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Chapter 15

Synergistic Effects, Summary of Mitigation and Residual Effects

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Glossary

Term	Definition
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of drawing together by the developer, in a systematic way, a description of the development and information relating to the likely significant environmental effects arising from a Proposed Development
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Regulation 5
The Proposed Development	The proposed Scawd Law Wind Farm development
The Proposed Development Area	The development area within the red line site boundary (application area) as shown in Volume 3 Figure 1.2: Site Layout.
Synergistic Effect	The result of individual effects from different topic areas assessed in combination
The Applicant	Fred. Olsen Renewables Limited

List of Abbreviations

Abbreviation	Description
ALAA	Abnormal Load Access Assessment
amsl	Above mean sea level
CEMP	Construction and Environmental Management Plan
CO_2	Carbon dioxide
dB	Decibel
ECoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
GDL	Garden and Designed Landscape
HMP	Habitat Management Plan
IOF	Important Ornithological Feature
LCT	Landscape Character Type
MoD	Ministry of Defence
NATS	National Air Traffic Services
NERL	NATS En Route
NSA	National Scenic Area
NVIS	Night Vision Imaging System
PPIP	Pollution Prevention and Incident Plan
SAC	Special Area of Conservation
SBC	Scottish Borders Council
SEPA	Scottish Environment Protection Agency
SLA	Special Landscape Area
SPA	Special Protected Area
SPP	Species Protection Plan
TMA	Terminal Control Area
TMP	Traffic Management Plan
TTWA	Travel To Work Areas

15.1 INTRODUCTION

15.1.1 This chapter presents: a summary of the topics scoped in for the Environmental Impact Assessment (EIA); the consultees which were consulted/responded during the EIA; where in the Environmental Impact Assessment Report (EIAR) these responses have been addressed, if applicable; the EIA results where these are potentially significant; any mitigation proposed; and any residual effects. Synergistic effects are potential effects which may be caused through a combination of effects from different topics, and these are assessed in Section 15.1 below.

