

# Appendix 4.3 Further EIA Consultation

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Energy Consents Unit

NatureScot

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Historic Environment Scotland

### HYDROLOGY, HYDROGEOLOGY & GEOLOGY

Scottish Environment Protection Agency

### TRANSPORT

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### TELECOMMUNICATIONS

Arqiva

Atkins

Joint Radio Company

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South Lanarkshire Council

### FORESTRY

Scottish Forestry

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# LANDSCAPE & VISUAL

East Ayrshire Council

**Jessica Yanetta**

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**From:** [REDACTED] >  
**Sent:** 11 August 2020 14:57  
**To:** [REDACTED]; Dale Turner  
**Subject:** FW: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment [PUBLIC]

**CLASSIFICATION: PUBLIC**

Hi there,

My colleague Jane passed the email below to me. Apologies, have been on annual leave so am just catching up on things.

I am content with the range of viewpoints proposed for East Ayrshire; Cairn Table, Nether Wellwood and Victory Park, Muirkirk. I am also supportive of the inclusion of Loudoun Hill as an additional viewpoint

I will be sending a more formal response back to the ECU this week on the scoping report generally, but this is hopefully useful in the meantime.

Many thanks,

Alison

Alison O’Kane  
Senior Planning Officer

Planning and Economic Development, The Opera House, 8 John Finnie Street, Kilmarnock, KA1 1DD  
Tel: [REDACTED]

Please note I do not work on Fridays

I am currently home working and working flexible hours as a result of Covid-19.

---

**From:** [REDACTED] >  
**Sent:** 03 August 2020 16:24  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale,

Thank you for considering the comments regarding the viewpoints. I am content with the viewpoints listed below subject to confirmation and any comments from South Lanarkshire Council and East Ayrshire Council.

James, Jane, ECU would welcome any comments you may have on the viewpoints listed below and the proposed night-time assessment?

David, thank you for SNH's comments on the viewpoints. It is noted that SNH has not yet had a chance to look at the detailed proposals for the night-time assessment.

Kind regards  
Ruth

**Ruth Findlay | Team Leader | Energy Consents Unit**  
The Scottish Government | [REDACTED]

---

**From:** Dale Turner <[REDACTED]>  
**Sent:** 28 July 2020 15:02  
**To:** Findlay RF (Ruth) <[REDACTED]>  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Ruth,

Thank you for your comments on the proposed viewpoints list for Cumberhead West Wind Farm.

Please find our response to each of your queries below:

***'From the ZTV Figure 4.2 of the Scoping Report, I would query the selection of VP6 - B7068, leaving Strathaven. A common viewpoint that is used in Strathaven is the war memorial. I would request that this viewpoint is considered and would welcome comments from the Council'.***

We would be happy to change this VP location to the War Memorial, assuming this change will be acceptable to South Lanarkshire Council.

***'Is there a suitable viewpoint from Sandford or nearby to assess the impact on this settlement? I may have missed it within the scoping report, though I am not sure on the reason for selecting VP 4 and VP5'.***

VPs 4 and 5 both cover local roads/properties/character in the area to the north of the site. However, we would be happy to change the location of VP5 to School Road in Sandford, again assuming that this change will be acceptable to South Lanarkshire Council.

***'Hyndford Bridge and Cairn Kinney are two other viewpoints I would request are considered'.***

We are happy to include both of these locations into the list of viewpoints.

***'In addition, it is not clear from the ZTV if Loudoun Hill is a suitable viewpoint that is worth considering'.***

We assume that you are referring to Loudoun Hill near Darvel, which is on the edge of the ZTV, but would have views of a number of the turbines. We are happy to include this location into the list of viewpoints.

The overall total of viewpoints would therefore increase to 18, with three new locations and two revised locations. These changes are summarised below.

ID	Proposed Viewpoint	Easting	Northing
1	Coalburn, Muirburn Place	281160	635512
2	M74 Overbridge	284424	635419
3	Lesmahagow-Hillcrest	281623	638622
4	Minor road, Brackenridge	276578	639692
5	<del>B7086, bridge crossing Kype Water</del> Sandford, School Road	<del>275027</del> 272040	<del>641626</del> 643087

ID	Proposed Viewpoint	Easting	Northing
6	<del>B7068, leaving Strathaven</del> <b>Strathaven, War Memorial</b>	<del>270787</del> <b>270448</b>	<del>643872</del> <b>644635</b>
7	A71, bridge crossing Calder Water	266379	641900
8	Black Hill	283198	643552
9	A70 Rigside	287708	635192
10	Tinto Hill	295316	634372
11	Douglas-Hill Street	283575	631020
12	Auchensaugh hill	285330	627198
13	Victory Park, Muirkirk	269388	627320
14	Nether Wellwood (A70)	264483	625095
15	Cairn Table	272410	624235
16	<b>Cairn Kinney</b>	<b>278468</b>	<b>621429</b>
17	<b>Hyndford Bridge</b>	<b>291488</b>	<b>641453</b>
18	<b>Loudoun Hill</b>	<b>260869</b>	<b>637928</b>

We would be grateful for your confirmation that you would be happy for us to proceed on the basis of the updated list set out above, subject to confirmation of this also being agreeable to the Council.

For your information, I have attached the confirmation from SNH that they had no further requests for additional viewpoints.

Regards,  
Dale

**Dale Turner**  
Director

**Pegasus Group**

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# Covid 19 & LPAs

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**From:** [REDACTED] >

**Sent:** 13 July 2020 17:58

**To:** Dale Turner [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale,

Further to your email below I can provide the following initial comments on the proposed viewpoints for the proposed Cumberhead West Wind Farm.

The comments from South Lanarkshire Council, East Ayrshire Council and SNH are important in agreeing the viewpoints for assessment. Therefore I have copied in all parties for their consideration of these comments from ECU.

Although the viewpoints use similar locations to that of Hagshaw Hill Repowering and Douglas West Extension it is acknowledged that the proposed Cumberhead West extends wind farm development to the north west.

From the ZTV Figure 4.2 of the Scoping Report, I would query the selection of VP6 - B7068, leaving Strathaven. A common viewpoint that is used in Strathaven is the war memorial. I would request that this viewpoint is considered and would welcome comments from the Council.

Is there a suitable viewpoint from Sandford or nearby to assess the impact on this settlement? I may have missed it within the scoping report, though I am not sure on the reason for selecting VP 4 and VP5.

Hyndford Bridge and Cairn Kinney are two other viewpoints I would request are considered.

In addition, it is not clear from the ZTV if Loundon Hill is a suitable viewpoint that is worth considering.

I trust these comments are useful at this stage and the final viewpoint list can be agreed in due course.

Kind regards  
Ruth

**Ruth Findlay | Team Leader | Energy Consents Unit**  
The Scottish Government | [REDACTED]

---

**From:** Dale Turner [REDACTED]

**Sent:** 22 June 2020 15:16

**To:** Findlay RF (Ruth) [REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dear Ruth,

Pegasus have been instructed to provide Landscape and Visual Impact Assessment (LVIA) services for the above project, where an EIA Scoping Request has recently been submitted to the Energy Consents Unit (ECU). The Scoping

Report (copy attached) sets out the proposed methodology and approach for the LVIA, including a selection of proposed viewpoints for both the day-time and night-time assessment work (page 22 and Appendix 4.1). In advance of providing a formal response, we would be very grateful if you could confirm your acceptance to the proposed viewpoints directly to me in response to this email, in order to allow us to progress with the photography work at the earliest opportunity. If you have any comments or queries on the viewpoints proposed, we would be pleased to discuss them with you. The approach to the LVIA proposed replicates that which was previously undertaken for the Hagshaw Hill Repowering and Douglas West Extension LVIA's which were also carried out by Pegasus. With that in mind, many of the proposed viewpoint locations are common to those agreed for the earlier assessments.

Please be in touch if you would like to discuss any matters further.

Regards,  
Dale

**Dale Turner**  
Associate Environmental Planner

**Pegasus Group**  
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# Covid 19 & LPAs

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## Energy Consents Unit

**Jessica Yanetta**

---

**From:** [REDACTED]  
**Sent:** 03 August 2020 16:24  
**To:** Dale Turner  
**Cc:** [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale,

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James, Jane, ECU would welcome any comments you may have on the viewpoints listed below and the proposed night-time assessment?

David, thank you for SNH's comments on the viewpoints. It is noted that SNH has not yet had a chance to look at the detailed proposals for the night-time assessment.

Kind regards  
Ruth

**Ruth Findlay | Team Leader | Energy Consents Unit**  
The Scottish Government [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 July 2020 15:02  
**To:** Findlay RF (Ruth) [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Ruth,

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Dale

**Dale Turner**  
Director

**Pegasus Group**

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# Covid 19 & LPAs

## Self Contingency Measu

---

**From:** [Redacted]  
**Sent:** 13 July 2020 17:58  
**To:** Dale Turner <[Redacted]>  
**Cc:** [Redacted]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

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Kind regards  
Ruth

**Ruth Findlay | Team Leader | Energy Consents Unit**  
The Scottish Government | [REDACTED]

---

**From:** Dale Turner [REDACTED]  
**Sent:** 22 June 2020 15:16  
**To:** Findlay RF (Ruth) <[REDACTED]>  
**Cc:** [REDACTED]  
**Subject:** Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dear Ruth,

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Please be in touch if you would like to discuss any matters further.

Regards,  
Dale

**Dale Turner**  
Associate Environmental Planner

**Pegasus Group**  
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NatureScot



## Jessica Yanetta

---

**From:** David Kelly [REDACTED]  
**Sent:** 08 July 2020 10:14  
**To:** Dale Turner  
**Cc:** Brian Denney; Theo Philip; Lindsay Smith  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale

Thanks for your email of 22 June requesting our agreement of the viewpoints to be used in the assessment of the Cumberhead West Wind Farm proposal.

Our comments on this, and a few other issues which we have noted when considering your proposals are as follows:

### *Study Area*

We note that the ZTV has been prepared out to 35km. We agree that this is suitable.

### *Viewpoints: Daytime*

We are content with the viewpoints selected.

### *Viewpoints: Night time*

We are content with the viewpoints selected. I've not yet had a chance to look at your detailed proposals for the night-time assessment in Appendix 4.1 of the Scoping Report, but at this stage we would highlight that the night time photomontages should show the cumulative picture and include turbine lights of other 'at application' developments in the view, including variation applications. We have also recently updated our general pre-application and scoping guidance to include further guidance on undertaking lighting assessments – see Annex 2 at <https://www.nature.scot/general-pre-application-and-scoping-advice-onshore-wind-farms>

### *Designations*

We note that some theoretical visibility is predicted from both the Upper Tweeddale National Scenic Area and the Talla-Hart Fell Wild Land Area. However, we do not consider that there are likely to be any significant effects on the qualities of these areas from the proposal.

I hope this is useful, but please let me know if you need anything further at this stage. I'll be on leave after this week until Monday 27 July, so we've agreed with the ECU that we'll provide our full scoping response by 11 August.

Finally, while we are supportive of the principle of renewable energy, our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is submitted as a formal application.

Regards

David

---

**From:** Dale Turner [REDACTED]  
**Sent:** 22 June 2020 15:13  
**To:** [REDACTED]  
**Subject:** Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dear Natalie/David,

Pegasus have been instructed to provide Landscape and Visual Impact Assessment (LVIA) services for the above project. An EIA Scoping Request has recently been submitted, for which you will shortly be asked by the Energy Consents Unit (ECU) to provide a consultation response. The Scoping Report (copy attached) sets out the proposed methodology and approach for the LVIA, including a selection of proposed viewpoints for both the day-time and night-time assessment work (page 22 and Appendix 4.1). In advance of providing a formal response to the ECU, we would be very grateful if you could confirm your acceptance to the proposed viewpoints directly to me in response to this email, in order to allow us to progress with the photography work at the earliest opportunity. If you have any comments or queries on the viewpoints proposed, we would be pleased to discuss them with you. The approach to the LVIA proposed replicates that which was previously undertaken for the Hagshaw Hill Repowering and Douglas West Extension LVIA's which were also carried out by Pegasus. With that in mind, many of the proposed viewpoint locations are common to those agreed for the earlier assessments.

Please be in touch if you would like to discuss any matters further.

Regards,  
Dale

**Dale Turner**  
Associate Environmental Planner

**Pegasus Group**  
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# Covid 19 & LPAs

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# South Lanarkshire Council

**Jessica Yanetta**

---

**From:** Dale Turner <[REDACTED]>  
**Sent:** 03 August 2020 15:22  
**To:** Wright, James  
**Cc:** Theo Philip; Lindsay Smith  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

James,

Many thanks for your prompt response.

