recommendations requiring a response from the Developer are highlighted in bold with SLR response in italics:

1) **Comment is requested as to why the batching plant has not been probed over its full area on a 10m grid as per the ECUBPG.**

SLR Response:

The original batching plant layout was fully probed to a 10m grid. Based on the peat depth data from the phase 1 and phase 2 fieldwork the batching plant area was extended in a further design iteration. Given the extensive peat probing within the area and absence of significant peat deposits >0.5m it is deemed sufficient for the assessment and additional probing is unlikely to change the outcome of the assessment.

2) **The PLHRA should include an account of the density of Phase 2 peat probing undertaken.**

SLR Response:

Phase 2 probing was undertaken extensively across the proposed infrastructure. Where possible, phase 2 probing saw detailed probing undertaken across the Proposed Development layout, focussing on access tracks, turbines, hardstandings and other site infrastructure. Phase 2 probing was typically undertaken on linear infrastructure (permanent / temporary tracks) at 25 m to 50 m spacings with offset probing locations

1 Clune Wind Farm Technical Appendix 9.1 Peat Landslide Hazard and Risk Assessment. SLR, September 2024

2 Clune Wind Farm Environmental Impact Assessment Report (EIAR).

either side (approximately 10 m to 25 m). Infrastructure (turbines, hardstandings, substation compound, temporary construction compounds, borrow pits, etc.) was typically probed at 10 m grid spacings.

3) **Areas of forestry and artificial drainage are shown in the north of the Proposed Development, but these do not appear to have been taken into consideration as part of the likelihood assessment although they are noted as potentially influencing peat slide – please confirm.**

SLR Response:

The only area of forestry/artificial drainage close to the infrastructure is located along the northern edge of the existing access track. No areas of instability have been noted in relation to forestry and artificial drainage along this section. As previously stated, any areas of existing instability are included in our assessment as detailed in Section 5.0.

4) **The A9 road and an adjacent railway are in close proximity to proposed access tracks northeast of the site and justification is required as to why they have not been included as potential receptors. Please also confirm whether ecology has been included as a receptor.**

SLR Response:

There are no risk locations located within 1km of the A9/railway line, as such they have not been designated as a receptor from any potential peat instability. SLR has identified the most sensitive receptor for each of the identified risk zones within Table K. Ecological receptors have been included and identified where appropriate.

5) **Further work is required to justify that the mitigation proposals are credible and detailed enough to control the risks associated with peat slide. This mainly relates to excavation being the primary form of mitigation proposed at 12 of the 15 locations. Section 3.4 of this audit refers and presents the specific queries to be addressed.**

SLR Response:

Table K of the PLHRA has been updated and attached to this response. Additional mitigation measures (including micro-siting and floating infrastructure) have been provided in the first instance and prior to excavation.

6) **It is queried whether there are any specific locations where micro siting should be used as a form of mitigation within the Proposed Development.**

SLR Response:

This has been detailed within updates to Table K.

7) **Given the number of areas where peat excavation is proposed as a primary mitigation further work is required to demonstrate that the mitigation is robust, credible, and detailed enough to justify that risks are controllable. The PMP does not appear to include any excavation for Peat Slide Mitigation and it is important that volumes are clearly identified as part of the EIAR. The PMP may require to be updated as part of this exercise.**

SLR Response:

Mitigation provided has been updated to be more detailed and specific to the location as shown in the updated Table K provided below. Micrositing has been considered, and is included as a mitigation measure.

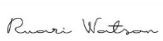
SLR have prepared a Peat Management Plan as part of the application (Technical Appendix 9.2 of the EIA Report) which details initial peat excavation volumes required to construct the Proposed Development. We can confirm that a robust estimation of peat excavation volumes has been undertaken as part of the assessment. Peat excavation volumes have been calculated across the Proposed Development assuming that the peat is fully excavated at each infrastructure element. If the Proposed Development was consented, additional data would be collected during detailed ground investigation and reviewed following any micrositing to calculate the detailed peat excavation volumes required to mitigate peat slide risk. This should be undertaken during the detailed design stage by a suitability qualified geotechnical engineer using all available data. Therefore, the excavation volumes included within the PMP are considered appropriate for the assessment.

Closure

We trust that this addresses the concerns raised in the Stage 1 checking report. If any further clarification is required, please do not hesitate to contact us.

Regards,

SLR Consulting Limited



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Attachments

Updated PLHRA Table K

Table L: Risk Register

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
1	Medium	Very Low	Insignificant	Borrow pit	Upgraded track	Risk location impacted by an isolated pocket of peat (up to 3 m). Peat observed to be in hollows and not on steeper slopes. Borrow pit design should be orientated to avoid excavating within this area. Suitable barriers could be installed around deep peat to avoid excavations being undertaken. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
2	Medium	Low	Significant	Borrow pit	Allt Lathach (watercourse)	Risk location impacted by localised peat deposits (0.5 to 2.5 m) and steep slopes. Deeper peat observed to be in hollows and not on steeper slopes. Excavation of peat prior to development of borrow pit would reduce and mitigate risk of peat landslide towards the receptor. Peat and soils will be stripped prior to the working of the borrow pit with suitable prevention methods put in place to stabilise cuttings. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
3	Medium	Low	Significant	Borrow pit	Allt Lathach (watercourse)	Risk location impacted by localised peat deposits (0.5 to 2.5 m) and steep slopes. Deeper peat observed to be in hollows and not on steeper slopes. Excavation of peat prior to development of borrow pit would reduce and mitigate risk of peat landslide towards the receptor. Peat and soils will be stripped prior to the working of the borrow pit with suitable prevention methods put in place to stabilise cuttings.	Insignificant