Table 15.1: Summary of Effects, Mitigation and Residual Effects

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
Landscape & Visual	• Scottish Borders Council • NatureScot (previously Scottish Natural Heritage) • Peebles Community Council • Walkerburn/ Innerleithen/Stow Community Council • Heriot Community Council • Clovenfords and District Community Council • Tweedale East/Clovenfords Community Council • Ettrick & Yarrow Community Council • Innerleithen and District Community Council • Parish of Stow Community Council • Mountaineering Scotland • John Muir Trust • Scottish Wild Land Group	Chapter 6	The Proposed Development is situated entirely within Landscape Character Type (LCT) 90: Dissected Plateau Moorland. As to be expected from a modern commercial wind energy generation development, it is considered the magnitude of change on the landscape resource of the site would be Substantial, resulting from a large geographical extent and major size and scale of proposed changes but for a short period of time. This results in a **major significant** effect on the landscape resource of the proposed site area during the construction and decommissioning states of the Proposed Development. Following construction, the magnitude of change on the landscape resource of the site would remain **Substantial,** resulting from the large geographical extent of the site area affected and the introduction of 8 vertical elements into the landscape that would be long term and reversible. This is considered to result in a **Major Significant Effect** on the proposed site area during the operational stage of the Proposed Development. Within the wider study area, four of the seven LCTs are predicted to receive significant effects as a result of the Proposed Development – LCT 93, LCT 195 and LCT 178. All are predicted to receive **Moderate** significant effects. Thereafter, potential effects would reduce as a result of distance and screening from landform, woodland and forestry. The Proposed Development would not be located within any national or local designations but would lead to significant effects in Upper Tweeddale National Scenic Area (NSA) and Tweedsmuir Uplands/Tweed Valley/Tweed, Ettrick and Yarrow Special Landscape Areas (SLA)s due to the extent of visibility experienced at distances of 12.4 km to the north-east and 15 km to the south respectively. Of the 23 selected viewpoints that were identified, 15 were identified as being significant on account of the close view obtained of the Proposed Development. The viewpoints assessed as significant range between 1.2 – 13.9 km, this is based on the openness of the view, extent of development visible, it's prominence within the view, and the sensitivity of the receptor. Four of the six residential properties assessed were predicted to receive a **significant effect**. This would be due to the openness of the view within 3 km of the proposed turbines however, none were identified as receiving an effect to the extent that the Proposed Development would be overbearing and result in it being an unattractive place to live. Of the 12 route receptors assessed, five were predicted to receive a **significant effect –** minor road on the southern bank of the River Tweed, Southern Upland Way, Cross Border Drove Road and Core Paths No. 161 and 163.	The iterative design approach aimed to mitigate significant effects through careful siting and design of developments. The design strategy for the key elements of the Proposed Development has taken into account the following objectives: • To maximise site efficiency and electricity production; • To provide a turbine layout with simple form, which relates to the landform and landscape character of the site and its surroundings; • Retain a suitable separation between operational / consented wind farms and the Proposed Development; • To avoid areas of constraint where practical; • To create a turbine layout which reflects the scale of the landscape in which it is located; • To avoid an overly complex and visually confusing layout; • To achieve a balanced composition of the turbines against the landscape and skyline from key viewpoint locations; • To relate turbine height to topography; • To give due consideration to turbine proportions; and • To reflect the pattern of nearby existing and consented wind farms as far as practical.	In summary, the Proposed Development is in an area identified in the Scottish Borders Council Supplementary Guidance: Renewable Energy, as having the potential for large-scale wind farm development if sensitively located. Overall, the scale and topography of the receiving landscape is considered appropriate to accommodate the Proposed Development. **Significant effects** have been identified although these are relatively limited given the scale and size of the Proposed Development. This includes the upper slopes of the Tweed Valley, hill tops to the north, east and south, short sections of minor roads and longer sections of footpaths within the area including the Southern Upland Way. **Significant landscape effects** would be restricted to four LCTs including the host LCT and a further 3 LCTs located to the east and south covering the Tweed Valley and Southern Uplands to the south. This would affect a small part of the overall 45 km study area where 55 LCTs would receive a non-significant or no change to their key characteristics as a result of the Proposed Development. The majority of **significant visual effects** are identified as typically occurring within approximately 15 km from the nearest proposed turbine. This is mainly from hill tops and walking routes where the Proposed Development will appear in open views.

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
				The design of associated infrastructure such as tracks, powerlines, substations and control buildings have also been designed with consideration to the above principles.	Cumulative effects would arise mainly from the addition of the Proposed Development in combination with the Greystone Knowe development. This would increase the concentration of turbines in the Dissected Plateau Moorland LCT as a result of two operational wind farms and an application site being located within the same LCT.
Ecology	• NatureScot • Scottish Borders Council • Royal Society for the Protection of Birds • River Tweed District Salmon Fishery Boards • Fisheries Management Scotland • Scottish Wildlife Trust	Chapter 7	An assessment has been made of the potential for significant effects of the Proposed Development on habitats and non-avian species. The Proposed Development is not expected to impact upon the qualifying interest the River Tweed Special Area of Conservation (SAC) and Moorfoot Hills SAC therefore **no likely significant effect** can be concluded. The Proposed Development is considered likely to have a **low magnitude** and **not significant** effect on wet/dry modified bog. In relation to bats, the effects as a result of the Proposed Development are assessed as being **low – moderate negative but not significant**. The Proposed Development is considered likely to have a **low magnitude and not significant effect** on fish.	Effective mitigation measures are implemented through the design process, good practice guidelines will be followed during construction. A Habitat Management Plan (HMP) is also proposed which aims to improve and restore areas of wet/dry modified bog and enhance riparian habitat within the Proposed Development Area (see Figure 7.9, Volume 3a). However, as described in Chapter 7: Ecology, much of the modified bog within the Proposed Development Area already has areas of extensive drainage and/or hagging and erosion. Existing bog habitat is limited in area and is already degraded and no onsite bog habitat restoration is proposed, instead it is proposed that financial support is provided to suitable local bog restoration projects with the aim of beneficial enhancement for this habitat type within the local authority region. It is proposed that specific methods to be employed will be decided and agreed with consultees post-consent, as part of the production of the draft HMP. This approach has been discussed and agreed in principle with SBC.	**No significant effect**
Ornithology	• Scottish Borders Council • NatureScot • Royal Society for the Protection of Birds • Energy Consents Unit	Chapter 8	The assessment considered the various potential impacts arising from the construction, operation and decommissioning of the Proposed Development, and evaluated the significance of these impacts on the identified key species of interest in the context of their conservation value, sensitivity to wind farm development and the scale of the potential effects.	By applying effective embedded mitigation measures, mainly through the design process, and following good practice guidelines during construction, including production of a Species Protection Plan (SPP), the magnitude of residual effects of the Proposed	**No significant effects**