I am happy to confirm that we would be willing to keep Loudoun Hill as an additional viewpoint in the list, even if Ruth Findlay were to come back and suggest that she was referring to a different location called 'Loundon Hill' after all (albeit that I would consider this highly unlikely, as I think she just misspelled Loudoun Hill in her response).

I trust that on that basis you would be happy to confirm your agreement to the proposed list, but please let me know if you have any further comments.

Regards,  
Dale

**Dale Turner**

Director

**Pegasus Group**

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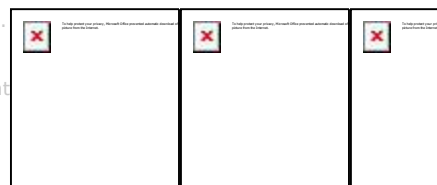
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---

**From:** Wright, James [REDACTED]  
**Sent:** 03 August 2020 14:44  
**To:** Dale Turner [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale,

I can confirm that the Council have no objection to the viewpoints as proposed in your response below. The only comment I'd raise is that the Council is content with viewpoint 18 as proposed but would reserve the right to further comment should the ECU clarify their comments with a different viewpoint.

James

---

**From:** Dale Turner [REDACTED]  
**Sent:** 03 August 2020 14:27  
**To:** Wright, James <[REDACTED]>  
**Cc:** [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

James,

Further to my recent email reply to Ruth Findlay (below) concerning her suggested amendments to the LVIA viewpoints list for Cumberhead West Wind Farm, please can you confirm whether you would be happy with the suggested updates to this list?

I would hope that there would be no reason why you would have any objections to Ruth's proposed changes, but we wanted to make sure that you were happy with the revisions as a courtesy, given they would be a change to that which was set out in the Scoping Report which you were issued.

To confirm, if agreed, the overall total of viewpoints would increase to 18, with three new locations and two revised locations.

Please be in touch if you have any questions. We are looking to finalise the list as soon as possible now to enable the photography for the viewpoints to be collected, so your early feedback would be much appreciated.

Thanks,  
Dale

**Dale Turner**  
Director

**Pegasus Group**

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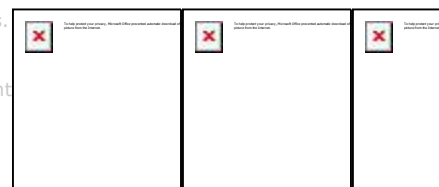
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**From:** Dale Turner  
**Sent:** 28 July 2020 15:02  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Ruth,

Thank you for your comments on the proposed viewpoints list for Cumberhead West Wind Farm.

Please find our response to each of your queries below:

***‘From the ZTV Figure 4.2 of the Scoping Report, I would query the selection of VP6 - B7068, leaving Strathaven. A common viewpoint that is used in Strathaven is the war memorial. I would request that this viewpoint is considered and would welcome comments from the Council’.***

We would be happy to change this VP location to the War Memorial, assuming this change will be acceptable to South Lanarkshire Council.

***‘Is there a suitable viewpoint from Sandford or nearby to assess the impact on this settlement? I may have missed it within the scoping report, though I am not sure on the reason for selecting VP 4 and VP5’.***

VPs 4 and 5 both cover local roads/properties/character in the area to the north of the site. However, we would be happy to change the location of VP5 to School Road in Sandford, again assuming that this change will be acceptable to South Lanarkshire Council.

***‘Hyndford Bridge and Cairn Kinney are two other viewpoints I would request are considered’.***

We are happy to include both of these locations into the list of viewpoints.

***‘In addition, it is not clear from the ZTV if Loudoun Hill is a suitable viewpoint that is worth considering’.***

We assume that you are referring to Loudoun Hill near Darvel, which is on the edge of the ZTV, but would have views of a number of the turbines. We are happy to include this location into the list of viewpoints.

The overall total of viewpoints would therefore increase to 18, with three new locations and two revised locations. These changes are summarised below.

ID	Proposed Viewpoint	Easting	Northing
1	Coalburn, Muirburn Place	281160	635512
2	M74 Overbridge	284424	635419
3	Lesmahagow-Hillcrest	281623	638622
4	Minor road, Brackenridge	276578	639692
5	<del>B7086, bridge crossing Kype Water</del> Sandford, School Road	<del>275027</del> 272040	<del>641626</del> 643087
6	<del>B7068, leaving Strathaven</del> -Strathaven, War Memorial	<del>270787</del> 270448	<del>643872</del> 644635
7	A71, bridge crossing Calder Water	266379	641900
8	Black Hill	283198	643552
9	A70 Rigside	287708	635192
10	Tinto Hill	295316	634372
11	Douglas-Hill Street	283575	631020
12	Auchensaugh hill	285330	627198

ID	Proposed Viewpoint	Easting	Northing
13	Victory Park, Muirkirk	269388	627320
14	Nether Wellwood (A70)	264483	625095
15	Cairn Table	272410	624235
16	Cairn Kinney	278468	621429
17	Hyndford Bridge	291488	641453
18	Loudoun Hill	260869	637928

We would be grateful for your confirmation that you would be happy for us to proceed on the basis of the updated list set out above, subject to confirmation of this also being agreeable to the Council.

For your information, I have attached the confirmation from SNH that they had no further requests for additional viewpoints.

Regards,  
Dale

**Dale Turner**  
Director

**Pegasus Group**

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# Covid 19 & LPAs

## Self Contingency Measu

**From:** [REDACTED]  
**Sent:** 13 July 2020 17:58  
**To:** Dale Turner [REDACTED]  
**Cc:** [REDACTED]  
 [REDACTED]

**Subject:** RE: Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dale,

Further to your email below I can provide the following initial comments on the proposed viewpoints for the proposed Cumberhead West Wind Farm.

The comments from South Lanarkshire Council, East Ayrshire Council and SNH are important in agreeing the viewpoints for assessment. Therefore I have copied in all parties for their consideration of these comments from ECU.

Although the viewpoints use similar locations to that of Hagshaw Hill Repowering and Douglas West Extension it is acknowledged that the proposed Cumberhead West extends wind farm development to the north west.

From the ZTV Figure 4.2 of the Scoping Report, I would query the selection of VP6 - B7068, leaving Strathaven. A common viewpoint that is used in Strathaven is the war memorial. I would request that this viewpoint is considered and would welcome comments from the Council.

Is there a suitable viewpoint from Sandford or nearby to assess the impact on this settlement? I may have missed it within the scoping report, though I am not sure on the reason for selecting VP 4 and VP5.

Hyndford Bridge and Cairn Kinney are two other viewpoints I would request are considered.

In addition, it is not clear from the ZTV if Loundon Hill is a suitable viewpoint that is worth considering.

I trust these comments are useful at this stage and the final viewpoint list can be agreed in due course.

Kind regards  
Ruth

**Ruth Findlay | Team Leader | Energy Consents Unit**  
The Scottish Government [REDACTED]

---

**From:** Dale Turner [REDACTED]  
**Sent:** 22 June 2020 15:16  
**To:** Findlay RF (Ruth) [REDACTED]  
**Cc:** Brian Denney [REDACTED]  
**Subject:** Cumberhead West Wind Farm – Landscape and Visual Impact Assessment

Dear Ruth,

Pegasus have been instructed to provide Landscape and Visual Impact Assessment (LVIA) services for the above project, where an EIA Scoping Request has recently been submitted to the Energy Consents Unit (ECU). The Scoping Report (copy attached) sets out the proposed methodology and approach for the LVIA, including a selection of proposed viewpoints for both the day-time and night-time assessment work (page 22 and Appendix 4.1). In advance of providing a formal response, we would be very grateful if you could confirm your acceptance to the proposed viewpoints directly to me in response to this email, in order to allow us to progress with the photography work at the earliest opportunity. If you have any comments or queries on the viewpoints proposed, we would be pleased to discuss them with you. The approach to the LVIA proposed replicates that which was previously undertaken for the Hagshaw Hill Repowering and Douglas West Extension LVIAs which were also carried out by Pegasus. With that in mind, many of the proposed viewpoint locations are common to those agreed for the earlier assessments.

Please be in touch if you would like to discuss any matters further.



Regards,  
Dale

**Dale Turner**  
Associate Environmental Planner

**Pegasus Group**  
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# Covid 19 & LPAs

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# NOISE

South Lanarkshire Council

**Sarah Tullie**

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**Subject:** RE: Cumberhead West noise assessment

----- Forwarded message -----

From: **Ian Bennett** [REDACTED]

Date: Tue, 14 Jul 2020 at 15:33

Subject: Cumberhead West noise assessment

To: Joyes, Kenny <[REDACTED]>

Hi Kenny

Thank you for the very helpful phone conversation earlier today. As agreed, this email is to summarise the main points we discussed.

- (1) I understand that the Scoping Report has not reached you yet, and therefore attach a copy for your convenience.
- (2) We agree that it would be impracticable to conduct any background sound level surveys for the Cumberhead West project: the presence of numerous large turbines would affect the measured levels and this would contravene ETSU-R-97 guidance and the IoA Good Practice Guide.
- (3) Moreover, the current Covid-19 restrictions also mean (a) we might not be allowed to undertake a new measurement campaign and (b) the background levels measured would likely be too low to be properly representative anyway .
- (4) We will use whatever background data we have available for previous projects in the Hagshaw Cluster area, even though the nearest properties surveyed were several km from the nearest Cumberhead West noise-sensitive properties.
- (5) We propose the use of the lowest set of background levels previously measured as the basis for noise limits, the most important point being that the **cumulative** limits for daytime amenity periods will be 40dB or background + 5dB, whichever is the higher (but 43dB at night, and 45dB for financially involved properties).

Regards Ian Bennett

*Partner*

[ACIA Engineering Acoustics, 39 Garners Lane, Stockport SK3 8SD](#)  
[REDACTED]

# ARCHAEOLOGY & CULTURAL HERITAGE

Historic Environment Scotland

## George Mudie

---

**From:** Alison Baisden [REDACTED]  
**Sent:** 03 August 2020 11:30  
**To:** [REDACTED]; Laura Denholm  
**Cc:** jturner; [REDACTED]; Lindsay Smith  
**Subject:** RE: Cumberhead West Wind Farm, South Lanarkshire

Hi George,

That sounds helpful. Looking forward to reviewing an EIA in due course.

Best,

Alison

**Alison Baisden MRTPI | Senior Casework Officer | Heritage Directorate | Casework Team**

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**From:** George Mudie [REDACTED]  
**Sent:** 03 August 2020 11:16  
**To:** Alison Baisden [REDACTED]

**Subject:** Re: Cumberhead West Wind Farm, South Lanarkshire

thanks Alison,

that vp appears to be close to the only spot I could find on Braxfield Road from where there is a view, albeit not especially useful, across the valley. I have recommended that we use a photograph and wireline from my selected location, which is a little way further southeast along the lane, where there is a clearer view that does not include the house and cars that conveniently 'hide' the open view in the example you provide.

Thanks for clarifying.

George

On 03/08/2020 09:32, Alison Baisden wrote:

Hi George,

Many thanks for your message (28 July 2020) regarding our recent EIA scoping response for the Cumberhead West wind farm. In order to understand the potential for impacts on the setting of New Lanark World Heritage Site and associated Inventory Designed Landscape, we have suggested including a visualisation from Braxfield Road. In order to help with this, please find attached LVIA VP06 submitted in support of recent proposals for the Broken Cross Wind Farm in South Lanarkshire (South Lanarkshire Council Ref: P/19/1636). We suggest including a visualisation from a similar location in support of the Cumberhead West proposals.

I can also confirm that we would be content with the submission of a wireline visualisation demonstrating that there would be no visibility of the proposals from this location.

I hope that this is helpful to you, and am happy to assist with any further questions,

Many thanks,

Alison

**Alison Baisden MRTPI | Senior Casework Officer | Heritage Directorate | Casework Team**

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**From:** George Mudie [REDACTED]

**Sent:** 28 July 2020 16:13

**To:** Laura Denholm [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Cumberhead West Wind Farm, South Lanarkshire

good morning Alison,

I have been looking over your consultation letter and have a couple of points that I'd like your clarification on.

Firstly, in your letter, you request a visualisation from Braxfield Road, but have not specified a location. Having looked on Google Streetview to identify a possibly useful viewpoint I am unable to

find a location along the route to the WHS that, in my opinion, has any sensitivity as a 3rd place viewpoint where there is a view over the New Lanark Mill site. The streetscape is either dominated by housing or there are trees lining the road, obscuring views when approaching the car park. Can you please advise on the location that you had in mind when making your recommendation, and offer some advice as to why this viewpoint is important?

