



Cruach Clenamacrie Wind Farm

FEI Appendix 8.1

Response to Buglife and Butterfly Conservation

DATE:	15 August 2025	CONFIDENTIALITY:	Restricted
SUBJECT:	Consultation Response		
PROJECT:	Cruach Clenamacrie Wind Farm	AUTHOR:	Alastair Miller
CHECKED:	Sabrina Bremner	APPROVED:	Jon Seller

CRUACH CLENAMACRIE WIND FARM: RESPONSE TO CONSULTATION ON INVERTEBRATE FEATURES OF NOTE

To whom it may concern.

Further to the consultation responses recently received from Butterfly Conservation Trust and Buglife and follow up meetings on the 5th and 9th June respectively, the following technical note summarises points of note discussed in the meeting and provides further clarification on specific points raised during in consultation responses or during our meetings.

Impacts to Clais Dhearg SSSI and Mid-Argyll Important Invertebrate Area (IIA)

The presence of the Mid-Argyll IIA is acknowledged, particularly the Clais Dhearg Site of Special Scientific Interest (SSSI) designated partly for its dragonfly assemblage and population of the Marsh Fritillary *Euphydryas aurinia*. We also note the presence of the Black Lochs within the SSSI that support a population of the Medicinal Leech *Hirudo medicinalis*¹.

However, as discussed in the recent meetings, the connectivity between the Proposed Development and the SSSI populations of these species was acknowledged as unlikely. Consideration of these and other notable invertebrate species is discussed in turn, concluding that no effect is considered likely.

Marsh Fritillary

Based on the positive confirmation of Marsh Fritillary presence within the Site boundary we have acknowledged that the construction of the wind farm, battery storage facility and associated infrastructure could potentially cause the loss of suitable Marsh Fritillary habitat, which is acknowledged within the EIA report. We would like to provide assurance that the following mitigation measures will be incorporated, comprising:

- Pre-construction surveys will be undertaken both on-site and at the off-site habitat management units (HMUs) (now under Option with the Developer) to establish a baseline condition of the habitat that can be reassessed at a future date to determine if Marsh Fritillary habitat is improving, deteriorating, or not changing. Surveys will follow Butterfly Conservation Scotland Marsh Fritillary Habitat Monitoring Methods²;
- Micro-siting of development parcels with presence of an Ecological Clerk of Works (ECoW) to avoid/minimise impact to breeding habitat wherever possible (rather than reliance on translocation);

¹ Listed as Near Threatened: <https://www.iucnredlist.org>

² Butterfly Conservation Scotland - Marsh Fritillary Habitat Monitoring Method. Species on the Edge: A Brighter Future for Herb-rich Pastures.

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- Provision of a site-specific Construction Environmental Management Plan (CEMP) and pollution prevention measures relating to water quality and SSSI features such as leeches, dragonflies, prior to determination of the application; and
- Adoption of the Outline Habitat Management Plan (oHMP), which includes a combination of measures such as targeted removal of bog myrtle *Myrica gale*. This is present in high density in areas of suitable habitat comprising marshy grassland, with opportunities for re-wetting through ditch blocking to address any potential drying of conditions, and control of grazing in order to open up the sward and to help maintain availability of devil's-bit scabious *Succisa pratensis*; and the removal of *Rhododendron ponticum*, which is also contributing to smothering of large expanses of suitable Marsh Fritillary habitat.

Northern Emerald Dragonfly

- In 2024, WSP met with NatureScot and the County Dragonfly Recorder for Dumfriesshire and Lanarkshire on behalf of the British Dragonfly Society on the 13th June 2024 (at proposed Habitat Management Plan (HMP) units off-site) to discuss enhancement opportunities, focussing on Northern Emerald Dragonfly *Somatochlora arctica*, in addition to discussions around Marsh Fritillary management measures. The County Dragonfly Recorder concluded the off-site location (a known Northern Emerald site) seemed drier than previous years, with fewer sphagnum pools and greater extent of bog myrtle. It was agreed that any proposed management would need to be carefully balanced with the needs of other species within the habitat. Specific management was informed by Batty (2014)³ including ditch blocking, which would form a small part of the National Planning Framework 4 (NPF4) significant biodiversity enhancement requirement of the Proposed Development.

Medicinal Leech and water quality impacts

- The Black Lochs, approximately 1.8 km to the north of Site are known to support Medicinal Leech, which were recorded in the north loch in 2011 and central loch in 2012. Given the distance between the Site and these lochs and given the implementation of good practice measures when working in proximity to watercourses, no adverse effects to this species are anticipated. Similarly, any habitat management measures outlined within the oHMP will be subject to good practice measures, which will be embedded in relation to any related works in proximity to watercourses.

Wood Ants and Shining Guest Ant

- Buglife welcomes that targeted surveys were undertaken on wood ant nests (*Formica aquilonia* and *Formica lugubris*) and that a precautionary approach to the presence of Shining Guest Ant *Formicoxenus nitidulus*, has been taken to assume that this species could occur in any of the ant

³ Batty, P., 2014. Species Review 8. Journal of the British Dragonfly Society, p.32.
https://british-dragonflies.org.uk/wp-content/uploads/2020/11/JBDS_Vol30_1.pdf

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nests identified, regardless of the species of wood ant. Buglife supports the recommendation that wherever possible, any wood ant nest should be avoided with a minimum 20m buffer and that any necessary translocations of nests will follow best practice, as detailed in a Species Protection Plan.

Habitat Enhancement Measures:

Additionally, the requested commitments to the delivery of an off-site enhancement scheme will comprise the following:

- Voltalia will commit to the full implementation of the proposed off-site enhancement scheme for Marsh Fritillary in order to ensure that the identified habitat loss on site is appropriately accounted for. Importantly, the identified off-site land parcels (where Marsh Fritillary records have also been recorded by WSP ecologists at each location) have been secured with Option Agreements with the landowner, which should provide certainty as to this commitment.
- Mindful of the sensitive location of the off-site HMP units, close to several designated sites with vulnerable aquatic habitats supporting rare invertebrates, provisions of pollution and sediment control measures will be implemented for any proposals that could have hydrological influence. Specific measures will include further detailed site investigations, production of a pollution prevention plan within the detailed HMP, as well as ongoing monitoring.
- Voltalia can also provide assurance as to the long-term commitment for the lifespan of the windfarm and include an appropriately funded monitoring and maintenance programme to ensure the improved habitat remains in good condition.
- Additional commitment will also be incorporated within the HMP that will confirm that an appropriate adaptive management strategy will be implemented i.e. should the site enhancement scheme fail to deliver suitable benefits for Marsh Fritillary then the plan would be adapted appropriately, or resources diverted to a fresh site where suitable improvements can be made to ensure no net loss of habitat. We would anticipate engaging Butterfly Conservation and Buglife as part of the HMP steering group, specifically with evidence of management measures and monitoring outcomes pertaining to Marsh fritillary.