



# Technical Appendix 2.2

## Gatecheck Report

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Gatecheck Report as issued to the Energy Consents Unit in September 2020





# Harestanes South Windfarm Extension

Gatecheck Report

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# 1 Introduction

## 1.1 Background

1. ScottishPower Renewables (UK) Ltd, trading as ScottishPower Renewables (hereinafter referred to as 'the Applicant') is applying to the Scottish Government's Energy Consents Unit (ECU) for consent and deemed planning permission to construct and operate an extension to the operational Harestanes Windfarm (hereinafter referred to as the 'Proposed Development'). The Proposed Development is located within Dumfries and Galloway approximately 13 kilometres (km) north of Dumfries (as shown on **Figure 1.1**).
2. The Applicant submitted an Environmental Impact Assessment (EIA) Scoping Report for the Proposed Development in April 2020 to the ECU, to accompany a request to Scottish Ministers to adopt a Scoping Opinion under Regulation 15 of the *Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017* (hereinafter referred to as the 'EIA Regulations'). The Applicant received an initial Scoping Opinion in June 2020 and a revised Scoping Opinion in August 2020 based on the receipt of comments that were submitted to the Scottish Ministers after the initial Scoping Opinion.
3. This Section 36 Gatecheck Report provides the ECU with an update on the status of the Proposed Development and progress with the EIA Report. The design iteration process undertaken by the Applicant to date is summarised in Section 3 and how the Applicant intends to respond to the points raised within the EIA Scoping Opinion is summarised within Section 4.

# 2 Consultees

4. Table 2.1 lists the consultees which provided a Scoping Response.

Consultee	
British Horse Society Scotland	Marine Scotland
BT	NatureScot (then Scottish Natural Heritage)
Crown Estate Scotland	NATS Safeguarding
Defence Infrastructure Organisation / Ministry of Defence	RSPB Scotland
Dumfries and Galloway Council	Scottish Environment Protection Agency (SEPA)
Galloway Fisheries Trust (also responding on behalf of Annan District Salmon Fisheries Board)	Scottish Rights of Way and Access Society
Glasgow Prestwick Airport	Scottish Water
Historic Environment Scotland	The Coal Authority
Joint Radio Company	Transport Scotland
Kirkmichael Community Council	

Table 2.1: Scoping Responses Received

5. Table 2.2 lists the consultees who did not provide a Scoping Response.

Consultee	
Ae Community Council	Tinwald Parish Community Council
Auldirth and District Community Council	Met Office
Civil Aviation Authority - Airspace	Mountaineering Scotland

Consultee	
Closeburn Community Council	Nith District Salmon Fisheries Board
Fisheries Management Scotland	Scottish Forestry
Galloway and Southern Ayrshire Biosphere	Scottish Wild Land Group
Glasgow Airport	Scottish Wildlife Trust
John Muir Trust	South Lanarkshire Council
Johnstone Community Council	Visit Scotland
Kirkmahoe Community Council	West of Scotland Archaeology Service

Table 2.2: No Scoping Responses Received

# 3 Design Iterations

## 3.1 Scoping Design

6. The EIA Scoping Report submitted in April 2020 used an indicative turbine layout for the purposes of compiling an indicative Zone of Theoretical Visibility (ZTV) of the Proposed Development and identifying proposed landscape and visual viewpoint locations. This layout comprised up to 15 turbines with a maximum blade tip height of up to 200 metres (m).

## 3.2 EIA Scoping Opinion comments on Design

7. Table 3.1 provides a summary of comments received from the ECU and other consultees on the design of the Proposed Development presented within the EIA Scoping Report.

Consultee	Scoping Comment	Scoping Opinion Ref.	Response
ECU	It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this. Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze	Section 5.4 & 5.5	A meeting was held on 7 May 2020 with the ECU, Dumfries and Galloway Council, NatureScot and SEPA during the EIA Scoping consultation period to discuss the proposals. A follow-up on-site meeting was offered to the ECU and statutory consultees which took place before design freeze, and was attended by Dumfries and Galloway Council Planning Case Officer and NatureScot Officer.
SEPA	The layout should be designed to minimise the extent of new works on previously undisturbed ground	Page A38	The design has sought where possible to use existing infrastructure such as the existing forestry tracks and construction compound, site access, borrow pits and substation from the operational Harestanes Windfarm.

Table 3.1: EIA Scoping Opinion – Design

### 3.3 Design Iterations

8. Following the submission of the EIA Scoping Report and the receipt of the EIA Scoping Opinion, the Applicant has undertaken a design process to optimise the Proposed Development while minimising environmental impacts.
9. Design iterations have taken into consideration the operational Harestanes Windfarm and existing on-site environmental and engineering constraints such as watercourses, telecommunication fixed links, slope gradients, areas of deep peat, cultural heritage assets and protected species.
10. Environmental baseline information has been gathered for the site by the Applicant and project team to identify a design layout that considers the environmental constraints identified and the consultee responses received to date. **Chapter 3: Site Selection and Design** of the EIA Report will outline the design iterations which have occurred prior to the finalised design of the Proposed Development. The key layout iterations are summarised in **Table 3.2** and illustrated in **Figure 3.1: Design Iteration of Turbine Layouts A, B and F**.

Layout	Description	Design Rationale
A	Scoping Layout (15 Turbines)	<p>A Developable Area (the envelope which constrained the location of main windfarm infrastructure) was initially defined, which took into consideration a number of factors including a 1km off-set from residential properties and an off-set of approximately 2km from the A701 due to visual considerations.</p> <p>Constraints taken into consideration at this stage included watercourse buffers, telecommunication fixed links, Core Path and 7stanes bike trail buffers and initial visual consideration to exclude the most obvious 'outer slopes' of the site to the south east.</p> <p>This layout was used for the EIA Scoping consultation stage.</p>
B	Refined Turbine Layout following first design workshop (9 Turbines)	<p>Following early consultation, turbines at the western end of the site were removed to avoid the 7Stanes mountain bike trail centre, remove visual impacts from Ae and potential noise impacts to Craigshields recreation centre. This also removed turbines which were encroaching on the outer slopes (or exterior) of the site and with proximity to local residents.</p> <p>The remaining turbines were re-positioned to optimise the site for peat constraints and landscape and visual factors such as gaps, stacking, outliers, scale comparison against operational Harestanes turbines and visibility against Queensbury.</p>
F	Final Layout (8 Turbines)	<p>Following further consultation, turbine 9 was removed due to a combination of environmental and technical factors. There were visual effects due to its position on the 'outer' slopes of the Site and also in relation to extensive cut and fill requirements for this location due to the slope gradient. This region of this site also has high bat activity and therefore it was decided that this turbine be removed.</p> <p>Turbine 15 was moved to the east to provide an off-set to a grave site and maintain its forest clearing setting; and to avoid a potential bat roost site.</p> <p>Turbine 12 was microsited to improve its position in relation to peat and mire habitat.</p>