Secondly, you recommended a visualisation from the Corra Linn, Bonnington Pavilion viewpoint. Having looked at the ZTV, I can advise that there is no predicted visibility from the viewing Pavilion. Would you still want a visualisation from that viewpoint and if so would a wireline be sufficient?

To help you respond to my queries, I attach two zoomed in draft plans: one shows the whole of the WHS (purple line) with the ZTV overlain (yellow, is the highest level of theoretical visibility; red; blue; green, is the lowest. The outlines of the GDL (green line) and CA (blue) also shown along with SMs and LBs. The other shows a more zoomed in location with the Bonnington Pavilion (LB 13065) labelled. Also attached is a transparency wireline from the Bonnington Pavilion viewpoint, clearly showing the proposed development to be hidden well behind and below the skyline.

If you could respond to the above queries, and provide some clarification based on the attachments, at your earliest convenience it would be much appreciated so that we can arrange for the necessary visualisations to be prepared in time for submission of the application.

thanks,

George

On 23/07/2020 09:38, Laura Denholm wrote:

Laura  
Laura Denholm | Business Support Officer - Casework Technician  
| Heritage Directorate  
Historic Environment Scotland | Àrainneachd Eachdraidheil Alba  
Longmore House, Salisbury Place, Edinburgh, EH9 1SH



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**George Mudie**



**For CFA Archaeology Ltd**

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Main  | [www.cfa-archaeology.co.uk](http://www.cfa-archaeology.co.uk)

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**George Mudie**



**For CFA Archaeology Ltd**

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**By email to:**

[REDACTED]

Mr George Mudie  
CFA Archaeology Ltd  
Old Engine House  
Eskmills Park  
Musselburgh  
EH21 7PQ

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

[REDACTED]  
[REDACTED]

Your ref: CWWF/250620/GM/01  
Our case ID: 300025642

23 July 2020

Dear Mr Mudie

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)  
[Cumberhead West Wind Farm, South Lanarkshire](#)  
[Pre-Application Advice Request](#)

Thank you for your request for pre-application advice (letter: 25 June 2020) regarding the Cumberhead West Wind Farm proposals, South Lanarkshire. We have reviewed this, alongside the draft EIA Scoping Report (June 2020) submitted, for our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The West of Scotland Archaeology Service (WoSAS) will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

### **Proposed Development**

We understand that the proposals will consist of up approximately 20 wind turbines with a maximum tip height of 200m and associated infrastructure within a commercial forestry plantation over Nutberry Hill approximately 3.9km west of Coalburn, South Lanarkshire.

### **Scope of Assessment**

While we note that no heritage assets in our remit are located within the development site boundary, there are a number of such heritage assets located in the vicinity of the proposals which may be subject to setting impacts. We therefore consider that any Environmental Impact Assessment (EIA) undertaken for the proposals should include a detailed assessment of impacts on the Cultural Heritage Topic area. We recommend that this assessment is undertaken by a suitably qualified professional and meets the requirements of Scottish Planning Policy (SPP, 2014), the Historic Environment Policy for Scotland (HEPS, 2019) and associated Managing Change Guidance Notes. Further guidance can also be found in the Cultural Heritage Appendix to the EIA Handbook (SNH, HES, 2018).

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[REDACTED]

We note from the EIA Scoping Report (June 2020) that it is proposed to [REDACTED] on the setting of heritage assets located within 10km of the proposals. While we are broadly content with this, we recommend that an assessment should also give consideration to the potential for impacts on the Outstanding Universal Value (OUV) of the New Lanark World Heritage Site located 12km north east of the proposals. Our Managing Change guidance note on World Heritage (2016) may be particularly helpful in this regard. Similarly, it is our view that impacts on the setting of the Falls of Clyde Inventory Designed Landscape (GDL358) should be considered. In each case, we could expect an assessment to clearly demonstrate where potential impacts have been reduced or avoided and, also, to consider where any residual effects may occur.

In addition, we [REDACTED] that impacts on [REDACTED] assets should be assessed using photomontage and wireframe visualisations where impacts are likely to be highest. Finally, we note the potential for cumulative impacts on the setting of heritage assets caused by the proposed development in combination with other existing, proposed and consented wind farms in the surrounding area. We would therefore recommend that cumulative impacts are assessed and examined through the use of cumulative visualisations.

### **Visualisation Viewpoints (Letter: 25 June 2020)**

We note that it is proposed to include visualisations of the proposed development from Cairn Table, two cairns (Scheduled Monument, Index no. 4631), Dungavel Hill, Cairn (Scheduled Monument, Index no. 2848) and Black Hill, fort & cairn (Scheduled Monument, index no.2882). In addition to these views, we also recommend that visualisations are provided showing the proposals from the New Lanark World Heritage Site (WHS). In particular, we suggest including a visualisation showing the proposals in views across the WHS from Braxfield Road. We also recommend that a visualisation is provided from the Corra Linn, Bonnington Pavilion (Category A listed building, LB13065) located within the WHS.

### **Draft EIA Scoping Report (June 2020)**

We have reviewed the EIA Scoping Report (June 2020) and, subject to our comments above, are broadly content with the approach to assessing impacts on our interests included at Section 7 (Archaeology and Cultural Heritage).

### **Further information**

A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1<sup>st</sup> May 2019, which replaces the Historic Environment Scotland Policy Statement (HESPS, 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and



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guidance. This includes our Managing Change in the Historic Environment Guidelines and Notes. All of these documents are available online at [www.historicenvironment.scot/heps](http://www.historicenvironment.scot/heps).

Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). This is available online at <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0>

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on [REDACTED] or by email on [REDACTED]

Yours sincerely

**Historic Environment Scotland**

# HYDROLOGY, HYDROGEOLOGY & GEOLOGY

Scottish Environment Protection Agency

Our ref: PCS/172793

Your ref:

If emailing, please mark  
FAO: Peter Minting

16 September 2020

Joyce Melrose  
Energy Consents Unit  
The Scottish Government

By email only to: [REDACTED]

Dear Madam

**Electricity Act 1989  
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
Cumberhead West Wind Farm - Scoping Opinion**

We previously responded to a scoping opinion request for this proposal and recommend that this letter is read in conjunction with our earlier correspondence (our ref: PCS/172073, dated 28 July 2020). We have subsequently received additional information from the applicant and we have provided **updated comments in Section 1.1 below**.

**Advice to the planning authority**

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. **As previously stated, to avoid delay and potential objection**, the information below and in the attached appendix must be submitted in support of the application.

- a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications.
- b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.
- c) Map and assessment of impacts upon groundwater abstractions and buffers.
- d) Peat depth survey and table detailing re-use proposals.

- e) Map and table detailing forest removal.
- f) Map and site layout of borrow pits.
- g) Schedule of mitigation including pollution prevention measures.
- h) Borrow Pit Site Management Plan of pollution prevention measures.
- i) Map of proposed waste water drainage layout.
- j) Map of proposed surface water drainage layout.
- k) Map of proposed water abstractions including details of the proposed operating regime.
- l) Decommissioning statement.

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide **updated** site specific comments in the following section, which should help the developer to focus the scope of the assessment.

## **1. Site specific comments**

- 1.1 We previously advised (our ref: PCS/172073) that the locations for some of the turbines and associated infrastructure might need to be modified, as they were likely to be on deep peat. Additional information submitted by the applicant has now satisfied our concerns in this regard. The updated layout shows that Turbine 20 and the substation/control room will be relocated away from deep peat, which should help to reduce the amount of peat excavation. The applicant has also stated that further peat probing will be undertaken as part of work to finalise the track routes and position of Turbine 17. We are in agreement with this approach and consider the updated layout acceptable, pending the results of further probing and submission of a detailed peat management plan.

## **Regulatory advice for the applicant**

### **2. Regulatory requirements**

- 2.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 2.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 2.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:
  - is more than 4 hectares,
  - is in excess of 5km, or
  - includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°



See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

- 2.4 Below these thresholds you will need to comply with [CAR General Binding Rule 10](#) which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.
- 2.5 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website or by contacting [waterpermitting@sepa.org.uk](mailto:waterpermitting@sepa.org.uk) or [wastepermitting@sepa.org.uk](mailto:wastepermitting@sepa.org.uk).

If you have any queries relating to this letter, please contact me via e-mail at;

[REDACTED]

Yours faithfully

Peter Minting  
Planning Officer  
Planning Service

ECopy to: Energy Consents Unit; [REDACTED]

David Gemmell, 3REnergy; [REDACTED]

*Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).*

## Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

### 1. Site layout

1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

### 2. Engineering activities which may have adverse effects on the water environment

2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:

- a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
- b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.
- c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

2.3 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

- 2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

### **3. Disturbance and re-use of excavated peat and other carbon rich soils**

- 3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO<sub>2</sub> to the atmosphere. Developments must aim to minimise this release."
- 3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO<sub>2</sub> and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.
- 3.3 The submission must include:
- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
  - b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.
- 3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).
- 3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.
- 3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

### **4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)**

- 4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

4.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

## **5. Existing groundwater abstractions**

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

## **6. Forest removal and forest waste**

6.1 Key holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.

6.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:

- a) A map demarcating the areas to be subject to different felling techniques.
- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

## 7. Borrow pits

- 7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.
- 7.2 In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:
- a) A map showing the location, size, depths and dimensions.
  - b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
  - c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
  - d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
  - e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
  - f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
  - g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
  - h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government’s [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO<sub>2</sub>.
  - i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.

- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

## **8. Pollution prevention and environmental management**

- 8.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention \(GPPs\)](#).

## **9. Life extension, repowering and decommissioning**

- 9.1 Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.
- 9.2 The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

## Sarah Tullie

---

**From:** David Gemmell [REDACTED]  
**Sent:** 27 August 2020 12:24  
**To:** [REDACTED]  
**Cc:** Jenny Hazzard; Theo Philip  
**Subject:** FW: PCS/172073 Cumberhead Wind Farm Submissions  
**Attachments:** CW\_TurbineLayoutConstraints&Peat\_200826.pdf

Hi Brian,

Thanks for your comments below relating to our Phase 1a peat probing which we've taken on board during our Phase 1b peat probing undertaken earlier in August. As you'll see from the attached Phase 1a/1b peat probing contours we've repositioned a number of turbine and other infrastructure locations with a view to avoiding deeper areas of peat.

Phase 2 peat probing will be commenced next week where we'll target new access tracks and other infrastructure not previously probed (ie T17).

We trust this approach is agreeable and will keep you in the loop with regard to Phase 2 peat probing findings to ensure data gaps are minimised.

**David Gemmell**  
**3R Energy**  
Lanark Auction Market  
Hyndford Road  
Lanark  
ML11 9AX

T: [REDACTED]  
[REDACTED]

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**From:** Fotheringham, Brian [REDACTED]  
**Sent:** 21 July 2020 14:08  
**To:** 'Jenny Hazzard' [REDACTED]  
**Subject:** FW: PCS/172073 Cumberhead Wind Farm Submissions

Hi Jenny/Theo,

The initial feedback I have received from ecology colleagues is that the initial peat survey is insufficient, as you have only provided probe data around 14 of the 20 proposed turbines, despite a statement claiming that the stage 1 survey focused on the probing for peat in the vicinity of [all] the turbines.

The guidance referred to in the draft technical note and that you plan to use for stage 2 surveys suggests a grid of 100x100 for the whole site, which would allow peat presence at the site to feed into the various layout iterations.

We are slightly concerned that to us it initially looks like you have designed the site then checked for the presence of the peat as an afterthought. Also the fact that much of the site is on commercial forestry, with historical disturbance of peat, along with dense forestry hindering survey as an issue is not really a valid reason for not doing the survey work. We do accept that although this makes surveying difficult my colleagues advise your me all you have to do is follow a GPS and probe when it tells you, sorry if that sounds too simplistic.

Also when the first rotation of this forestry was planted we think it is unlikely they paid much attention to the depth of peat and planted the whole site regardless so the fact that it is a commercial plantation is no guarantee that there is not more deep peat. Further to this as part of the desk study you mention that '*Due to the dense forestry, a review of modern aerial photography has not revealed any additional information in respect of potential peat distribution and characteristics.*' However, from a quick look on GIS/google maps, it was clear to my colleagues that the commercial plantation in the north of the site near T20 and the Birkenhead Burn has failed and therefore likely has very deep peat. We are not convinced that at this stage the peat depths have had a significant bearing on the initial lay out plan created and more justification requires to be provided to assure us how it was put together.

Notwithstanding the above views we are willing to accept that you we could allow you to continue to stage 2 surveys with the following caveats.