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
			The Proposed Development is predicted to have moderately low or negligible, and therefore not significant, effect on all of the Important Ornithological Features (IOF)'s recorded during the construction and operation phases. Additional mitigation is proposed in order to further minimise effects and will ensure compliance with legislation and good practice guidance. In addition, the Proposed Development is not expected to impact upon the qualifying interest of either Special Protected Areas (SPA)'s and therefore **no likely significant effect** can be concluded.	Development is assessed as being low/negligible in terms of magnitude, and thus not significant in terms of the Environmental Impact Assessment (EIA) Regulations. However additional mitigation is proposed in order to further minimise effects including a HMP.	
Hydrology, Geology and Hydrogeology	• Scottish Borders Council • Scottish Environment Protection Agency • Scottish Water • NatureScot	Chapter 9	An assessment has been carried out of the likely significant effects of the Proposed Development on the hydrological, hydrogeological and geological environment. The assessment has considered the site preparation, construction and operation of The Proposed Development. The potential effects on the hydrological, geological and hydrogeological environment have considered: • Pollution Incidents; • Erosion and sedimentation; • Changes to water resources i.e. private water supplies; • Modification of surface water and groundwater flows; • Modification of natural drainage patterns; • Impediments to flow and flood risk; • Excavation of material, including rock, soils and peat; • Peat instability; and • Compaction of soils. Good practice design and construction of the Proposed Development delivered through a skilled team of competent workers, with mitigation and compliance monitored in collaboration with Scottish Environment Protection Agency (SEPA), Scottish Borders Council (SBC) and other engaged stakeholders, will result in a risk that is considered to be **not significant** in terms of the EIA Regulations.	Following the identification and assessment of the key receptors, taking into account the potential effects, a comprehensive suite of mitigation and good practice measures has been incorporated into the design, including extensive buffer areas. In addition, a site-specific Construction and Environmental Management Plan (CEMP) as well as detailed design of infrastructure and associated mitigation will be implemented to protect the groundwater and surface water resources from pollution and minimise changes to the hydrological environment.	**No significant effect.**
Carbon Balance	• NatureScot • Energy Consents Unit • Scottish Environment Protection Agency	Technical Appendix 9.1	The results of the Carbon Balance assessment reveal that the net impact of the Proposed Development will be positive overall, as over its 35-year lifespan, it is expected to generate over 33 years' worth of clean energy if it replaced fossil fuel-mix electricity generation and nearly 32 years' worth of clean energy even if it replaces cleaner grid-mix electricity generation. Therefore, over the expected 33 years that the wind farm is likely to be generating carbon-free electricity, this could result in expected carbon dioxide (CO_2) emission savings of over 1,629,705 tonnes of CO_2 when replacing fossil fuel-mix electricity generation. **This illustrates a positive net impact through contributing significantly towards the reduction of GHG from energy production.** Much of the modified bog within the Proposed Development Area already has areas of extensive drainage and/or hagging and erosion. Existing bog habitat is limited in area and is already degraded within the Proposed Development Area. No onsite bog habitat restoration is proposed, instead it is proposed that financial support is provided to suitable local bog restoration projects. It is proposed that specific methods	N/A	**No significant effect.**