Table 3.2: Turbine Layout Evolution

## 4 EIA Scoping Responses

11. Table 4.1 provides a summary of the EIA Scoping Responses received and the actions taken by the Applicant in response.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
Energy Consents Unit (ECU)	Scottish Ministers expect the EIA Report, which will accompany the application for the proposed development to consider in full all consultation responses attached in Annex A.	Section 3.4	Chapters 1 – 13	Response noted. All individual consultation responses attached in Annex A are listed below in the 'Scoping Comment' column along with their location within the ECU Scoping Opinion and how they have been addressed within the EIA.
ECU	Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the scoping report.	Section 3.5	N / A	Response noted.
ECU	In addition to the consultation responses, Ministers wish to provide comments concerning the scope of the EIA Report. The Company should note and address each matter.	Section 3.6	Chapters 1 – 13	Response noted. Each matter will be addressed within the EIA Report and an adjustment made to the scope or justification as to why no change is required.
ECU	For each generating station details of the proposal require to include but not limited to: <ul style="list-style-type: none"> <li>the scale of the development (dimensions of the wind turbines, solar panels, battery storage);</li> <li>components required for each generating station; and</li> <li>minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage.</li> </ul>	Section 3.7	Chapter 4: Development Description	A detailed description of the Proposed Development, its scale, required components and its export capacity is included in the EIA Report. Solar panels and battery storage is not applicable to the Proposed Development, and information on these types of infrastructure is not included in the EIA Report.
ECU	Scottish Ministers request that the Company contacts Scottish Water and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA Report of any relevant mitigation measures to be provided.	Section 3.8	Chapter 6: Hydrology, Hydrogeology, Geology and Soils	Information on public water supplies was requested from Scottish Water. Response from Scottish Water as part of the Scoping Opinion confirmed the Site is not located within a Drinking Water Protected Area (Surface Water).
ECU	Scottish Ministers request that the Company investigate the presence of any private water supplies that may be impacted by the development. The EIA Report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation that would be provided.	Section 3.9	Chapter 6: Hydrology, Hydrogeology, Geology and Soils	Consultation with Dumfries and Galloway Council was undertaken to identify private water supplies (PWS) and Dumfries and Galloway Council supplied PWS information within a 10km area surrounding the Site centre point. This consultation was followed by field surveys in July 2020 to confirm the PWS data supplied. An assessment of the potential impacts and risks on the PWS identified has been undertaken and is presented within Appendix 6.4 including any mitigation required.
ECU	In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	Section 3.10	Chapter 7: Ecology and Biodiversity	The ecology chapter considers SACs with qualifying features for fish where present and acid sensitive areas.
ECU	Marine Science Scotland also provide standing advice for onshore wind farms (which has been appended at Annex A) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA Report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA Report contains the required information; the absence of such information may necessitate requesting additional information that may delay the process.	Section 3.10	Chapter 7: Ecology and Biodiversity	The ecology chapter recognises this guidance and will provide the information as appropriate, this includes species and density of fish present and discuss and assess the potential impacts and appropriate mitigation associated with felling operations.
ECU	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition) should be followed in the preparation of the EIA Report, which should contain such an assessment and details of mitigation measures.	Section 3.11	Chapter 6: Hydrology, Hydrogeology, Geology and Soils	Due to the presence of areas of peat on the site, a peat landslide hazard and risk assessment is being undertaken and a soil and peat management plan prepared.  The peat landslide hazard and risk assessment applies a combined qualitative (contributory factor) and quantitative (factor of safety) approach to determine the likelihood of peat landslides and then compares areas with the highest likelihoods with receptors to identify

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
				risks and determine appropriate mitigation measures. Further details on the methodology, interpretation and results are provided within Appendix 6.1.  The Best Practice Guide for Proposed Electricity Generation Developments is being used for this assessment and it is being referenced within Chapter 6 where specific guidance has been taken from this guide.
ECU	It is recommended by the Scottish Ministers that the final list of viewpoints and visualisations be agreed following discussion between the Company, Dumfries and Galloway Council, Historic Environment Scotland and Scottish Natural Heritage.  Notes that when the Scoping Opinion was issued there is still an outstanding response from the Council's Landscape Architect, Archaeologist and Flood Risk Management Team which will be forwarded on to the Applicant once it has been received by the planning service, and this should be considered in the discussions.	Section 3.12	Chapter 5: Landscape and Visual  Chapter 10: Archaeology and Cultural Heritage	An updated viewpoint list was issued to stakeholders on the 22 July 2020 taking into account the Scoping Opinion and design development. Dialogue on landscape methodology has been commenced however responses from Dumfries and Galloway Council, and NatureScot have not been received to date. Historic Environment Scotland provided information in their scoping opinion responses as detailed below which is being taken into account in the chapter.
ECU	Aviation Lighting may be required due to the proposed scale and location of turbines. Further advice on aviation lighting is available from Scottish Natural Heritage.	Section 3.13	Chapter 5: Landscape and Visual	Aviation Lighting would be required for the turbines due to their height and location. Scottish Natural Heritage advice on assessment of aviation lighting is being used in the Landscape and Visual Lighting Assessment, which is provided as Appendix 5.5.
ECU	The noise assessment should be carried out in line with relevant legislation and standards as detailed in Chapter 10 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the Institute of Acoustics "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise".	Section 3.14	Chapter 9: Noise	The noise assessment is being undertaken in accordance with national and local planning policy and following current best practice guidance including the Institute of Acoustics: A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (IoA GPG), which is informing the assessment of operational noise that would be generated by the Proposed Development. The referenced 'Table 6.1' of the IoA GPG (actually Table 1 in section 6) is presented within Chapter 9: Noise and details the key points which good practice suggests should be included in windfarm noise assessments; these points will be fully reported within the completed assessment.
ECU	Scottish Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, and finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Section 3.15	Chapter 3: Site Selection and Design	Further engagement with statutory and non-statutory consultees will continue at the detailed design stage and during construction. Response noted that Scottish Ministers would like to be kept informed of any relevant discussions.
ECU	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter.  Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Section 4.1	Chapters 5 – 14	Response noted. Proposed mitigation measures will be detailed within each assessment chapter summarised in a Schedule of Mitigation table associated with Chapter 14: Summary of Residual Effects.
ECU	When finalising the EIA Report, applicants are asked to provide a summary in tabular form of where within the EIA Report each of the specific matters raised in this scoping opinion has been addressed.	Section 5.7	Chapter 2: EIA Process and Methodology	Response noted. This Gatecheck Report will be form an appendix to the EIA Report and will serve this purpose.
ECU	It should be noted that to facilitate uploading to the Energy Consents portal, the EIA Report and its associated documentation should be divided into appropriately named separate files of sizes	Section 5.8	N / A	The EIA Report and its associated documentation will be uploaded to the Energy Consents portal as separate files of no more than 10MB file



Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	no more than 10 megabytes (MB). In addition, a separate disc containing the EIA Report and its associated documentation in electronic format will be required.			size. A CD/DVD will also be provided of the EIA Report and its associated documentation at the submission stage.
<b>Statutory Consultee</b>				
Dumfries and Galloway Council – Access Officer	<p>I can confirm that the proposed area of the windfarm is affected by a Core Path recorded in the Dumfries and Galloway Core Paths Plan. Core Path no 39 runs through the proposed site as shown on the attached plan. This route is also recorded as the Romans and Reivers Trail, which is promoted as one of Scotland's Great Trails.</p> <p>The preliminary turbine layout would seem to have little impact on the route, however the developer should ensure access remains possible along the Core Path at all times during the construction phase of the development.</p>	A 1 Section 3.1 / 3.2	<p>Chapter 4: Development Description</p> <p>Chapter 12: Socio-economics, Tourism and Recreation</p>	<p>Part of this route would be upgraded and used for access during the construction of the Proposed Development. In addition, the export cable from the Site to the substation would be laid in a trench adjacent to part of this path.</p> <p>An Access Management Plan (AMP) would be prepared as part of the Construction Environmental Management Plan (CEMP) in order to ensure access is maintained throughout the construction period for users of this path. However, occasional temporary local diversions may be required to be implemented to facilitate the construction.</p>
Dumfries and Galloway Council – Archaeologist	<p>No official response provided to the scoping report but scope notes were provided along with the Historic Environment Record (HER) data. The following asset types are to be included within the baseline for assessment:</p> <ul style="list-style-type: none"> <li>Regionally significant heritage assets within 5km where the landscape setting is considered a key characteristic;</li> <li>Category B and C Listed Buildings within 5km</li> <li>Areas of Archaeological Interest within 10km;</li> <li>Undesignated assets deemed to be of national significance within 10km; and</li> <li>Non-Inventory Gardens and Designed Landscapes within 10km.</li> </ul>	Additional Consultation	Chapter 10: Archaeology and Cultural Heritage	Requirements noted from the Historic Environment Record (HER) data extract have been incorporated into the baseline, and a targeted site walkover was undertaken.
Dumfries and Galloway Council – Environmental Health Officer	<p>We have no objections in principal. However, until a site specific noise impact assessment has been carried out following the principles detailed in the Assessment &amp; Rating of Noise from Wind Farms ETSU Report ETSU-R-97, 1996 we would be unable to comment fully as to the expected impacts.</p> <p>We additionally suggest that a method statement for the construction project should be provided within the EIA for approval by Dumfries &amp; Galloway Council. This should include an assessment of potentially noisy operations and outline the noise mitigation measures proposed. This will also include a programme and phases for each stage of work.</p>	A 1 / A 2 Section 4.1 / 4.2	Chapter 9: Noise	<p>The noise assessment is being undertaken in accordance with national and local planning policy and following current best practice guidance including the Institute of Acoustics: A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise (IoA GPG), which will inform the assessment of operational noise that would be generated by the Proposed Development.</p> <p>The Scoping Report confirms that significant noise and vibration impacts are not expected to arise during the construction phase, and as such, assessment of construction noise and vibration have been scoped-out of the assessment. The EIA Report will be accompanied by an outline CEMP and a detailed CEMP will be prepared by the Principal Contractor at the detailed design stage, which will set out the method statement for construction and associated noise management measures. This will be subject to approval by Dumfries &amp; Galloway Council prior to construction.</p>
Dumfries and Galloway Council – Council Roads Officer	From the supplied plans and supporting information it appears that access and egress to this site is to be via the existing upgraded forest access at Burrance Bridge on the A701 Trunk Road, the agreed access for the existing Harestanes Wind Farm site. There should be no access to the wind farm construction site by any other routes.	A 2 Section 5.2	Chapter 11: Access, Traffic and Transport	No access is proposed from alternative routes.
Dumfries and Galloway Council – Council Roads Officer	Since access is to be via the Trunk Road network it would be appropriate that Transport Scotland be consulted regarding access considerations.	A 2 Section 5.2	Chapter 11: Access, Traffic and Transport	Transport Scotland was consulted as part of the EIA Scoping consultation.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
Dumfries and Galloway Council – Council Roads Officer	A secondary AIL access route utilising the port of Cairnryan has also been identified in the report. The access routes identified include the A77(T), A751(T), A75(T) and A714. It would appear this may have been erroneously copied from another document for a different windfarm. The Scoping Report should be updated to only reflect applicable access routes.	A 2 Section 5.3	Chapter 11: Access, Traffic and Transport	EIA Report chapter will only include correct information regarding access. It is proposed that the turbine components are delivered to the King George V Dock in Glasgow. The port of Cairnryan may be considered a secondary option however it has some restrictions including limited water depth and port handling facilities/component storage.
Dumfries and Galloway Council – Council Roads Officer	I am aware of historic unauthorised use of minor roads in the Beattock area during the original wind farm construction period. In order to regulate traffic movements during the whole construction period a traffic management plan (TMP) should be submitted and agreed in writing with the Council, Transport Scotland and the Police, prior to any works commencing.	A 2 Section 5.4	Chapter 11: Access, Traffic and Transport	A framework TMP will be included at this time and it would be proposed to undertake a full TMP prior to any works commencing on site subject to the necessary approvals.
Dumfries and Galloway Council – Council Roads Officer	There are a number of 'Core' paths including a National Cycle Route that run through or adjacent to this site. This area is widely used by walkers and by mountain bikers as one of the popular '7 Stanes' centres and there is a Café, Bike Shop and car parks at the Ae Forestry and Land Scotland offices. It would be appropriate that accommodations and mitigations be made to ensure the safety of walkers and cyclists during construction works, and such accommodations and mitigations should meet with the approval of the Councils' Access Team and the Sustainable Travel Team.	A 2 Section 5.5	Chapter 12: Socio-economics, Tourism and Recreation	A CEMP and AMP would be drafted by the Principal Contractor in order to ensure maintained access and safety for users of Core Path 39 (Ae Forest Large Circular), Roman and Reivers Long Distance Route, Regional Cycle Route 10 and Locharbriggs-Beattock local cycle route. The AMP would be submitted for approval by the Dumfries and Galloway Council Access Team and Sustainable Travel Team prior to the commencement of construction works. The CEMP will be based on the Outline CEMP presented in Appendix 4.1. Section 12.6 and 12.7 of Chapter 12 provides further detail on the potential effects on these receptors and proposed mitigation measures.
Dumfries and Galloway Council – Council Roads Officer	Creation of windfarm access tracks and turbine placements will likely generate accelerated timber extraction. The road network in Dumfries and Galloway has been assessed relative to use by forestry extraction vehicles by Dumfries and Galloway Council in partnership with the Forestry Industry and this is reflected in the Agreed Routes Map. All extracted timber must only travel via suitable routes identified on the Agreed Routes Map and after consultation with the Council.  It would be appropriate that there should be consultation with nearby forest managers and timber hauliers through the office of the South of Scotland Timber Transport Officer to co-ordinate timber haulage operations that may use the access route(s) during the construction period to minimise the cumulative impact on communities and road users.	A 2 / A 3 Section 5.6 / 5.7	Chapter 11: Access, Traffic and Transport and Chapter 13: Other Issues	No further action is required at this time. The Applicant agrees to undertake the timber extraction following the agreed methodology with the Local Authority and any other relevant stakeholders.
Dumfries and Galloway Council – Council Roads Officer	In the event that suitable and sufficient aggregate is not available from on-site Borrow Pits, any future submission/EIA Report/TMP should also identify worst case scenario that 100% of the aggregate required for construction shall be imported to site and identify the potential number of movements in that event so that the potential impact of importing aggregate from elsewhere via the public road network be assessed.	A 3 Section 5.8	Chapter 11: Access, Traffic and Transport	A worst case assessment has been undertaken.
Dumfries and Galloway Council – Council Roads Officer	The TMP should include a programme of delivery types/numbers by month, details of all proposed mitigation measures to minimise the impact on local communities and businesses, agreed and excluded access routes and details of measures that will be implemented to ensure that: <ul style="list-style-type: none"> <li>no stacking of delivery vehicles occurs on any part of the public road network;</li> <li>the safety of the public using 'core' and cycle paths is maintained; and</li> <li>access and excluded routes should be identified and agreed for all types of vehicles and a system of visible vehicle tagging/badging employed to ensure compliance with agreed routes and driver behaviour standards which should be supported by a Driver Code of Conduct and is to be agreed in writing with the Police and the Roads Authority prior to any works commencing on site.</li> </ul>	A 3 Section 5.9	Chapter 11: Access, Traffic and Transport	A framework TMP has been included at this time and it would be proposed to undertake a full TMP prior to any works commencing on site.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
Dumfries and Galloway Council – Council Roads Officer	There is the possibility of other unrelated windfarm projects being constructed in the vicinity concurrently with this project. Therefore, it would be appropriate that the TMP acknowledge that co-ordination phasing may be required to mitigate against the cumulative traffic impact. Prior to the submission of the TMP, all potential access routes should be assessed and where possible, collaborative work should be taken with other wind farms utilising similar routes.	A 3 Section 5.10	Chapter 11: Access, Traffic and Transport	A framework TMP has been included at this time and it would be proposed to undertake a full TMP prior to any works commencing on site which would take into account co-ordination phasing with other developments if applicable.
Dumfries and Galloway Council – Planning	There is still an outstanding response from the Council's <ul style="list-style-type: none"> <li>Landscape Architect;</li> <li>Archaeologist; and</li> <li>Flood Risk Management Team</li> </ul> <p>These will be forwarded on to the Applicant once it has been received by the Planning Service.</p>	A 3 Section 6.1	N / A	Response noted. Subsequent requests for response have been sent.
Dumfries and Galloway Council – Planning	The Council considers that the structure of the scoping report is clear and sets out a prudent approach to the topics that may give rise to significant effects and should be fully examined in the forthcoming EIA Report. Additionally, the topics listed in the report are acceptable to the Council and should be fully assessed within the EIA Report.	A 6 Section 8.1	Chapters 5 – 13	Response noted.
Dumfries and Galloway Council – Landscape and Visual Impacts	Landscape and visual impact forms one of the development management considerations within LDP2 Policy IN2. In particular: <ul style="list-style-type: none"> <li>the extent to which the proposal addresses the guidance contained within the Dumfries &amp; Galloway Windfarm Landscape Capacity Study (DGWLCS);</li> <li>the extent to which the landscape is capable of accommodating the development without significant detrimental impact on landscape character or visual amenity; and</li> <li>that the design and scale of the proposal is appropriate to the scale and character of its setting, respecting the main features of the site and the wider environment and that it fully addresses the potential for mitigation.</li> </ul> <p>IN2 also sets out that for all wind farm proposals, the extent of any detrimental landscape or visual impact from two or more wind energy developments (i.e. cumulative impact), and the potential for mitigation, also requires to be assessed. The Supplementary Guidance (SG) Wind Energy Development: Development Management Considerations corresponds with, and gives more detail on how cumulative impacts on landscape and visual amenity are assessed at Part B. In addition, the DGWLCS (as Appendix C to the SG) assesses the individual landscape area to accommodate wind energy development. It includes an appraisal of the cumulative landscape and visual effects of existing and consented wind energy developments and an assessment of where ultimate landscape capacity is close to be being reached.</p>	A 3 – A 4 Section 7.2 – 7.3	Chapter 5: Landscape and Visual	The landscape and visual impact assessment (LVIA) has made reference to LDP2 Policy IN2 and the DGWLCS. The landscape character assessment has been informed by the DGWLCS landscape types.
Dumfries and Galloway Council – Landscape and Visual Impacts	Key cumulative effects that could occur if additional development were located in the Ae Foothills include: <ul style="list-style-type: none"> <li>An extension of the dominant 'corridor' effect of large wind turbines experienced from major transport routes and settlement within the Evan valley - this could also extend south into Annandale if development were also located in the northern parts of this landscape and the Annandale Foothills (18).</li> <li>An increase in the extent and accentuation of the prominence of the Dalswinton wind farm seen from the well-settled Nithsdale area if further large turbines were located on the western and southern edges of this landscape.</li> <li>Views from hill summits such as the Moffat Hills, where further development within the northern part of the Ae Foothills would consolidate wind farm development, appearing as a</li> </ul>	A 5 Section 7.9	Chapter 5: Landscape and Visual	The turbines have been carefully positioned set back from the perimeter Ae foothills. The spread of turbines/footprint has been kept to a minimum to appear as a natural extension to the operational Harestanes Windfarm, and reduce the potential for appearing to join with other cumulative windfarm sites. The positioning of the turbines has attempted to reduce direct comparison with the operational turbines as far as possible, taking into account the varying topography across the Site. <p>The stacking of turbines in views from transport routes has been avoided where possible.</p>