We acknowledge and accept that there are likely to be other overriding factors governing the locations selected for the turbines however as you haven't surveyed the whole of the site for peat then from our point of view any site on deep peat (>0.5m) should be moved to an area with less peat and this approach is always promoted to try to leave as much peat in the ground as possible, unless you subsequently are able to provide valid reasons or can offer adequate mitigation in these areas.

We are in essence taking a view that all the blank areas on the peat probe map, within the application boundary, are potential sites for turbine sites that aren't located on peat, we hope that statement makes sense?

So our initial impressions on the layout are;

- Rethink locations / remove T20 and T19 as both likely on very deep peat and their construction will result in large amounts of wet peat unsuitable for reuse on site.
- Think about moving turbines T11 and T12 as they are on deep peat.
- Alternative locations, beyond micro siting, for the turbines (T1,2,4,5 and 8) and new associated tracks, that were not probed in stage 1, **IF** deep peat found unless can prove no other location is suitable.
- Alternative locations for substation unless can prove no other location suitable.
- Alternative location for temporary compound unless of floating construction.
- Phase 2 peat probing needs to be as per 'Guidance on Developments on Peatland - Site Surveys (2017)' with detailed survey on a 10m by 10m grid basis around the centre of each proposed turbine base or other infrastructure including borrow pits and proposed temporary storage sites. This needs to take account of potential micro-siting limits and is beyond the proposed 'every 10 m out to 50 m from the centre, in four directions (N, S, E, W)'

As you can see we have highlighted a number of concerns arising from the approach taken in Stage 1 and although we are not insisting that you repeat this exercise we are clearly advising what is required at Stage 2 and the inherent risks that could arise further down the line, particularly if deep peat is encountered. We have also offered advice on the potential need to rethink the locations currently chosen for some of the turbines and the associated site infrastructure.

Hope this information is helpful and look forward to hearing from you in due course.

Thanks  
Brian

Brian Fotheringham  
Senior Planning Officer  
Planning SW



ASB  
Eurocentral  
Holytown  
North Lanarkshire  
ML1 4WQ  
Tel no [REDACTED]  
[REDACTED]

Please note my working arrangements are Mondays and Tuesdays and alternate Wednesdays

#### Telephones

Due to the current Coronavirus outbreak and in line with government guidance members of SEPA's South West planning service are now home working. Please do not leave a telephone message as we will not be able to answer it but you can email [planning.sw@sepa.org.uk](mailto:planning.sw@sepa.org.uk) and we will respond where possible by email.

## Sarah Tullie

---

**From:** Jenny Hazzard  
**Sent:** 09 July 2020 17:26  
**To:** Fotheringham, Brian  
**Cc:** 'Theo Philip'  
**Subject:** RE: Cumberhead West Wind Farm  
**Attachments:** 20200709 - 2694 Cumberhead - Draft SEPA Technical Note on Peat Stage 2\_V1.0.pdf; CW Figure 1 Site Location Plan v0.2.pdf; Peat\_Probe\_Locations.pdf

Hi Brian –

I hope this finds you well?

Following on from the exchange below, please see attached the peat strategy note mentioned by Theo, with accompanying figures showing the current site layout (subject to ongoing design iteration) and the initial findings from Stage 1 survey work.

Would it be possible to schedule a brief call to run through this, either next Tuesday morning (14<sup>th</sup> July) or the following Tuesday early afternoon (21<sup>st</sup>)? We are happy with MS Teams, or can provide a conf call number if preferred.

Many thanks,  
Jenny

**Jenny Hazzard | Environmental Planning Director | ITPEnergised**

Mobile: [REDACTED]  
4<sup>th</sup> Floor, Centrum House, 108-114 Dundas Street, Edinburgh EH3 5DQ  
[www.itpenergised.com](http://www.itpenergised.com)

**Please note our change of Edinburgh address as of 1<sup>st</sup> July 2020.**

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**From:** Fotheringham, Brian [REDACTED]  
**Sent:** 07 July 2020 08:21  
**To:** 'Theo Philip' <[REDACTED]>  
**Subject:** RE: Cumberhead West Wind Farm

Hi Theo,

Just to confirm that this case has been assigned to me, I should have known it would be 😊

As you have indicated below it would in the first instance be helpful for us to have an opportunity to review the peat strategy note and thereafter we can decide the best way forward and if that requires us to arrange a telecon with the appropriate persons then that is what I'll do.

We are soon to trial 'microsoft teams' and it is hoped that in a few weeks these kind of group discussions may be easier to arrange.

Cheers  
Brian

Nb

My working arrangements have changed as I now work Mon/Tues and every other Wednesday

---

**From:** Theo Philip [REDACTED]  
**Sent:** 06 July 2020 12:00  
**To:** Fotheringham, Brian <[REDACTED]>  
[REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm


Yes, no problem. We haven't gone into too much detail about peat in the Scoping Report, other than to say that peat depth surveys will be undertaken to inform design but I am having a peat strategy note prepared which we will issue to you later this week to set out more detail on how we propose to approach the peat depth survey. It is a large site that is fully forested with significant road infrastructure that we propose to reuse, so we are keen to speak to your team about a proportionate approach to the fieldwork. Jenny (copied) or I will be back in touch later in the week.

Thanks,  
Theo

**Theo Philip**  
**3R Energy**  
Lanark Auction Market  
Hyndford Road  
Lanark  
ML11 9AX

T: [REDACTED]  
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**From:** Fotheringham, Brian <[REDACTED]>  
**Sent:** 06 July 2020 10:22  
**To:** Theo Philip [REDACTED]  
**Subject:** RE: Cumberhead West Wind Farm

Hello Theo,

Thanks for your email in respect of the above site and I would confirm that the Energy Consents Unit have also just consulted on this proposed scheme. We will get this one uploaded into our planning casework system later today and then it will be assigned to one of the planning team. I would confirm that your email will be included in the planning submissions and I'm sure the case officer will thereafter be in touch to discuss the peat issues at the site. They may however want to wait until they have had a chance to review the content of the scoping report and to discuss their findings with the local team and our ecologists.

Regards,  
Brian

Brian Fotheringham  
Senior Planning Officer  
Planning SW  
ASB  
Eurocentral  
Holytown  
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ML1 4WQ  
Tel no [REDACTED]  
[REDACTED]

Please note my working arrangements are Mondays and Tuesdays and alternate Wednesdays

#### Telephones

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**From:** Theo Philip <[REDACTED]>  
**Sent:** 02 July 2020 15:09  
**To:** Fotheringham, Brian <[REDACTED]>  
**Subject:** RE: Cumberhead West Wind Farm

Hi Brian,

Was wondering if I could have a word on a new wind farm project we have just submitted to scoping with ECU (see attached). Similar part of the world to our previous projects but we have encountered some peat on this site that would be good to speak to you about. I was keen to see if we could arrange a call with you and your peat experts to chat through proposed scope of fieldwork in parallel with formal EIA Scoping exercise. I will send a note on proposed peat survey work in advance but I was keen to try and get a date in the diary for a couple of weeks' time. Is that something you could help facilitate please?


Thanks,  
Theo

**Theo Philip**  
**3R Energy**  
Lanark Auction Market  
Hyndford Road  
Lanark  
ML11 9AX

T: [REDACTED]  
[REDACTED]

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Brian Fotheringham  
Scottish Environment Protection Agency  
Angus Smith Building  
6 Parklands Avenue, Maxim Business Park  
Eurocentral, Holytown  
North Lanarkshire  
ML1 4WQ

By email: [REDACTED]

9<sup>th</sup> July 2020

Dear Brian

#### CUMBERHEAD WEST WIND FARM

I am getting in touch with respect to the proposed Cumberhead West Wind Farm development being progressed by 3R Energy and ScottishPower Renewables.

A Scoping Report was submitted to the Energy Consents Unit in June, and you and/or your colleagues will no doubt be sent that for review and comment, if not already.

However, given programme pressure to progress with Stage 2 peat survey work, I am hoping to engage directly with you to update you on the approach to, and outline findings from, Stage 1, and the proposed approach to Stage 2.

The proposed development comprises around 20 wind turbines and associated infrastructure in the Cumberhead Forest (commercial coniferous plantation). An initial proposed site layout plan is attached, noting that the site layout and design remains subject to ongoing iteration.

#### Desk Study

A desk study had been undertaken to establish the potential for, and possible distribution of, significant peat deposits at the site. A brief summary of findings is noted below:

- The SNH Carbon and Peatlands Map 2016 shows an area of Class 1 peat in the southwest part of the site, at Nutberry Hill, essentially coincident with the unforested land at this location. No other Class 1 or Class 2 peat is shown within the site boundary, however extensive Class 1 peat is shown adjacent to west/northwest of the site.
- BGS geological mapping shows much of the site area to be underlain by peat deposits. The northeast site area around Standingstone Hill and Tod Law are indicated to potentially be free of peat (superficial deposits comprising till), and localised areas around watercourses, including the River Nethan valley at the southeast site boundary, are also indicated to be underlain by till and/or alluvium, with no mapped peat.
- Apart from the Nutberry Hill area noted above, essentially the entire site is given over to coniferous plantation forestry of varying stages of maturity (some recently felled areas), with forestry tracks and rides. It is therefore anticipated that peat deposits, where present, will have been disturbed by forestry planting and management. Due to the dense forestry, a review of modern aerial photography has not revealed any additional information in respect of potential peat distribution and characteristics.
- Ecological survey work undertaken to date has identified much of the site, as expected, being coniferous plantation forestry. The habitat of the unforested Nutberry Hill area in the southwest is identified as being blanket bog. A second localised area of blanket bog is present in the northeast

of the site, north of the Birkhenhead Burn. Localised areas of marshy grassland, wet modified bog, and heath were also identified at the site, although largely confined to forestry breaks, track edges, and the banks of watercourses.

Based on the above, it is reasonable to assume that peat is present (at varying depths) across much of the site, although likely to have been substantially disturbed by forestry activities.

#### Stage 1 Peat Survey – Findings

Stage 1 peat survey work has been undertaken by AECOM, to establish the presence and broad distribution/ depth of peat deposits across the site, and to develop a strategy for minimising the development impact.

Due to the likelihood of substantial historical peat disturbance at the site, the considerable physical restrictions on accessing areas of dense forestry, the re-use of substantial existing forest road infrastructure, and the established technical and environmental constraints (unrelated to peat) guiding the layout iteration process, it was considered appropriate to focus Stage 1 peat survey work on the vicinity of the proposed turbine and any new infrastructure locations. The site survey work also took into account the visible shallow peat edges to existing forestry roads and borrow pits.

The results of the Phase 1 works are shown on the attached figure and range from peaty soils (<0.5 m depth) and thin acrotelmic peat overlying thin soils and weathered rock, to thicker areas of acrotelmic peat and catotelmic peat, up to 2.0m thickness on average. Some areas of locally deeper peat (>2.0 m thick) were found in the investigations at the proposed substation and temporary construction compound locations, and T20 in the north of the site.

This initial study has shown that the proposed turbine and infrastructure locations are, in the main, practical and make the most of the existing forest roads that service the site. As a result of this phase 1 study, siting of the substation, central construction compound and T20 in particular will be reviewed, along with some localised micro-siting of other infrastructure elements to minimise interaction with areas of deeper peat.

#### Stage 2 Peat Survey – Proposed Approach

Based on the Stage 1 findings, it is proposed to carry out Stage 2 peat survey works in line *Guidance on Developments on Peatland - Site Surveys (2017)*. Peat probing will focus on enhancing the current data in the vicinity of turbine, substation, site compound and access road locations. Where the phase 1 study at turbine locations has indicated variations in the peat depth, further probing will be carried out to follow any thinner peat in the vicinity to see if further micro-siting can be done to minimise the requirement for disturbance and excavation of deep peat.

Phase 2 survey work will, have the aim of enhancing the understanding of peat depth, distribution and characteristics in the vicinity of a revised infrastructure layout (following adjustments informed by Stage 1 findings), and informing options for any further micro-siting to avoid any remaining areas of deeper peat if possible. This will inform the finalised design and support efforts to minimise peat excavation.

The following details the proposed approach to Phase 2 survey work:

- **Turbines:**
  - Probe to measure peat depth at the proposed turbine centre, with additional probes every 10 m out to 50 m from the centre, in four directions (N, S, E, W).
  - Auger at turbine centre to obtain sample(s) for lab testing as appropriate and to provide additional information on the nature of the peat at varying depths (texture, moisture content, humification) and substrate if possible.