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
			to be employed will be decided and agreed with consultees post-consent, as part of the production of the draft HMP.		
Cultural Heritage	• Scottish Borders Council Archaeology Service • Historic Environment Scotland • Tweed Foundation • Visit Scotland	Chapter 10	There are **no predicted significant effects** on the setting of heritage assets arising from the construction or operation of the Proposed Development. The development therefore does not significantly adversely affect the fabric or setting of any Listed Buildings, the integrity of the setting of any Scheduled Monuments or the setting of any Garden and Designed Landscapes (GDL)s.	Mitigation in relation to direct impact on most heritage assets has been embedded into the design of the proposed infrastructure, in order to avoid direct impacts where possible. Appropriate mitigation would be undertaken in the form of: • Fencing off assets that may be accidentally damaged, specifically Assets 55 and 57; and • A watching brief on the elements of the ground works that would have a direct impact on heritage assets, specifically Asset 56. The precise scope of the watching brief would be negotiated with SBC Archaeology Service and the agreed mitigation programme would be documented in an agreed Written Scheme of Investigation. No mitigation is proposed with respect to the potential indirect impacts on setting.	**No significant effect.**
Noise	• Scottish Government • Scottish Borders Council Environmental Health	Chapter 11	A construction noise assessment has been undertaken with reference to BS5288:2009, Noise and Vibration Control on Construction and Open Sites, which indicates that noise from construction activities will be significantly below the adopted daytime noise limit of 65 dB L_{Aeq}, and therefore **no significant construction noise impacts** are predicted. Noise associated with off-site highways improvements and cabling requirements to the grid connections is **not significant** due to the relatively short-term impacts. At residential receptor locations that are financially involved, operational noise levels have been assessed against the financially involved limit of 45 dB L_{A90}. In addition, **no significant cumulative** operational noise impacts are predicted. **No significant impacts** are predicted for road traffic noise generated by construction traffic accessing the site during the construction phase of the development as the predicted noise increase is negligible, or overall noise levels are below the relevant construction noise limit.	No specific operational mitigation is required as the relevant noise limits are met. However, noise during construction works would be controlled by generally restricting works to standard working hours and exclude Sundays, unless specifically agreed otherwise Noise from the operation of the wind farm will also be controlled through the implementation of planning conditions on noise that contain permissible limits. In this way, if any operational noise issues arise then measurements can be undertaken to ascertain whether the site is operating within the appropriate noise limits. Mitigation will be implemented such that, although blasting activities may be detected at residential properties, the impact is not significant.	**No significant effect.**

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
Traffic and Transport	• Scottish Borders Council Roads Planning Service • Transport Scotland • Scottish Borders Council • Midlothian Council	Chapter 12	The traffic and transport assessment considered the most likely construction methods, programme and sequencing against baseline traffic conditions. In addition, the traffic impacts associated with the abnormal load deliveries were also assessed. An Abnormal Load Access Assessment (ALAA), including swept path analysis at particular pinch points was also prepared demonstrating the viability of the proposed abnormal load route. The assessment concludes that, with the incorporation of suitable mitigation measures secured through a construction Traffic Management Plan (TMP), there will be **no significant** traffic effects associated with the Proposed Development.	A preliminary TMP has been prepared. The assessment has been based on a number of conservative assumptions and will be clarified post consent and once a civil contractor is engaged. Therefore, a Planning Condition is expected to be applied to development for a final TMP to be prepared and approved by SBC post consent and prior to construction works commencing.	**No significant effect.**
Socioeconomics	• Energy Consents Unit • John Muir Trust • Visit Scotland	Chapter 13	The Study Areas adopted in this Socioeconomics, Tourism and Recreation assessment are as follows: • **Labour Market Study Area**: Assessed across both the Galashiels and Peebles Travel to Work Areas (TTWA) and SBC Study Area; and • **Tourism and Visitor Economy Study Area**: To enable consistency with the significant visual effects concluded within Chapter 6 – Landscape and Visual, tourism effects are assessed within a 12 km radius of the site capturing key tourist recreational routes and tourism assets. All receptor groupings make important contributions to the tourism and recreation sector as a whole. The sector is likely to experience a **temporary Low / Moderate adverse effect** from the construction of the Proposed Development. This would be considered **not significant** in the context of the EIA Regulations. The sector is likely to experience a **Long-Term Low / Moderate adverse effect** from the operation of the Proposed Development as a whole. This would be considered not significant in the context of the EIA Regulations. The decommissioning of the Proposed Development will result in a Low magnitude of change on the Onshore Wind Sector receptor (a medium sensitivity receptor), resulting in a **Short-Term Low / Moderate Beneficial effect**.	Based on capital cost estimated provided by the Applicant in November 2022, the construction of the Proposed Development is expected to require a total capital expenditure of £80.1million. This will give rise to employment and associated expenditure in the economy (direct, indirect and induced) The construction of the Proposed Development is estimated to support a total 595 gross temporary construction jobs over the 15-month construction programme across the study area. Given the nature, scale, and location of the Proposed Development, some degree of adverse visual amenity impacts is inevitable during the construction and operational phases of the Proposed Development, including on adjacent recreational receptors. However, the sympathetic integration of the site into the wider landscape has been a key design objective together with retention of the site's semi-natural character and key features. No further mitigation measures are proposed to reduce the level of visual effects identified for the proposed development, resulting in no change to the associated effects on recreational receptors assessed.	**No significant effect.**