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<p>concentrated and, potentially conjoined, band of turbines extending along much of Annandale and the upper Clyde valley.</p> <ul style="list-style-type: none"> <li>The introduction of substantially larger turbines as part of new wind farm developments or extensions which could incur cumulative effects with operational wind turbines which are around 125m high. These effects would comprise obvious differences in turbines size and blade rotation.</li> </ul>			<p>Evan valley and northern part of the Ae Foothills – the positioning of the Proposed turbines to the south west of the operational scheme avoids the northern part of the Foothills and Evan Valley.</p>
<p>Dumfries and Galloway Council – Landscape and Visual Impacts</p>	<p>The key constraints to wind farm development within this LCT generally are:</p> <ul style="list-style-type: none"> <li>Recreational use of the Forest of Ae by walkers and cyclists, including the SUW, the 7Stanes and associated routes.</li> <li>The incised Water of Ae valley with its more diverse policy woodlands and focus of visitor facilities in the southern part of this landscape unit.</li> <li>The pronounced conical summit of Queensberry Hill on the eastern edge of the Lowthers which forms a landmark, and the distinct rugged edge of the Lowther Hills extending north of this hill (including Harestanes Heights) which are visible across Annandale.</li> <li>The ‘pinch point’ of these foothills at the Evan valley where settlement and major transport routes lie in closer proximity to these foothills.</li> <li>The Devil’s Beef Tub landmark feature which lies at the head of upper Annandale close to the northern boundary of this landscape unit.</li> <li>Operational and under-construction wind farm development within this landscape unit, in the Beattock Foothills (18) and in neighbouring South Lanarkshire.</li> <li>The perimeter hills on the southern and western boundaries of this unit which are prominent from Nithsdale, Annandale and from the Torthorwald Ridge and which also provide a degree of containment to the operational Harestanes wind farm in some views.</li> <li>Extensive archaeological remains in non-planted areas.</li> </ul>	<p>A 5 Section 7.10</p>	<p>Chapter 5: Landscape and Visual</p>	<p>The turbines have been carefully positioned to avoid recreational routes and to minimise route closures during construction.</p> <p>The turbines have been carefully positioned to avoid the Water of Ae valley and visitor facilities.</p> <p>Queensberry: The LVIA will include a viewpoint from Queensberry and Queensberry has been used as a design viewpoint. The LVIA also considers the views towards it as well as from its summit. Turbine locations have been selected to reduce horizontal spread and retain them within the existing extent of turbines.</p> <p>Evan valley: Turbines have been carefully positioned set back from the perimeter foothills and keeping the spread of turbines/footprint to a minimum. The stacking of turbines in views from transport routes has been avoided where possible.</p> <p>Devil’s Beef Tub: Devil’s Beef Tub viewpoint is orientated to the north east, with no visibility of the Proposed Development. However, the LVIA includes a viewpoint to the south to represent available views towards the site from the surrounding area. The positioning of the turbines has attempted to reduce direct comparison and horizontal spread.</p> <p>Operational and under-construction windfarm development: Turbines have been carefully positioned set back from the perimeter foothills and keeping the spread of turbines/footprint to a minimum to help reduce cumulative impacts. The LVIA considers all relevant operational, consented, and application sites within a 30km Study Area.</p> <p>Perimeter hills: The turbines have been carefully positioned set back as far as possible from the perimeter foothills and keeping the spread of turbines/footprint to a minimum in addition to the operational Harestanes windfarm.</p>
<p>Dumfries and Galloway Council – Landscape and Visual Impacts</p>	<p>The DGWLCS lists the opportunities as:</p> <ul style="list-style-type: none"> <li>The large scale and gently undulating plateau-like landform of this landscape.</li> <li>The higher ground of the adjacent Lowther unit of the Southern Uplands (19) lying to the north and west which restricts views of this lower-lying plateau-like landscape unit from upper Nithsdale, where the Thornhill Uplands RSA and designed landscape of Drumlanrig greatly increase sensitivity.</li> <li>The predominantly simple land cover of commercially managed forestry and the sparsely settled nature of this unit.</li> </ul>	<p>A 6 Section 7.11</p>	<p>Chapter 5: Landscape and Visual</p>	<p>The design of the Proposed Development considers these opportunities:</p> <p>The large scale and gently undulating plateau landform reduces the apparent scale of the turbines, and also provides opportunities for the proposed turbines to appear at similar elevations to the operational turbines, reducing the scale contrast.</p> <p>The turbines’ position allows the Southern Uplands to provide screening to the north and north west so that much of the Thornhills</p>