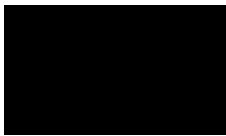
- **Crane hardstandings, substation, compound:**
  - o Where achievable depending on access (taking account of dense forestry as noted above), probe at the centre of the hardstanding/substation/compound and one at each corner (5 in total).
- **New tracks:**
  - o Where achievable depending on access (taking account of dense forestry as noted above), probes at 50m intervals along proposed track/road locations using 10m right angled offsets.
- **Borrow pits:**
  - o Where achievable depending on access (taking account of dense forestry as noted above), probe at the centre of the proposed borrow pit, plus additional probes to achieve a ~10m to 30m grid spacing depending on presence and depth of peat recorded.

Once Phase 2 probing has been completed and analysed, it is our intension to seek further engagement with SEPA to agree the final strategy for development of the site.

Summary

We hope the above provides useful information on the findings to date, proposed approach to further surveys, and how peat is being taken into account in the design iteration process. Before undertaking the Stage 2 survey works, we would be grateful for SEPA's feedback on our proposed approach.

Yours sincerely



Jenny Hazzard  
Environmental Planning Director



# TRANSPORT

South Lanarkshire Council

## Jessica Yanetta

---

**From:** Kirk, Mark ENTR [REDACTED]  
**Sent:** 11 August 2020 12:56  
**To:** Iain Lamb  
**Cc:** Jack, Fraser; Wright, James  
**Subject:** Cumberhead wind farm: scope of transport chapter of EIA report

Hi Iain,

Your email to Fraser was forwarded to me.

I have previously provided comments back to James Wright re: Scoping Opinion and my comments dated 29<sup>th</sup> July 2020 and the points you refer to below should provide a robust assessment.

Please do not hesitate to contact should you have any queries.

Kind regards

Mark

**Mark Kirk**  
**Engineering Officer - Development Management**  
**Roads and Transportation Services**  
**Community and Enterprise Resources**  
**South Lanarkshire Council**  
**Montrose House**  
**154 Montrose Crescent**  
**Hamilton, ML3 6LB**  
**Tel:** [REDACTED]  
**Email:** [REDACTED]  
**Council Website:** [www.southlanarkshire.gov.uk](http://www.southlanarkshire.gov.uk)

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---

**From:** Iain Lamb  
**Sent:** 06 August 2020 16:19:10 (UTC+00:00) Dublin, Edinburgh, Lisbon, London  
**To:** Jack, Fraser  
**Subject:** Cumberhead wind farm: scope of transport chapter of EIA report

Dear Fraser

We've been commissioned to prepare the transport chapter of the EIA report for the proposed development of the Cumberhead wind farm, located to the west of the M74 near Douglas in your Council's area. A scoping report for the project was recently submitted to the ECDU, which can be found on this link (<https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002094>) (Alternatively, you can search for case ECU00002094 on the ECDU's website if that link doesn't work). The purpose of this email is to provide more details on the scope of the transport chapter for you to respond with your views.

The site will form part of the 'Hagshaw Cluster' which includes the existing Hagshaw Hill and Douglas West wind farms and the proposed Hagshaw Hill repowering and Douglas West extension projects. The turbine blades for the Cumberhead project will be no longer than those proposed for the Hagshaw Hill repowering and Douglas West extension projects. As with both those projects, access to the proposed development will be taken from the existing private road at Junction 11 of the M74 (see here: <https://goo.gl/maps/6TC68bZuipD5RhRS9>).

The Hagshaw Hill repowering and Douglas West extension projects have recently proceeded through planning and links to their respective entries on the ECDU and SLC websites are below:

1. Hagshaw Hill repowering: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00000737>  
<https://publicaccess.southlanarkshire.gov.uk/online-applications/applicationDetails.do?keyVal=PKFZ5OOP07P00&activeTab=summary>
2. Douglas West extension: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00001836>  
<https://publicaccess.southlanarkshire.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=PQ5PP5OP07P00>

We prepared the transport chapter of the ES for both of the above projects and our email exchange below regards the scope of the Hagshaw Hill repowering project. We propose a similar scope for the Cumberhead project and I've summarised that in italics below:

### **Introduction**

1. *The Traffic and Transport chapter will assess the effects arising from the proposed development with respect to the construction and operation of the development.*
2. *It will consider all vehicle movements associated with the construction and operation of the proposed development, including consideration of construction traffic and the source of and vehicle movements associated with the delivery (and export, if required) of material and components to the site. The operational phase is likely to have little traffic impact as the proposed development will be visited by only the occasional maintenance and inspection vehicle. The decommissioning phase is too far in the future to be considered at present and will therefore not be included in the assessment.*

### **Baseline Description**

3. *The baseline will be informed by site visits and collection of data. The transport network around the proposed development will be visited and any potentially sensitive receptors will be identified. Data on traffic flows and accidents will be obtained for the roads likely to experience an increase in traffic arising from the proposed development.*

### **Relevant Guidance**

4. *The methodology will principally follow the 'Guidelines for the Environmental Impact of Road Traffic' prepared by the Institute of Environmental Assessment.*
5. *The impact of the traffic estimated to be generated by the proposed development on the surrounding road network will be subject to a screening process using the following two rules outlined in the Guidelines to identify the appropriate extent of the assessment area:*
  1. *Rule 1 - include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).*
  2. *Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.*
6. *The assessment of the baseline situation will determine which sections of road should be subject to which of the above rules. Where the predicted increase in traffic flows is lower than the appropriate thresholds, the Guidelines suggest the significance of effects can be stated to be low or insignificant and further detailed assessments are not warranted.*

### **Proposed Scope of Assessment**

7. *It is anticipated that the geographical scope of assessment will extend from Junctions 10 to 11 of the M74 and the B7078 around Junction 11. The turbine components are likely to be delivered from King George V dock in Glasgow via the M8 and M74 so the geographical scope of that part of the assessment will extend to cover that part of the road network and will be accompanied by swept path assessments of the vehicle carrying the turbine blade.*

### **Potential Impacts**

8. *Where the estimated increase in traffic flows is expected to be greater than the appropriate rule above, the potential impacts on the following topics will be considered in more detail:*
  3. *Severance;*

4. *Driver delay;*
5. *Pedestrian delay;*
6. *Pedestrian amenity;*
7. *Fear and intimidation; and*
8. *Accidents.*
9. *The potential for cumulative effects from other relevant developments in the study area will also be considered.*

**Potential Mitigation**

10. *Potential mitigation measures will be identified once the impacts have been assessed. These measures may include restrictions on vehicle routings and times in order to avoid or reduce impacts on sensitive receptors and 'good practice' measures to be included in a Construction Traffic Management Plan (CTMP).*

I hope that the above is sufficiently clear, but please let me know if you need any more information.

Regards

Iain

Iain Lamb

Transport Development Associate

Mob: [REDACTED]

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---

**From:** Jack, Fraser [REDACTED]  
**Sent:** 11 October 2018 22:26  
**To:** Iain Lamb [REDACTED]  
**Cc:** Laird, Stuart [REDACTED]  
**Subject:** RE: Hagshaw Hill wind farm repowering: scope of transport chapter of EIA report

Dear Iain,

Thank you for your e-mail below and apologies for the delay in replying to you.

The scope covers most of the items that we would look to be considered. Any structures along the route should also be considered along with an agreed route for construction traffic (to avoid sensitive receptors (if applicable)). Not sure from the plan whether there will be new access tracks to be constructed.

In terms of accident records, my colleague Stuart Laird may be able to advise. I have copied him into this e-mail.

Regards

**Fraser Jack**  
**Team Leader - Development Management**  
**Roads and Transportation Services**  
**Community and Enterprise Resources**  
**South Lanarkshire Council**  
**Montrose House**  
**154 Montrose Crescent**  
**Hamilton, ML3 6LB**  
**Tel:** [REDACTED]  
**Council Website:** [www.southlanarkshire.gov.uk](http://www.southlanarkshire.gov.uk)

---

**From:** Iain Lamb [REDACTED]  
**Sent:** 04 October 2018 12:09  
**To:** Jack, Fraser  
**Subject:** RE: Hagshaw Hill wind farm repowering: scope of transport chapter of EIA report

Dear Fraser

You may recall that we sent the email below a couple of months ago now and we don't seem to have received a reply. We're now preparing a draft ES chapter in line with the scope below and would be grateful for your views before we proceed too far.

Regards

Iain

---

**From:** Iain Lamb  
**Sent:** 06 August 2018 16:11  
**To:** [REDACTED]  
**Subject:** Hagshaw Hill wind farm repowering: scope of transport chapter of EIA report

Dear Fraser

As discussed, we've been commissioned to prepare the transport chapter of the EIA report for the proposed repowering of the exiting Hagshaw Hill wind farm. The indicative layout of the proposed development is shown in the attached plan. I suspect that the exact locations of the turbines will alter slightly as design work progresses but the access route (via the private road from Junction 11 of the M74) will remain the same.

We propose the following scope for the transport chapter of the EIA report:

#### **Introduction**

1. The Traffic and Transport chapter will assess the effects arising from the proposed development with respect to the construction and operation of the development.
2. It will consider all vehicle movements associated with the construction and operation of the proposed development, including consideration of construction traffic and the source of and vehicle movements associated with the delivery (and export, if required) of material and components to the site. The operational phase is likely to have little traffic impact as the proposed development will be visited by only the occasional maintenance and inspection vehicle. The decommissioning phase is too far in the future to be considered at present and will therefore not be included in the assessment.

#### **Baseline Description**

1. The baseline will be informed by site visits and collection of data. The transport network around the proposed development will be visited and any potentially sensitive receptors will be identified. Data on

traffic flows and accidents will be obtained for the roads likely to experience an increase in traffic arising from the proposed development.

### **Relevant Guidance**

1. The methodology will principally follow the 'Guidelines for the Environmental Impact of Road Traffic' prepared by the Institute of Environmental Assessment.
2. The impact of the traffic estimated to be generated by the proposed development on the surrounding road network will be subject to a screening process using the following two rules outlined in the Guidelines to identify the appropriate extent of the assessment area:
  1. Rule 1 - include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
  2. Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.
3. The assessment of the baseline situation will determine which sections of road should be subject to which of the above rules. Where the predicted increase in traffic flows is lower than the appropriate thresholds, the Guidelines suggest the significance of effects can be stated to be low or insignificant and further detailed assessments are not warranted.

### **Proposed Scope of Assessment**

1. It is anticipated that the geographical scope of assessment will extend from Junctions 10 to 13 of the M74 and the B7078 between Junctions 11 and 12 of the M74. The turbine components are likely to be delivered from King George V dock in Glasgow via the M8 and M74 so the geographical scope of that part of the assessment will extend to cover that part of the road network.

### **Potential Impacts**

1. Where the estimated increase in traffic flows is expected to be greater than the appropriate rule above, the potential impacts on the following topics will be considered in more detail:
  1. Severance;
  2. Driver delay;
  3. Pedestrian delay;
  4. Pedestrian amenity;
  5. Fear and intimidation; and
  6. Accidents.
2. The potential for cumulative effects from other relevant developments in the study area will also be considered.

### **Potential Mitigation**

1. Potential mitigation measures will be identified once the impacts have been assessed. These measures may include restrictions on vehicle routeings and times in order to avoid or reduce impacts on sensitive receptors and 'good practice' measures to be included in a Construction Traffic Management Plan (CTMP).

I hope that the above would cover everything that you would wish to see addressed in the assessment, but please let me know of any omissions or any local issues you would wish to see us address. It would be helpful if you could please provide me with contact details for someone in SLC who could comment on the accident rates on the section of the B7078 in the study area (we'd like to understand if it has atypically-high accident rates)

Regards

Iain

Iain Lamb  
Transport Development Associate

Mob: [REDACTED]

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# Transport Scotland



## Jessica Yanetta

---

**From:** [REDACTED]  
**Sent:** 11 August 2020 10:58  
**To:** Iain Lamb  
**Cc:** [REDACTED]  
**Subject:** Cumberhead wind farm (South Lanarkshire): scope of transport chapter of EIA report  
**Attachments:** Cumberhead Wind Farm Scoping TS Response July 2020 [Filed 23 Jul 2020 14:32]

Iain,  
Thank you for your email below to George Smith, and the opportunity to comment on the Scope of your Transport Chapter of the forthcoming EIAR for Cumberhead Wind Farm. I can confirm that Transport Scotland was consulted on this application by the Energy Consents Unit, and a response was issued on 23<sup>rd</sup> July 2020. I note that consultation responses have not yet been uploaded to the ECU website, therefore, I have attached the email for your information.