Topic	Consultees	EIAR Reference	Potential Significant Effects	Proposed Mitigation	Residual Effects
Aviation	• Scottish Borders Council • Scottish Borders Council Landscape Architect • Ministry of Defence • National Air Traffic Services (NATS) • NatureScot • Edinburgh Airport • Glasgow Airport • Defence Infrastructure Organisation • Nuclear Safety Directorate • Civil Aviation Authority	Chapter 14	The Proposed Development Area is located in uncontrolled airspace from ground level to 5,500 feet above mean sea level (amsl). Above that level is the Class D controlled airspace of the Scottish Terminal Control Area (TMA), within which air traffic services are provided by the NATS En Route (NERL) Prestwick Centre. Radars used to provide these services include those at Great Dun Fell (Cumbria) and Lowther Hill (South Lanarkshire). Lowther Hill and Great Dun Fell radars are predicted to receive visibility of turbines. In addition, the airspace overhead of the Proposed Development is in frequent and regular use by aircraft inbound to, and to some extent outbound from, Edinburgh Airport and other airports to the north of Edinburgh. Due to the height of the Proposed Development, it is considered a potential obstruction hazard to low flying aircraft.	The Applicant is in discussions with NERL on technical mitigation measures to address the impacts on the relevant radars. A Radar Mitigation Scheme will be agreed by the Applicant and NATS, secured by a planning conditions, will ensure the effects of the Proposed Development on the Lowther Hill and Great Dun Fell radars are mitigated for the lifetime of the wind farm. To avoid obstruction, the Proposed Development will be notified to the Ministry of Defence (MoD) and civil airspace users and marked on aeronautical charts and electronic aviation obstacle databases to enable aircrew to avoid the turbines horizontally and/or vertically. Infra-red lighting will be fitted to all turbines in the Proposed Development to enable aircrew using Night Vision Imaging System (NVIS) to see and avoid them at night. Medium intensity steady red lights will also be fitted to all turbines in the Proposed Development to assist non-NVIS-equipped aircraft to avoid the turbines at night.	**Moderate/minor significance**
Telecommunications	• Joint Radio Company • British Telecom • National Grid	Chapter 14	None identified.	Conduct pre-construction checks to ensure assets remain unaffected.	**No significant effect.**
Existing Infrastructure	• National Grid • Scottish Gas Networks	Chapter 14	None identified.	Conduct pre-construction checks to ensure assets remain unaffected.	**No significant effect**.
Public Access	• British Horse Society • Scotways	Chapter 14	No significant effects identified.	Conduct pre-construction checks to ensure assets remain unaffected.	**No significant effect.**
Shadow Flicker	N/A	Chapter 14	Standard guidance states that shadow flicker occurs within ten rotor diameters of the turbine, and that effects only occur within 130 degrees either side of north relative to the turbines. Beyond these limits it is considered that potential impacts associated with shadow flicker will not be significant. As there are currently no residential properties identified within 10 rotor diameters of the nearest turbines the need to undertake an assessment was scoped out and was not considered within this Environmental Impact Assessment Report (EIAR).	N/A	N/A

15.2 SYNERGISTIC EFFECTS

15.2.1 An assessment of synergistic effects ensures that the assessments provided in the EIAR for each topic are not considered in isolation. Chapters 7 and 8 of the EIAR assess the biological environment (Ecology and Ornithology). Chapters 6, 9 and 10 assess the physical environment (LVIA, Hydrology and Cultural Heritage) and Chapters 11, 12, 13 and 14 assess population and human health (Noise, Traffic and Transport, Socioeconomics and Aviation and Other Matters). It is acknowledged that there are also some potential overlaps between the physical environment and population and human health.