General - Internal

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	
4	Medium	Low	Significant	Upgraded Track	Allt Lathach (watercourse)	Risk at this location is negligible due to existing access in place with no instability noted. Upgrades to any track will involve minimal excavations and tying into existing access track. Excavation of any peat deposits prior to the extension of access track would reduce and mitigate risk of peat landslide towards the receptor. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
5	Medium	Low	Significant	Borrow pit	Unnamed watercourse	Risk location impacted by localised peat deposits (0.5 to 2.5 m) and steep slopes. Deeper peat observed to be in hollows and not on steeper slopes. Excavation of peat prior to development of borrow pit would reduce and mitigate risk of peat landslide towards the receptor. Peat and soils will be stripped prior to the working of the borrow pit with suitable prevention methods put in place to stabilise cuttings. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
6	Medium	Low	Significant	Excavated Track	Unnamed watercourse	Risk location impacted by localised peat deposits (0.5-2.5 m) and steep slopes. Micro-siting track out of peat should be considered as the first mitigation measure.	Insignificant

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						Construction of floated track through deeper peat deposits should be considered as a mitigation measure which would remove the requirement to excavate peat. Where floating track is not deemed practicable, excavation of peat prior to construction would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	
7	Medium	Low	Significant	Floating Track	Unnamed watercourse	Risk location impacted by localised peat deposits (0.5-2.5 m) and steep slopes. Micro-siting track out of peat should be considered as the first mitigation measure. Construction of floated track is proposed as a mitigation measure which would remove the requirement to excavate peat. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
8	Medium	Low	Significant	T20 Hardstanding	Upgraded Track	Risk location impacted by very localised peat deposit (0.5-2 m) and steep slopes. Peat will be excavated as part of turbine foundations design which would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
9	Medium	Low	Significant	Excavated Track	Unnamed watercourse	Risk location impacted by localised peat deposits (0.5-1.5 m) and steep slopes. Micro-siting track out of peat should be considered as the first mitigation measure. Construction of floated track through deeper peat deposits should be considered as a mitigation measure which would remove the requirement to excavate peat. Where floating track is not deemed practicable, excavation of peat prior to construction would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works.	Insignificant

General - Internal

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	
10	Medium	Very Low	Insignificant	Temporary blade laydown	Existing track (estate track)	Risk location impacted by localised peat deposits (up to 1.5 m). Micro-siting laydown out of peat should be considered as the first mitigation measure. Construction of floated laydown areas should be considered as a mitigation measure which would remove the requirement to excavate peat. Where floating track is not deemed practicable, excavation of peat prior to construction would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
11	Medium	Very Low	Insignificant	Floating Track	Unnamed watercourse	Risk location impacted by localised peat deposits (0.5-2 m) and steep slopes. Micro-siting track out of peat should be considered as the first mitigation measure.	Insignificant

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						Construction of floated track is proposed as a mitigation measure which would remove the requirement to excavate peat. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	
12	Medium	Low	Significant	Excavated Track and T8 turbine & hardstanding	Unnamed watercourse	Risk location impacted by very localised peat deposit (0.5-1 m) and steep slopes. Risk of peat instability negligible due to absence of substantial peat deposits across infrastructure. Excavation of peat prior to construction would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. No further additional mitigation measures are deemed necessary due to absence of peat deposits. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
13	Medium	Low	Significant	T3 turbine & hardstanding	Allt an-t-Sionnaich	Risk location impacted by very localised peat deposit (0.5-2 m) and steep slopes. Peat will be excavated as part of turbine foundations design which would reduce and mitigate risk of peat landslide towards receptor. Suitable shoring of excavations would assist in mitigating risk during construction. Catch wall ditches or fences could	Insignificant

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	
14	Medium	Very Low	Insignificant	Floated Track	Allt an-t-Sionnaich	Risk location impacted by localised peat deposits (0.5-2.5 m) and steep slopes. Micro-siting track out of peat should be considered as the first mitigation measure. Construction of floated track is proposed as a mitigation measure which would remove the requirement to excavate peat. Catch wall ditches or fences could be constructed downslope of the risk location to mitigate against any peat slide during construction works. Drainage pathways should be maintained during and post construction to reduce risk of peat slide. Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	Insignificant
15	Medium	Low	Significant	Upgraded Track	Unnamed watercourse	Risk at this location is negligible due to existing access in place with no instability noted. Upgrades to any track will involve minimal excavations and tying into existing access track. Excavation of any peat deposits prior to the extension of access track would reduce and mitigate risk of peat landslide towards the receptor. Drainage pathways should be maintained during and post construction to reduce risk of peat slide.	Insignificant

Identified Risk Location	Risk Rating	Impact Rating	Previous Hazard Ranking	Infrastructure at Risk Zone	Key Receptor	Mitigation	Revised Hazard Ranking
						Good construction practices, as detailed in Section 6.3 and 6.4 of the PLHRA[1], should be followed to mitigate against any instability.	