Kind regards,  
Lesley Logan

---

**From:** Iain Lamb <[REDACTED]>  
**Sent:** Thursday, August 6, 2020 3:18 PM  
**To:** SMITH George <[REDACTED]>  
**Subject:** Cumberhead wind farm (South Lanarkshire): scope of transport chapter of EIA report

Dear George

We've been commissioned to prepare the transport chapter of the EIA report for the proposed development of the Cumberhead wind farm, located to the west of the M74 near Douglas in South Lanarkshire Council's area. A scoping report for the project was recently submitted to the ECDU, which can be found on this link (<https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00002094>) (Alternatively, you can search for case ECU00002094 on the ECDU's website if that link doesn't work). The purpose of this email is to provide more details on the scope of the transport chapter for you to respond with your views.

The site will form part of the 'Hagshaw Cluster' which includes the existing Hagshaw Hill and Douglas West wind farms and the proposed Hagshaw Hill repowering and Douglas West extension projects. The turbine blades for the Cumberhead project will be no longer than those proposed for the Hagshaw Hill repowering and Douglas West extension project. As with both those projects, access to the proposed development will be taken from the existing private road at Junction 11 of the M74 (see here: <https://goo.gl/maps/6TC68bZuipD5RhRS9>).

The Hagshaw Hill repowering and Douglas West extension projects have recently proceeded through planning and links to their respective entries on the ECDU website are below:

- Hagshaw Hill repowering: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00000737>
- Douglas West extension: <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00001836>

We prepared the transport chapter of the ES for both of the above projects and our email exchange below regards the scope of the Hagshaw Hill repowering project. We propose a similar same scope for the Cumberhead project and I've summarised that in italics below:

### **Introduction**

- . *The Traffic and Transport chapter will assess the effects arising from the proposed development with respect to the construction and operation of the development.*
- . *It will consider all vehicle movements associated with the construction and operation of the proposed development, including consideration of construction traffic and the source of and vehicle movements associated with the delivery (and export, if required) of material and components to the site. The operational phase is likely to have little traffic impact as the proposed development will be visited by only the occasional maintenance and inspection vehicle. The decommissioning phase is too far in the future to be considered at present and will therefore not be included in the assessment.*

### **Baseline Description**

- . *The baseline will be informed by site visits and collection of data. The transport network around the proposed development will be visited and any potentially sensitive receptors will be identified. Data on traffic flows and accidents will be obtained for the roads likely to experience an increase in traffic arising from the proposed development.*

### **Relevant Guidance**

- . *The methodology will principally follow the 'Guidelines for the Environmental Impact of Road Traffic' prepared by the Institute of Environmental Assessment.*
- . *The impact of the traffic estimated to be generated by the proposed development on the surrounding road network will be subject to a screening process using the following two rules outlined in the Guidelines to identify the appropriate extent of the assessment area:*
  - *Rule 1 - include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).*
  - *Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.*
- . *The assessment of the baseline situation will determine which sections of road should be subject to which of the above rules. Where the predicted increase in traffic flows is lower than the appropriate thresholds, the Guidelines suggest the significance of effects can be stated to be low or insignificant and further detailed assessments are not warranted.*

### **Proposed Scope of Assessment**

- . *It is anticipated that the geographical scope of assessment will extend from Junctions 10 to 11 of the M74 and the B7078 around Junction 11. The turbine components are likely to be delivered from King George V dock in Glasgow via the M8 and M74 so the geographical scope of that part of the assessment will extend to cover that part of the road network and will be accompanied by swept path assessments of the vehicle carrying the turbine blade .*

### **Potential Impacts**

- . *Where the estimated increase in traffic flows is expected to be greater than the appropriate rule above, the potential impacts on the following topics will be considered in more detail:*
  - *Severance;*
  - *Driver delay;*
  - *Pedestrian delay;*
  - *Pedestrian amenity;*
  - *Fear and intimidation; and*
  - *Accidents.*
- . *The potential for cumulative effects from other relevant developments in the study area will also be considered.*

### **Potential Mitigation**

- . *Potential mitigation measures will be identified once the impacts have been assessed. These measures may include restrictions on vehicle routings and times in order to avoid or reduce impacts on sensitive receptors and 'good practice' measures to be included in a Construction Traffic Management Plan (CTMP).*

I hope that the above is sufficiently clear, but please let me know if you need any more information.

Regards

Iain

Iain Lamb

Transport Development Associate

Mob: [REDACTED]

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Regd in Scotland No. SC379909 Regd office: 30 Miller Road, Ayr, Scotland, KA7 2AY



---

**From:** SMITH George <[REDACTED]>

**Sent:** 04 October 2018 14:42

**To:** Iain Lamb [REDACTED]

**Subject:** RE: Hagshaw Hill wind farm (South Lanarkshire) repowering: scope of transport chapter of EIA report

Iain,

Many thanks for your email and the opportunity to comment on the scope of your forthcoming Environmental Impact Assessment (EIA). Please accept my apologies for the delay in responding, this was due to your email being lost in holiday traffic.

The submitted scope for the transport chapter of the EIA report is considered to be acceptable.

We understand that your client is proposing to submit a Section 36 application for the replacement of 14 of the existing 20 turbines at Hagshaw Hill Wind Farm near Douglas. The proposed turbine blade length will be around 64.5m.

We also note that the scope of your assessment will be based upon the Institute of Environmental Assessment's Guidelines for the Environmental Impact of Road Traffic, and that a swept path assessment of the turbine delivery route will be provided. Given the increase in turbine size, Transport Scotland would also seek a full abnormal load assessment be provided, which evaluates the proposed route for any abnormal loads on the trunk road network. This will require to identify any accommodation measures required, including the removal of street furniture, junction widening and any traffic management. The full abnormal load assessment need not be included within the EIA, but approval will be required prior to commencement of deliveries to site. We would also note that you should take account of the removal of the existing turbines within your assessment.

Transport Scotland will be consulted on the application by Energy Consents once the application is submitted, and we will review your Transport Chapter at that stage. In the meantime, I trust the above comments will allow you to proceed with your assessment, however, if you have any further questions please do not hesitate to contact me.

Regards

GEORGE SMITH  
Associate  
124 St Vincent Street, Glasgow, United Kingdom, G2 5HF

Direct Dial: [REDACTED]  
Main Office: [REDACTED]  
Website: [www.systra.co.uk](http://www.systra.co.uk)



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**From:** Iain Lamb [REDACTED]  
**Sent:** Thursday, October 04, 2018 12:08 PM  
**To:** GILLESPIE Jason [REDACTED]; SMITH George [REDACTED] >  
**Subject:** RE: Hagshaw Hill wind farm (South Lanarkshire) repowering: scope of transport chapter of EIA report

Dear George / Jason

We sent the email below a couple of months ago now and we don't seem to have received a reply. We're now preparing a draft ES chapter in line with the scope below and would be grateful for your views before we proceed too far.

Regards

Iain

---

**From:** Iain Lamb  
**Sent:** 06 August 2018 16:52  
**To:** 'jgillespie@systra.com' [REDACTED]  
**Subject:** Hagshaw Hill wind farm (South Lanarkshire) repowering: scope of transport chapter of EIA report

Dear George / Jason

We've been commissioned to prepare the transport chapter of the EIA report for the proposed repowering of the existing Hagshaw Hill wind farm, located to the west of the M74 near Douglas in South Lanarkshire Council's area (I'm not sure whose 'patch' this would be in hence why I'm sending to both). There is an existing wind farm of 26 turbines on the site and it is proposed that they be replaced by 14 larger turbines, with a blade length of around

64.5m. The indicative layout of the proposed development is shown in the attached plan. I suspect that the exact locations of the turbines will alter slightly as design work progresses but the access route (via the private road from Junction 11 of the M74) will remain the same.

The site is of a size that it will require a Section 36 consent from the Energy Consents Unit, the application for which will be accompanied by an EIA report. We propose the following scope for the transport chapter of the EIA report:

### **Introduction**

- . The Traffic and Transport chapter will assess the effects arising from the proposed development with respect to the construction and operation of the development.
- . It will consider all vehicle movements associated with the construction and operation of the proposed development, including consideration of construction traffic and the source of and vehicle movements associated with the delivery (and export, if required) of material and components to the site. The operational phase is likely to have little traffic impact as the proposed development will be visited by only the occasional maintenance and inspection vehicle. The decommissioning phase is too far in the future to be considered at present and will therefore not be included in the assessment.

### **Baseline Description**

- . The baseline will be informed by site visits and collection of data. The transport network around the proposed development will be visited and any potentially sensitive receptors will be identified. Data on traffic flows and accidents will be obtained for the roads likely to experience an increase in traffic arising from the proposed development.

### **Relevant Guidance**

- . The methodology will principally follow the 'Guidelines for the Environmental Impact of Road Traffic' prepared by the Institute of Environmental Assessment.
- . The impact of the traffic estimated to be generated by the proposed development on the surrounding road network will be subject to a screening process using the following two rules outlined in the Guidelines to identify the appropriate extent of the assessment area:
  - Rule 1 - include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
  - Rule 2 - Include any other specifically sensitive areas where traffic flows have increased by 10% or more.
- . The assessment of the baseline situation will determine which sections of road should be subject to which of the above rules. Where the predicted increase in traffic flows is lower than the appropriate thresholds, the Guidelines suggest the significance of effects can be stated to be low or insignificant and further detailed assessments are not warranted.

### **Proposed Scope of Assessment**

- . It is anticipated that the geographical scope of assessment will extend from Junctions 10 to 13 of the M74 and the B7078 between Junctions 11 and 12 of the M74. The turbine components are likely to be delivered from King George V dock in Glasgow via the M8 and M74 so the geographical scope of that part of the assessment will extend to cover that part of the road network and will be accompanied by swept path assessments of the vehicle carrying the turbine blade .

### **Potential Impacts**

- . Where the estimated increase in traffic flows is expected to be greater than the appropriate rule above, the potential impacts on the following topics will be considered in more detail:
  - Severance;
  - Driver delay;
  - Pedestrian delay;
  - Pedestrian amenity;
  - Fear and intimidation; and
  - Accidents.
- . The potential for cumulative effects from other relevant developments in the study area will also be considered.

**Potential Mitigation**

- . Potential mitigation measures will be identified once the impacts have been assessed. These measures may include restrictions on vehicle routeings and times in order to avoid or reduce impacts on sensitive receptors and 'good practice' measures to be included in a Construction Traffic Management Plan (CTMP).

I hope that the above would cover everything that you would wish to see addressed in the assessment, but please let me know of any omissions or any other issues you would wish to see us address.

Regards

Iain

Iain Lamb  
 Transport Development Associate  
 Mob: [REDACTED]  
 Web: [www.tranplanworld.co.uk](http://www.tranplanworld.co.uk)

Transport Planning Limited  
 Forsyth House, 93 George Street, Edinburgh, EH2 3ES  
 Also at 4 West Philpstoun Steadings, Old Philpstoun, Linlithgow, EH49 7RY Tel: [REDACTED]

Regd in Scotland No. SC379909 Regd office: Apex 2, 97 Haymarket Terrace, Edinburgh EH12 5HD



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# TELECOMMUNICATIONS

Arqiva

## Sarah Tullie

---

**From:** Wind Farm Enquiries [REDACTED] >  
**Sent:** 05 October 2020 21:28  
**To:** Jessica Yanetta  
**Cc:** Wind Farm Enquiries  
**Subject:** RE: Consultation | Cumberhead West Wind Farm, South Lanarkshire  
**Attachments:** Cumberhead West Wind Farm, South Lanarkshire.docx

Hello Jessica

Please see attached Arqiva response to your proposed development

Thanks

**Keith Waudby**  
Windfarm Impact Assesor  
Arqiva

Mobile: [REDACTED]  
Daventry, Borough Hill, Daventry. NN11 4NB  
[www.arqiva.com](http://www.arqiva.com)

---

**From:** Jessica Yanetta [REDACTED] >  
**Sent:** 25 September 2020 14:05  
**To:** Wind Farm Enquiries [REDACTED]; Wind Farm Enquiries [REDACTED] >  
**Subject:** Consultation | Cumberhead West Wind Farm, South Lanarkshire

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**From:** Jessica Yanetta  
**Sent:** 25 September 2020 14:04  
**To:** [REDACTED]  
**Subject:** Consultation | Cumberhead West Wind Farm, South Lanarkshire

Dear Sirs,

I am writing on behalf of my client, 3R Energy, with regard to a proposed 21-turbine wind energy development in South Lanarkshire.