15.2.2 This assessment considers the potential synergistic effect of related residual effects during construction, operation, and decommissioning of the Proposed Development. A synergistic effect during decommissioning is considered to be of similar or less significance than that created during construction and therefore they are discussed together below.

Construction and Decommissioning

15.2.3 During the construction and decommissioning phases, potential adverse synergistic effects are limited to the Proposed Development Area where there will be heavy plant operations, earth works, forestry operations and vehicle movements. These could result in potential synergistic effects upon physical and biological receptors including where there are overlaps between ecology, hydrology and hydrogeology. These effects would be temporary in nature, will be managed through a CEMP, Pollution Prevention and Incident Plan (PPIP), Traffic Management Plan (TMP) and Decommissioning Plan and in isolation have been assessed in the EIAR as not significant. These potential effects will also be monitored by an Environmental Clerk of Works (ECoW) and if deemed necessary a Planning Monitoring Officer enforced through planning condition(s). Given the limited number and extent of receptors, the limited effects predicted and their temporary nature, the synergistic effects during construction and decommissioning phases are considered not significant.

Operation

15.2.4 Potential synergistic effects during the operational phase relate primarily to overlaps between physical and human receptors and are limited to areas which are within or close to the Proposed Development Area where there may be a combination of potential visual, noise and shadow flicker effects.

15.2.5 The EIAR predicts that there are no significant adverse effects in isolation for noise and shadow flicker. None of the properties assessed have been identified to be affected to such a degree that they would become ‘widely regarded as an unattractive place where to live and/or the development is inescapably dominant or unpleasantly overwhelming’ according to guidance, Containment provided by the surrounding landscape of the Tweed Valley and uplands located to the south will restrict significant landscape and visual effects to the landscape within 8 km of the Proposed Development. Furthermore, a combination of all these effects at once is not possible and in sequence would be very limited in occurrence and duration. It is not considered that the synergistic effects would become overbearing such that these places become unpleasant locations to reside.

15.2.6 A number of road receptors, long distance footpaths and local paths were identified within the 45 km study area. The assessment has predicted a small number of these including a minor road on the southern bank of the River Tweed, Southern Upland Way, Cross Border Drove Road and Core Paths No. 161 & 163 within 5 km of the Proposed Development would receive significant effects to short sections where views can be obtained. As neither the potential visual effects or direct effects will prevent use of these in the long term, it is considered that the synergistic effects during construction and operation are not significant.

15.2.7 The inclusion of habitat management will restore degraded will restore areas of modified and damaged bog habitats within the Proposed Development Area. Restoration will focus on ditch blocking to rewet drained areas of peatland and restore areas of eroding peat, thus having a positive synergistic effect in this regard.

15.3 SUMMARY

15.3.1 This chapter of the EIAR summarises the potential effects of the Proposed Development as well as potential synergistic effects which consider such effects in combination. Following the implementation of mitigation primarily in the form of embedded mitigation in the siting and design of the proposal, potential significant adverse effects are restricted to isolated landscape and visual effects upon limited receptors within close proximity of the Proposed Development. As noted in Table 15.1; these are effects which are commonly associated with wind farms and in this regard need to be balanced against the benefits, for example:

- An HMP will be developed and agreed to restore areas of riparian habitats and overgrazed grassland within the Proposed Development Area;
- The Proposed Development will provide socioeconomic benefits through continuing employment opportunities it has already provided at the planning stage through the lifetime of the project following consent;
- The Applicant is committed to consulting with the local community on the inclusion of multi use trails to the west of the windfarm (to be pursued through a separate planning application).

15.3.2 In addition to the above, the Proposed Development will contribute towards meeting national renewable energy targets and reducing carbon dioxide emissions to help reach the national carbon net zero target.