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<ul style="list-style-type: none"> <li>The screening effects of intermediate woodland and localised rolling landform within Annandale which limits the extent of visibility of this landscape from settlement and roads.</li> </ul>			<p>RSA has no visibility of the turbines and visibility is contained to the edge of the Southern Uplands north of the Site.</p> <p>The forestry landcover would be retained and provides screening of the infrastructure associated with the Proposed Development.</p> <p>The sparsely settled nature of the Site has allowed the positioning of turbines to limit the potential for any residential visual amenity effects.</p> <p>The LVIA considers the effects on residents and road users within Annandale, noting that clear views towards the site are not a characteristic.</p>
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>The DGWLCS guidance for development within this landscape states that: “There are no opportunities for the Very Large typology (80-150m) to be accommodated in this area as additional turbine developments. This is because operational wind farm development already occupies the least sensitive interior plateau and very large turbines sited to the west and north-east would be likely to incur significant effects on more sensitive nearby landscapes and cumulative effects with operational wind farms. Repowering projects involving replacement of operational turbines with larger models could potentially be accommodated provided turbines were set well back from the more sensitive settled Annandale and Nithsdale areas and avoided overwhelming the landmark hill of Queensberry and the Lowthers in key views. In this respect, the Harestanes wind farm site offers greater scope than the Dalswinton wind farm site for potentially accommodating larger turbines.</p> <p>There may be some very limited scope to accommodate further turbines within the Large typology (turbines 80-150m). Some small extensions to operational wind farms may be possible although will be constrained by the need to avoid the more sensitive outer edges of this landscape unit and open moorland. Any additional development should also not encroach on the steep upper slopes of Queensberry Hill and the rugged upland edge that extends north of this hill (both lying within the adjacent Lowther unit of the Southern Uplands 19) as this would further diminish their focus in views from Annandale.</p>	A 6 Section 7.12	Chapter 5: Landscape and Visual	<p>The Proposed Development is a small extension to the operational array, with the turbines wrapped around the south western edge of the operational site, reducing the potential to affect the sensitive receptors to the north east and west. The turbines have been carefully positioned set back from the perimeter Ae foothills as far as possible, to avoid appearing on the exterior slopes at the edge of Annandale.</p> <p>The spread of turbines/footprint has been kept to a minimum to appear as a natural extension to the operational Harestanes Windfarm and reduces the potential for appearing to join with other cumulative windfarm sites. The positioning of the turbines has attempted to reduce direct comparison with the operational turbines as far as possible, taking into account the varying topography across the Site.</p>
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>Following a conference call with the Applicant, Council and Scottish Government’s consents unit, it was noted that there were several errors and omissions in the cumulative wind farms map supplied with the scoping report and these were identified (but not limited to) as the following:</p> <ul style="list-style-type: none"> <li>Windy Standard III listed as approved development; however, this is still awaiting the outcome of a PLI;</li> <li>Windy Rig wind farm listed at application stage; this is consented development;</li> <li>Longburn wind farm; listed at application stage however this has been refused at appeal;</li> <li>Loch Urr is listed at application stage however, it is unclear which scheme this refers to as the Section 36 application from EDF was withdrawn some time ago. An application in the vicinity (Fell wind farm – 20/0148/FUL) occupies part of the Loch Urr application site. Clarification should be provided here;</li> <li>Euchanhead wind farm is listed at application stage; the Council have scoped a scheme at this location but no application or S36 consultation has been received. There is a S36 consultation for “Sanquhar II” at this location and clarification should be provided in this respect;</li> <li>The Trostan Loch S36 scheme is missing;</li> <li>Glenshimmeroch wind farm (consented at appeal) is missing and is also the subject of a Section 42 application to increase the tip height;</li> </ul>	A 6 / A 7 Section 8.2	Chapter 5: Landscape and Visual	<p>The data presented at the Scoping stage was from an initial search. This has been updated for the submission with a cut-off date of the 18 August 2020.</p>