The proposed development details are given below:

12-character UK NGR for the site centre: 275107/634361  
Search radius from the site centre: 1500m  
Site name: Cumberhead West Wind Farm  
Nearest town: Coalburn, South Lanarkshire  
Email address for reply: [REDACTED]

Details of the individual turbines are given in the table below:

Turbine	X	Y	Max Tip Height	Max Rotor Diameter
1	273972	632452	200m	155m
2	273971	633022	200m	155m
3	273762	633452	200m	155m
4	274485	632982	200m	155m
5	275075	633428	200m	155m
6	274498	633585	200m	155m
7	273914	634053	200m	155m
8	275121	633990	200m	155m
9	274592	634184	200m	155m
10	274504	634697	200m	155m
11	275175	634616	200m	155m
12	275267	635234	200m	155m
13	275843	634840	200m	155m
14	275761	634263	200m	155m
15	275885	635450	200m	155m
16	275615	635837	200m	155m
17	276400	635359	200m	155m
18	276351	634760	200m	155m
19	276192	636031	200m	155m
20	276626	634295	200m	155m
21	276762	633841	200m	155m

I would be most grateful for information on fixed wireless links and scanning telemetry links in the area, which have the potential to be affected by this development.

Please let me know if there is any further information required.

Kind regards,

Jessica

**Jessica Yanetta | EIA Consultant | ITPENERGISED**

Mobile: [REDACTED]

4<sup>th</sup> Floor | Centrum House | 108-114 Dundas Street | Edinburgh | EH3 5DQ

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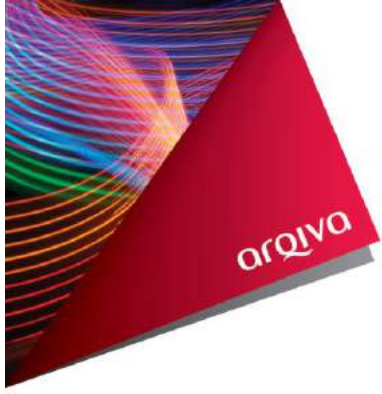
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5 October 2020

Re: Cumberhead West Wind Farm, South Lanarkshire

**Response by Arqiva**

Thank you for the opportunity to review and comment on the above development.

Arqiva is responsible for providing the BBC, ITV and the majority of the UK's radio transmission network and is responsible for ensuring the integrity of Re-Broadcast Links. Tall infrastructure such as wind turbines and other tall structures have the potential to block radio transmission links and rebroadcasting links (through direct blocking of radio signal or deflecting signal). Our radio transmission networks normally operate with a 100m buffer either side of a radio link, free from interference by tall development.

We have considered whether this development is likely to have an adverse effect on our operations and have concluded that we have no objections to this development.

If you would like to discuss this matter further, please do make contact. My email details are [windfarms@arqiva.com](mailto:windfarms@arqiva.com)

Yours faithfully  
Keith Waudby  
Arqiva  
Tel: [REDACTED]

Atkins

## Sarah Tullie

---

**From:** Jessica Yanetta  
**Sent:** 06 October 2020 15:25  
**To:** Windfarms  
**Subject:** RE: WF33380 - Cumberhead West Wind Farm, South Lanarkshire, 3R Energy, Coalburn, South Lanarkshire, T1-T21 - NS 75107 34361: Consultation | Cumberhead West Wind Farm, South Lanarkshire  
**Attachments:** Cumberhead West WF\_Dunside Telemetry Location and Proximity.pdf

Good afternoon,

Thank you for response in relation to the proposed Cumberhead West Windfarm.

I have attached a map showing the proposed turbines in proximity to the Dunside link/equipment potentially affected as mentioned in your report, and an estimation of the link (Dunside – Kilncadzow). I would be grateful if you could confirm the link estimation is accurate.

It is noted that the turbines at the operational wind farm (shown on the attached plan) are at a much closer proximity to the Dunside telemetry outstation and associated link than the proposed Cumberhead West turbines. Since there is no current interference from the operational turbines already located in the area, we would like to request that the objection to the proposed Cumberhead West Wind Farm is removed on the basis that the wind farm is located further from the aforementioned telemetry link than currently operational turbines.

If there is any more information that you require I would be happy to provide it to you.

Many thanks  
Jessica

Jessica Yanetta | **EIA Consultant** | ITP Energised  
Mobile: [REDACTED]  
4<sup>th</sup> Floor | Centrum House | 108-114 Dundas Street | Edinburgh | EH3 5DQ  
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---

**From:** Windfarms <[REDACTED]>  
**Sent:** 30 September 2020 18:25  
**To:** Jessica Yanetta [REDACTED]  
**Subject:** WF33380 - Cumberhead West Wind Farm, South Lanarkshire, 3R Energy, Coalburn, South Lanarkshire, T1-T21 - NS 75107 34361: Consultation | Cumberhead West Wind Farm, South Lanarkshire

Dear Sirs,

I am responding to an email of 25- Sep-20, regarding the above named proposed development.

The above application has now been examined in relation to UHF Radio Scanning Telemetry communications used by our Client in that region. Unfortunately, there is a risk that this proposed Wind Farm / Turbine would cause interference to communications between Outstations and a Scanning Base Station. Therefore we have no alternative than to **OBJECT** to the proposal at:

**Turbine Site Location NGR Centre grid – NS 75615 35837**  
**This objection is based on a 1800 metres radius from the Turbine Site location given above.**

**Turbine Site Location NGR Centre grid – NS 76192 36031**  
**This objection is based on a 1800 metres radius from the Turbine Site location given above.**

**The fixed link operator(s) identified in the attached Interference Report should be contacted directly if further information is required.**

Please note that this Objection is **not** in relation to any Microwave Links operated by Scottish Water.

Should any alteration be made to the above turbine locations or should you wish to discuss this matter, could I kindly ask you to get in touch with Atkins Ltd via the following email address: [REDACTED]

Many thanks.

*Atkins Limited is responsible for providing Wind Farm/Turbine support services to TAUWI*

Should any alteration be made to the above turbine locations or should you wish to discuss this matter, could I kindly ask you to get in touch with Atkins Ltd via the following email address: [REDACTED]

*Atkins Limited is responsible for providing Wind Farm/Turbine support services to the Telecommunications Association of the UK Water Industry. Web: [www.tauwi.co.uk](http://www.tauwi.co.uk)*

**Windfarm Support**

**ATKINS**

The official engineering design services provider for the London 2012 Olympic and Paralympic Games  
Web: [www.atkinsglobal.com/communications](http://www.atkinsglobal.com/communications)

---

**From:** Jessica Yanetta [REDACTED]  
**Sent:** 25 September 2020 18:37  
**To:** Windfarms [REDACTED]  
**Subject:** Consultation | Cumberhead West Wind Farm, South Lanarkshire

Dear Sirs,

I am writing on behalf of my client, 3R Energy, with regard to a proposed 21-turbine wind energy development in South Lanarkshire.



The proposed development details are given below:

12-character UK NGR for the site centre: 275107/634361

Search radius from the site centre: 1500m

Site name: Cumberhead West Wind Farm

Nearest town: Coalburn, South Lanarkshire

Email address for reply: [REDACTED]

Details of the individual turbines are given in the table below:

Turbine	X	Y	Max Tip Height	Max Rotor Diameter
1	273972	632452	200m	155m
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20	276626	634295	200m	155m
21	276762	633841	200m	155m

I would be most grateful for information on fixed wireless links and scanning telemetry links in the area, which have the potential to be affected by this development.

Please let me know if there is any further information required.

Kind regards,

Jessica

Jessica Yanetta | EIA Consultant | ITPENERGISED

Mobile: [REDACTED]

4<sup>th</sup> Floor | Centrum House | 108-114 Dundas Street | Edinburgh | EH3 5DQ

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# Joint Radio Company

## Sarah Tullie

---

**From:** JRC Windfarm Coordinations <[REDACTED]>  
**Sent:** 28 September 2020 09:57  
**To:** Jessica Yanetta  
**Subject:** Consultation | Cumberhead West Wind Farm, South Lanarkshire [WF825200]

Dear Jessica,

A Windfarms Team member has replied to your co-ordination request, reference **WF825200** with the following response:

*Dear Jessica*

**Name/Location:** Cumberhead West Wind Farm

**Site Centre/Turbine at NGR/IGR:**

Turbine X	Y	Max Tip Height	Max Rotor Diameter
1	273972 632452	200m	155m
2	273971 633022	200m	155m
3	273762 633452	200m	155m
4	274485 632982	200m	155m
5	275075 633428	200m	155m
6	274498 633585	200m	155m
7	273914 634053	200m	155m
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16	275615 635837	200m	155m
17	276400 635359	200m	155m
18	276351 634760	200m	155m
19	276192 636031	200m	155m
20	276626 634295	200m	155m
21	276762 633841	200m	155m

**Development Radius:** 0.1KM

*This proposal **cleared** with respect to radio link infrastructure operated by:*

**Scottish Power and Scotia Gas Networks**

*JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to*

*interfere with radio systems operated by utility companies in support of their regulatory operational requirements.*

*In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.*

*In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.*

*It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.*

Regards

Wind Farm Team

Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom

Office: [REDACTED]

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.*

*Registered in England & Wales: 2990041*

<http://www.jrc.co.uk/about-us>

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We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xmeeaac0kiaaam05ecqgKNufEqQ%3D%3D>

# SHADOW FLICKER

South Lanarkshire Council

## Jessica Yanetta

---

**From:** Joyes, Kenny <[REDACTED]>  
**Sent:** 27 October 2020 12:01  
**To:** Jessica Yanetta  
**Cc:** Wright, James  
**Subject:** RE: Cumberhead West Wind Farm Shadow Flicker Consultation

Good Afternoon Jessica

### **RE: Cumberhead West Wind Farm Shadow Flicker Consultation**

With respect to your proposal this service would generally agree with the approach suggested. As this is a modelling exercise I see no reason to exclude any receptors at this stage. The outcome will inform any mitigation required. As strobing is thought to result in health effects, to susceptible persons, it would be unwise to exclude any property under the influence of the shadow flicker irrespective of financial involvement.

Best Regards Kenny

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**From:** Jessica Yanetta <[REDACTED]>  
**Sent:** 22 October 2020 16:16  
**To:** Joyes, Kenny <[REDACTED]>  
**Subject:** RE: Cumberhead West Wind Farm Shadow Flicker Consultation

Good afternoon Kenny,

I hope this email finds you well.

I would like to consult with you on the topic of shadow flicker for the proposed Cumberhead West Wind Farm, for which an EIA will be submitted in the coming months.

Please see my email below to James, regarding our initial methodology for the shadow flicker assessment within the EIA Report.

We have since had confirmation from our client and the landowner that the following 4 properties (please refer to the attached plan) are financially involved in the proposed development, and are therefore seeking your agreement in excluding them from the shadow flicker assessment.

The properties are:

Logan Farm  
North Cumberhead  
Blackhill Cottage  
Broomknowe

Since there is little guidance for shadow flicker to determine how to treat financially involved properties in the assessment, we would be grateful if you could confirm our approach of excluding them from the property on the grounds of financial involvement in the development, and agreement with the landowner.

Many thanks,  
Jessica

Jessica Yanetta | EIA Consultant | ITPENERGISED

Mobile: [REDACTED]

4<sup>th</sup> Floor | Centrum House | 108-114 Dundas Street | Edinburgh | EH3 5DQ

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**From:** Jessica Yanetta

**Sent:** 06 October 2020 12:46

**To:** [REDACTED]

**Cc:** Sarah Tullie <[REDACTED]>

**Subject:** Cumberhead West Wind Farm Shadow Flicker Consultation

Dear James,

I would like to consult with you on shadow flicker for the proposed Cumberhead West wind farm.

### Shadow Flicker

The study area within which receptors could potentially be affected by shadow flicker as noted within the Update of UK Shadow Flicker Evidence Base report (DECC, 2011), is a distance of 10 rotor diameters from each turbine and 130 degrees either side of north (relative to each turbine). For the proposed Cumberhead West Wind Farm, we are assessing a maximum rotor diameter of 155m and, as such, the study area for assessment extends to 1,550m from each of the proposed turbine locations. The attached site plan details the expected study area and likely properties to fall within the assessment based on the current turbine locations. There are 11 properties or property clusters identified within the 1,550m study area (or immediately outside of) that have the potential to be affected by shadow flicker. Please note that we propose to exclude South Cumberhead property from the assessment, as it is in a state of disrepair and is considered uninhabitable.

The shadow flicker assessment will be undertaken using WindPRO computer modelling software and will be run for both a worst case scenario (365 sunshine and 100% turbine operation) and realistic scenario (using, where possible, measured meteorological data) on the potential shadow flicker occurrence for a 1m x 1m ground floor window at each receptor location facing the development. The sensitivity of the receptor will be assumed to be high in all cases for the purpose of the impact assessment, and a significant impact will be noted where a receptor is identified as experiencing greater than 30 hours of flicker a year or more than 30 minutes per day on the worst affected day, which ever if greater (DECC, 2011).

Reference to relevant guidance will be included in the assessment report.



I would be grateful if you or an appropriate colleague could confirm the above methodology to allow us to progress the impact assessment.

Kind Regards

Jessica Yanetta | EIA Consultant | ITPENERGISED

Mobile: [REDACTED]

4<sup>th</sup> Floor | Centrum House | 108-114 Dundas Street | Edinburgh | EH3 5DQ

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# FORESTRY

## Scottish Forestry

## Jessica Yanetta

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**From:** Tim Barratt [REDACTED] >  
**Sent:** 10 November 2020 19:14  
**To:** [REDACTED]  
**Subject:** RE: Cumberhead West Windfarm Consultation  
**Attachments:** Image 1 Lodge pole section.jpg; Image 2 LP & SS section.jpg; CW\_F1\_Baseline Felling\_201007-compressed.pdf; CW\_F2\_Baseline Restock\_201007-compressed.pdf; CW\_F3\_DevelopmentFelling\_201007-compressed.pdf; CW\_F4\_DevelopmentRestock\_201007-compressed.pdf; CW\_F5\_DevelopmentAreaFelling\_201007-compressed.pdf; CW\_F6\_CompensatoryPlantingObligation\_201007-compressed.pdf

Dear David and Sasha,

Further to previous discussions in relation to the proposed Cumberhead West Windfarm application, and my call with David last week, this email is to provide you both with an update on progress – attached for reference:

- Baseline felling and replanting plans,
- Windfarm felling and replanting plans,
- Windfarm development felling plan (what we will seek felling approval for through the ECU application – based on current species composition), and
- Compensatory planting plan (what we will need to deliver – based on baseline replanting plans)

One of the action points I took away from our site meeting at the end of June was to look at the crop heights along the proposed link road between T10 and T11 through the Phase 3 section of crop. Attached are a couple of images from the proposed route; the pictures very much reflect what we looked at and anticipated from the outside, i.e. a variable crop of 8m to 14m in height, with low stocking density from historical establishment issues. On this basis I am content that we discussed on site should be possible i.e. keyholing the road line through the existing crop without undue risk of windblow, allowing retention of the wider coupe. From a landscape perspective, the new section of road is located in the heart of this section of forest which is topographically well-screened from external viewpoints, with the curved shape avoiding the creation of a linear features in the landscape.

The main change from what we looked at and discussed on site is a move from 20 to 21 turbines, with three of these turbines now located outside Cumberhead Forest, however from a forestry perspective two of these three turbines are partly located within a young farm woodland on the neighbouring Cumberhead Farm (FGS: 17FGS20397). This has implication for compensatory planting which will need to be addressed as before, but also grant reclaim considerations too. As this application progresses I will ensure I keep you updated on how this will be addressed, with David suggesting one solution could be delivering replacement planting on Cumberhead Farm itself, which I will now actively explore.

With regards to the treatment of this young woodland in relation to the windfarm application and the calculation of woodland removal under the Control of Woodland Removal Policy, there is obviously no forest plan detailing felling or replanting plans, so woodland loss will be on a straight like-for-like basis – in this case approximately 4.6ha of Sitka spruce.

We are very conscious of the need to deliver sound compensatory planting and we are working on the compensatory planting plans and will revert with details as soon as possible.

In the interim, if you have any further questions, please come back to me at any time.

Best regards,

Tim

**Tim Barratt**  
Partner, Forestry  
[REDACTED]

---

**From:** Tim Barratt  
**Sent:** 02 July 2020 09:52  
**To:** [REDACTED]

**Subject:** RE: Cumberhead West Windfarm Consultation

Morning David,

Thank you for reverting so quickly.

Yes, I can confirm that the intention at this stage is to retain the replanting species design as per the current approved forest plan minus any infrastructure keyholes, subject to any minor amendments that may be required to ensure UKFS and UKWAS compliance, which I will keep Scottish Forestry apprised of as we move towards a finalised design post-scoping.

Thank you also for the offer to look at potential compensatory planting sites which I will gratefully accept – I will revert with details as soon as possible.

Best regards,

Tim

**Tim Barratt**  
Partner, Forestry  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 July 2020 09:41  
**To:** Tim Barratt [REDACTED]

**Subject:** FW: Cumberhead West Windfarm Consultation

Hi Tim,

Thanks for the email.

Indeed this is an accurate reflection of our site meeting.

As a general comment, it was encouraging to observe the continued restructuring of the forest, I notice a big difference since my initial visits to Cumberhead back in 2008. The quality of restocking is particularly good. This provides the opportunity for this latest windfarm proposal to be accommodated within the forest whilst remaining UKFS compliant.

Could you confirm that the restocking plan remains as is with the exception of the key hole areas being removed? It will be important to confirm that the species composition remains UKFS compliant despite the infrastructure loss.

We do have a keen interest in the compensatory planting aspect of this and ideally the sooner you can present firm proposals the better. You mention that you are looking at several sites nearby. We'd be happy to look at these to confirm suitability. Ensuring the productive potential is at least equivalent is something we'd look to confirm.

I don't think Sasha has received the scoping request yet, but we will keep an eye out for it in the coming week.

Thanks

**David J Galloway MICFor**  
*Operations Manager*

Scottish Forestry  
Central Scotland Conservancy  
Bothwell House | Caird Park | Hamilton | ML3 0QA  
Direct: [REDACTED]

Website: [forestry.gov.scot](http://forestry.gov.scot)  
Twitter: [@scotforestry](https://twitter.com/scotforestry)



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---

**From:** Tim Barratt [REDACTED]  
**Sent:** 01 July 2020 14:49  
**To:** Galloway D (David) [REDACTED]  
**Subject:** Cumberhead West Windfarm Consultation

Dear David,

Thank you for your time yesterday to meet on site at Cumberhead and look at the forestry implications associated with the Cumberhead West Windfarm proposals.

I attach the indicative turbine and infrastructure layout for this section of the forest overlaid on the felling phase plan from the approved Forest Plan, along with an annotated version of the same map highlighting some of the key points discussed yesterday. By way of a brief summary of our discussions:

- Over the past few years the forest has steadily worked through the approved felling phases and associated replanting programme. With felling of phase 1 coupes now nearly complete, the intention remains to move on sequentially through the phase 2 harvesting programme; the anticipated felling years for the remaining coupes are detailed on the attached annotated map (WF indicates in-phase felling of mature crops for the windfarm).
- With the exception of the link road between T10 and T11, all other felling of mature crops can be undertaken within the approved Forest Plan. Any felling within young crops could be accommodated by “cookie cutter” insertion into the young crops without the risk in windblow.
- There are some potential separation/adjacency issues, most notably with the coupe associated with T1, where a full 2m height may not be achieved in replanted crops before the adjacent coupe is felled. In discussion the consensus was that this potential issues was not sufficient to merit changing the turbine location, as this is an area of low landscape sensitivity, in a section of forest which is extensively restructured, with good establishment rates in the neighbouring replanted coupes.
- Another option discussed was delaying the replanting of coupes felled for the windfarm, to allow the neighbouring crop to reach 2m height before replanting. This approach has issues associated with additional establishment costs and loss of production, and as such, on balance, it was felt delayed replanting was not appropriate.
- T10 to T11 link road – This is the only element of the proposal that requires material deviation from the approved forest plan and if an alternate access was possible to T10, this would be ideal, but if this was not possible from an engineering/gradient perspective then this could likely be accommodated – we briefly looked at this section of forest and depending on crop heights, one option might be to cookie cut the road line in to this crop – TB to investigate top heights further as necessary.
- We also discussed the option of retaining sections of the nearby phase 2 coupes, to balance out the felling phases if the phase 3 area of crop between T10 and T11 did need to be felled to accommodate the turbines

and access. Again in discussion we concluded that these sections of forest were unlikely to remain wind-firm through another phase before harvesting and it was not good practice to retain a section of woodland only to watch them blow over.

- Compensatory Planting – the Developer is familiar with the requirements for CP and is exploring how and where this might best be delivered on ground already under their control in the local area, however moving this process on over the next few months will be a priority and TB is to keep Scottish Forestry updated on progress.

I hope this is an accurate reflection of our discussion, however if should be grateful if you would add, edit or amend as necessary.

If you have not already received it, you and Sasha should shortly be receiving formal scoping documentation in relation to this proposal and if any questions arise from this please do not hesitate to get in contact.

Thank you again for your time and we will keep you updated as the Development progresses.

Best regards,

Tim.



---

**Tim Barratt**  
Partner, Forestry

Broxden House, Lamberkine Drive, Perth, Scotland. PH1 1RA  
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**Jessica Yanetta**

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*Operations Manager*

Scottish Forestry  
Central Scotland Conservancy  
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**Sent:** 01 July 2020 14:49

**To:** [REDACTED]

**Subject:** Cumberhead West Windfarm Consultation

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I hope this is an accurate reflection of our discussion, however if should be grateful if you would add, edit or amend as necessary.

If you have not already received it, you and Sasha should shortly be receiving formal scoping documentation in relation to this proposal and if any questions arise from this please do not hesitate to get in contact.

Thank you again for your time and we will keep you updated as the Development progresses.

Best regards,

Tim.



---

**Tim Barratt**  
Partner, Forestry

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## Jessica Yanetta

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**From:** Tim Barratt <[REDACTED]>  
**Sent:** 30 January 2020 15:51  
**To:** [REDACTED]  
**Cc:** 'Theo Philip'; Lindsay Smith  
**Subject:** Cumberhead West Windfarm Proposals [Filed 30 Jan 2020 15:51]  
**Attachments:** CW\_Baseline\_Felling\_Phase\_300120.pdf; CW\_Compensatory Planting Area\_200122-compressed.pdf

Dear Both,

Further to conversations with both of you over the past six to nine months and again recently (Sasha apologies for keeping missing one another today), I have been formally asked by Theo Philip of 3R Energy (cc'd) to contact you with regards to establishing early dialogue and a common understanding of requirements with regards to the development of a windfarm application in the western section of Cumberhead Forest – Cumberhead West Windfarm.

The Developer, and ultimate client is 3R Energy, with ITP Energised co-ordinating the integrated EIA Team. As with previous applications in Cumberhead Forest, the approach will be to focus on minimising the impact of any development on the existing woodland resource in line with the Control of Woodland Removal Policy. This will be achieved through keyholing large turbines (c. 200m tip height), allowing tree crop heights tall enough to accommodate a full rotation below the turbines. The limiting factor in minimising woodland removal will be the bat protection buffer zone, which it is anticipated will closely align with the Douglas West Extension application at 75m radius, giving a worse-case tree free footprint of 1.77ha per turbine.

It is anticipated that the impact on the Forest Plan within this section of the forest will be relatively limited;

- Turbines will be keyholed into the forest which is dominated by either young crops capable of keyholing with no requirement for management felling to windfarm boundaries, or crops due to be felled around the target construction date which will be midway through Phase 2 of the approved Forest Plan;
- A good network of forest roads exist to provide the backbone for the access infrastructure;

Some new sections of road and widening on corners will likely be necessary, along with temporary set-down areas, construction compounds and potential borrow pits too, all of which will need to be appropriately considered and allowed for in relation to the Control of Woodland Removal Policy.

Attached are two maps showing the indicative turbine infrastructure layout overlaid on the both the approved Forest Plan felling phase map and an aerial backcloth.

Again, as with previous applications, Windfarm Felling and Replanting Plans will be drafted, discussed and agreed with yourselves ahead of submission, clearly highlighting the net area of woodland removal to be addressed as part of the application. It is anticipated that the compensatory planting will be delivered on ground owned by the Mitchell family in the local vicinity, which will hopefully be informed by the CSGN funded woodland creation scoping exercise recently undertaken across their wider farm ownership – we will work with you on this as well to develop a suitable compensatory planting plan.

Please let me know if there is any other information you require at this point – we are looking at vantage points presently and I thought we could usefully include these locations as part of a site visit, to which end I should be grateful if you would liaise and come back to me with some potential meeting dates to look at the draft proposals on the ground – I appreciate due to current workloads this may not be possible for you until March but I am keen to get this on your radar in good time.

I will look forward to speaking to both of you in due course.

Best regards,

Tim.



---

**Tim Barratt**  
Partner, Forestry

Broxden House, Lamberkine Drive, Perth, Scotland. PH1 1RA  
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