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<ul style="list-style-type: none"> <li>Cornharrow wind farm (in the vicinity of the above) is at application stage with the Council and is missing from the cumulative map;</li> <li>Little Hartfell wind farm is consented development located within the cluster of wind farms to the north east of Langholm and is missing from the cumulative map; and</li> <li>Loganhead wind farm is located in the vicinity of the above and is also consented development, currently subject of a Section 42 application to the Council to increase the tip height and is missing from the cumulative map.</li> </ul>			
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>Question 1: Are the proposed Study Areas acceptable for the LVIA and CLVIA?</p> <p>The Council agrees in principle, however further input from the Council's Landscape Architect is required.</p>	A 7 Section 8.3	Chapter 5: Landscape and Visual	Response noted. Last request/reminder for response was sent to Dumfries and Galloway Council on the 31 August 2020.
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>Question 2: Are there any comments on the overall methodology proposed to assess effects on landscape and visual receptors, including cumulative effects?</p> <p>As noted above, input from the Council CLA would be required.</p>	A 7 Section 8.3	Chapter 5: Landscape and Visual	Response noted. Last request/reminder for response was sent to Dumfries and Galloway Council on the 31 August 2020.
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>Question 3: Are the proposed viewpoint locations acceptable, including for lighting assessment?</p> <p>The Council agrees in principle, however as the CLA will be making an assessment based on these, further input would be required. An additional viewpoint as a landmark hill/wild land from Burnswark Hill should be included; this is just outwith the 15km study area included with the Scoping report and is located to the east of the application site, to the south of the town of Lockerbie.</p>	A 7 Section 8.3	Chapter 5: Landscape and Visual	<p>The additional viewpoint from Burnswark Hill has been included within the updated viewpoint list and as part of the assessment.</p> <p>Last request/reminder for response was sent to Dumfries and Galloway Council on the 31 August 2020.</p>
Dumfries and Galloway Council – Landscape and Visual Impacts	<p>Question 6: Do you agree with the landscape and visual receptors proposed to be scoped out?</p> <p>Further input from the CLA is required.</p>	A 7 Section 8.3	Chapter 5: Landscape and Visual	Last request/reminder for response was sent to Dumfries and Galloway Council on the 31 August 2020.
Dumfries and Galloway Council – Archaeology and Cultural Heritage	<p>Question 10: Do you agree with the Cultural Heritage proposed approach for baseline collection, prediction of effects and significance assessment?</p> <p>As the Council's archaeologist has yet to provide a response, the Council cannot agree to the approach outlined at present.</p>	A 7 Section 8.3	Chapter 10: Archaeology and Cultural Heritage	Last request/reminder for response was sent to Dumfries and Galloway Council on the 25 August 2020.
Dumfries and Galloway Council – Other Issues	<p>Question 15: Do you agree with the proposed approach for baseline collection, prediction and significance assessment for the following topics: Forestry and Land Use, Aviation and Radar, Eskdalemuir Seismic Array, Telecommunications, Air, Climate and Carbon Balance, Shadow Flicker, Population and Human Health, Major Accidents and Disasters and Material Assets?</p> <p>The Council agrees with the baseline approach to these matters; an up to date picture of the noise budget issues surrounding the Eskdalemuir Seismic Array should be provided within the submitted EIA Report.</p>	A 7 Section 8.3	Chapter 13: Other Issues	<p>Response noted.</p> <p>SPR continue to sit on the Scottish Governments Eskdalemuir working group which is working towards a resolution regarding seismic noise budget constraint.</p>
Historic Environment Scotland (HES)	<p>Wallace's House, fort 1100m NW of Burrance Bridge (SM604) is located within the development site boundary. While the fort would not experience direct impacts from the turbines, the proposals may give rise to indirect impacts on the setting of the following assets located within the vicinity of the site.</p> <ul style="list-style-type: none"> <li>The Knock, settlement 300m WSW of Burrancehill Cottages (SM3489)</li> <li>Maggiemauts Knowe, fort 150m NE of Courancehill (SM3488)</li> </ul>	A 20 – A 21	Chapter 10: Archaeology and Cultural Heritage	The heritage assets listed in the Scoping Comment column are being assessed as requested and all potential relationships between possible contemporary heritage assets discussed.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<ul style="list-style-type: none"> <li>• Davie's Kirk fort 40m W of (SM3299)</li> <li>• Tanner's Linn, earthwork (SM10533)</li> <li>• Ogle Linn, earthwork (SM10497)</li> <li>• Raehills (GDL00322)</li> <li>• Cowhill Tower (GDL00109)</li> <li>• Drumlanrig Castle (GDL00143)</li> <li>• Ellisland Farm (LB4232)</li> <li>• Drumlanrig Castle (LB3886)</li> <li>• Raehills House (LB9898)</li> </ul> <p>We recommend that any EIA Report should include a detailed assessment of impacts (direct and indirect) on the setting of the heritage assets in the vicinity of the site. We would also expect the EIA Report to address the impact of the development on these monuments individually and on the relationship between them.</p>			
HES	<p>We have reviewed the EIA Scoping Report (April 2020) submitted as part of this scoping request. We are content to agree the methodology and the proposed approach to field surveys. We are also content to agree on the inner and outer study area proposed.</p>	A 21	Chapter 10: Archaeology and Cultural Heritage	Response noted.
HES	<p>The description of the baseline data collection criteria is not entirely clear. Although we note that an area within 10km of the development has been identified as an area of search section 8.3 of the document adds two further search factors without defining them. Heritage assets "with a larger presence" will be considered outwith this 10km boundary, along with "designated sites which are within the ZTV". The criteria for a site to have "a larger presence" is not clear, nor is it obvious if the reference to the ZTV relates to the area within the 45km buffer shown in Figure 5.3 or another undefined zone. We recommend that the use of such terms is clarified in any EIA Report produced for this proposal.</p> <p>Notwithstanding these ambiguities, we are content that a 10km search zone around the development area should be sufficient to identify most sites that could experience an impact from the development, especially if combined with the potential to assess designated sites up to 45km distant and to consider undesignated sites that fall within the "larger presence" category.</p>	A 22	Chapter 10: Archaeology and Cultural Heritage	The study area has been more clearly defined so that all designated heritage assets within the remit of HES have been included within 10km of the turbine locations. The use of heritage assets "with a larger presence" is no longer defined as a search criteria and only those heritage assets recommended by HES that fall out with the 10km buffer have been considered.
HES	<p>Section 8.5 recommends that World Heritage Sites, Inventory Battlefields and Historic Marine Protection Areas should be scoped out of the EIA process as there are none within their study area. We are content with this for our own interests however, the Applicant should ensure to consult with Historic England on this matter, as part of the World Heritage Site for Hadrian's Wall lies within the ZTV area.</p>	A 22	Chapter 10: Archaeology and Cultural Heritage	Response noted. Consultation with HES is ongoing regarding engagement with Historic England.
HES	<p>Section 8.6 covers the potential effects of the works, subdividing them into construction and operational effects. We are content that the Report shows an understanding of the effects that could result in impacts to cultural heritage assets. However, we are concerned by an apparent discrepancy in the way these effects are considered in this section. In sections 8.2 and 8.3, a 10km buffer is considered necessary to identify assets that could be impacted by the development. But section 8.6.2 which addresses likely significant effects once the wind farm is operational, contradicts this:</p> <p>"It is considered only those assets within, or within relatively close proximity to the Proposed Development (circa 5km) may potentially receive a significant effect on their settings during construction and operation. The designated assets out with the 5km buffer can be scoped out of full assessment where the distances from the Proposed Development, or the presence of</p>	A 22 – A 23	Chapter 10: Archaeology and Cultural Heritage	The study area has been more clearly defined so that all designated heritage assets within the remit of HES have been included within 10km of the turbine locations and those heritage assets recommended by HES that fall out with the 10km buffer have also been considered.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<p>intervening topography, or other screening significantly reduces the likelihood of indirect impacts from the Proposed Development. This will be confirmed and reported in the EIA Report”.</p> <p>We consider this 5km limit adds a level of confusion to the assessment process. Any asset anywhere within the 10km buffer can be scoped out if intervening topography reduces the likelihood of visual, aural or other setting impacts to a negligible level.</p> <p>Likewise, an asset 15 km away may experience a significant impact on its setting if a key relationship or view is affected. The criteria outlined in section 8.3 should be applied to section 8.6.</p>			
HES	<p>We note that the methodology to assess the significance of effect will follow the guidelines outlined in the Environmental Impact Assessment Handbook and that CIFA standards and HES Managing Change guidance will be used to inform this process. We are content that this process should produce an adequate assessment.</p> <p>We welcome the proposals in Section 8.1 to consult on the requirement for visualisations as part of the EIA process. Our response should offer our help in assessing the need for illustrative material once the initial identification of relevant heritage assets has been undertaken.</p>	A 23	Chapter 10: Archaeology and Cultural Heritage	Response noted. The visualisations requested through scoping are considered adequate for the assessment; consultation with HES is ongoing.
HES	<p>There is a large number of scheduled monuments in the vicinity of the proposed development.</p> <p>Wallace's House, fort 1100m NW of Burrance Bridge (SM604) is located within the development site boundary. While the fort would not experience direct impacts from the turbines, the overall design should ensure this monument is also protected from direct impacts from other works such as quarry pits, access roads, anemometer masts, power lines and general storage and working areas. These features should also be considered when assessing setting impacts for all monuments potentially affected.</p> <p>The development may impact on the setting of the following sites and any EIA Report produced should include an assessment of such impacts including any effects on the relationship between these sites.</p> <ul style="list-style-type: none"> <li>• The Knock, settlement 300m WSW of Burrancehill Cottages (SM3489)</li> <li>• Maggiemauts Knowe, fort 150m NE of Courancehill (SM3488)</li> <li>• Davie's Kirk fort 40m W of (SM3299)</li> <li>• Tanner's Linn, earthwork (SM10533)</li> <li>• Ogle Linn, earthwork (SM10497)</li> </ul> <p>The possible relationships between monuments should also be considered as part of their setting assessments. There is a notable concentration of later prehistoric and medieval sites in an area arcing around the SE and E sides of the windfarm. It is likely that at least some of these sites would have been built with specific reference to each other and this could form an important part of their settings.</p>	A 23 – A 24	Chapter 10: Archaeology and Cultural Heritage	The heritage assets listed in the Scoping Comment column are being assessed as requested and all potential relationships between possible contemporary heritage assets discussed.
HES	<p>The proposed viewpoints are very much focussed on wider landscape and lighting impacts than for assessing impacts on individual historic buildings or GDLs. Where these impacts seem potentially significant or uncertain, provision of photomontages would be helpful. In some instances below we have suggested potential viewpoints, but are not able to do this for all potentially-affected assets on the basis of the current information: we will be happy to discuss this further with the Applicants, if that would be useful.</p>	A 24	Chapter 10: Archaeology and Cultural Heritage	Photomontages and wireframes are being included only for the named sites where these would have visibility of the Proposed Development according to the Zone of Theoretical Visibility (ZTV). Consultation with HES is ongoing.



Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
HES	<p>The Scoping report identifies the following Designed Landscapes that may be affected by the proposals.</p> <ul style="list-style-type: none"> <li>• Raehills (GDL00322)</li> <li>• Cowhill Tower (GDL00109)</li> <li>• Drumlanrig Castle (GDL00143)</li> </ul> <p>We agree that all these should be assessed. In addition, Maxwellton (Glencairn Castle) (GDL00276) should also be assessed. Of these it seems that Raehills is most likely to be significantly affected. A photomontage and wireframe looking towards Raehills House and the proposed development, taken from within the designed landscape or A701 should be produced.</p> <p>Because of the particular significance of Drumlanrig castle and garden, any potential impact needs to be carefully investigated. We suggest that a photomontage and wireframe from the east parterre, looking towards the proposed turbines would be helpful. It would be helpful if the location of the existing turbines could also be marked in this view.</p>	A 24 – A 25	Chapter 5: Landscape and Visual and Chapter 10: Archaeology and Cultural Heritage	<p>Photomontages and wireframes are being included only for the named sites where these would have had visibility of the Proposed Development according to the Zone of Theoretical Visibility (ZTV).</p> <p>There is no visibility within the Raehills GDL, but a viewpoint (VP4) is being provided in the LVIA from the A701 which overlooks the designation. A viewpoint (VP13) is also being provided from Drumlanrig Castle gardens. Viewpoint 18 on the A76 is in close proximity to Cowhill Tower.</p> <p>Consultation with HES is ongoing.</p>
HES	<p>It is important that the Applicant considers the impact on the setting of A-listed buildings in the vicinity, particularly where it seems likely that the turbines may be visible in important views to and from these buildings.</p> <p>In addition to Raehills House (LB9898) and Drumlanrig Castle (LB3886), there may be significant impacts on the settings of the group of A-listed buildings near Templand; and on Ellisland Farm (LB4232). There appear to be long views towards the development site from the approach drive to Ellisland, and the impact here could be significant. Ellisland was the home of Robert Burns and it is important that the setting of this group of buildings is not adversely affected. A photomontage / wireframe view taken from the drive, looking towards the farm and development site should be produced. We suggest that the view should be taken from a sensible point near the west end of the carpark. The line of deciduous trees to the east of the farm is unlikely, in our view, to provide any significant screening protection against a visual impact here.</p>	A 25	Chapter 10: Archaeology and Cultural Heritage	<p>Photomontages and wireframes are being included only for the named sites and locations where these would have had visibility of the Proposed Development according to the Zone of Theoretical Visibility (ZTV). Visualisations are included for Ellisland Farm. Consultation with HES is ongoing.</p>
NATS Safeguarding	<p>The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.</p> <p>Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.</p>	A 31	Chapter 13: Other Issues	<p>An aviation assessment is included within the EIAR which considers the response from NATS.</p> <p>Technical and Operational Assessment was received in July 2020. Please see response in rows below.</p>
NATS Safeguarding	<p><i>NATS response to a reduction from a 15 Turbine to a 9 Turbine Scheme and following their technical assessment.</i></p> <p>The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.</p> <p>Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report Technical and Operational Assessment SG09361 Issue 3.</p> <p>Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.</p>	Further Consultation Technical and Operational Assessment (TOPA) – Page 7	Chapter 13: Other Issues	<p>An aviation assessment is included within the EIAR which considers the response from NATS.</p>

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.			
NATS Safeguarding	No impact is anticipated on NATS' navigation aids and NATS' radio communications infrastructure.	Technical and Operational Assessment – Page 8	Chapter 13: Other Issues	Response noted.
NatureScot	We would like to receive a paper copy of the landscape and visual impact assessment figures of the EIA Report when consulted on the application. Should we still be working to Scottish Government COVID-19 policies, we would like to receive a copy once our offices are able to receive mail again.	A 43	Chapter 5: Landscape and Visual	Response noted.
NatureScot	<p>The Report appears comprehensive in its approach to EIA, although does not include mention of a Habitat Management Plan (HMP) for the site.</p> <p>It is now usual for an applicant to propose some form of HMP in their EIA Report, briefly setting out broad measures for positive management and enhancement of habitats within the development site to benefit biodiversity. This is then worked-up, once permission is granted, into a more detailed plan to be implemented throughout the lifetime of the windfarm.</p> <p>This site is in the ownership of Forestry and Land Scotland (FLS) who have a conservation remit and biodiversity duty, as well as timber production. We would expect the HMP to build upon, and be additional to, work for conservation/biodiversity identified in the current Ae Composite Land Management Plan (LMP) under the UK Woodland Assurance Scheme. For example, the Scoping Report and LMP highlights small areas of semi-natural ancient woodland on the site, frequently close to watercourses. The HMP could propose the expansion of some or all of these and/or create new areas as permanent native woodland cover. Management to benefit red squirrels and black grouse are also possibilities.</p> <p>Such habitat improvements could also be linked to, encourage, and benefit recreational users of the multiple trails that exist both within and close to the site; including FLS's own trails, Core Paths, a Sustrans Route, and the Romans and Reivers Route, one of Scotland's Great Trails which also runs through the proposed site.</p>	A 44 – A 45	Chapter 7: Ecology and Biodiversity	An Outline HMP for the site will be included as an Appendix to Chapter 7.
NatureScot	The guidance for onshore wind farms is available on our website, and should be referred to by the developer. Where this is not followed in the EIA process, we would expect explanations to be given as to why this is the case in the EIA Report accompanying the application. Our guidance 'Visual Representation of Wind Farms' 2017 should be referred to.	A 44	Chapter 5: Landscape and Visual	NatureScot guidance has been used throughout the EIA Report to inform methodology and assessment; this including 'Visual Representation of Wind Farms' 2017 specifically. Where guidance has been used, a reference has been provided.
NatureScot	<p>Our key issues concerning the development are the landscape and visual impacts, including cumulative impacts with other proposed, consented and operational wind farms in the wider area. This includes potential impacts on the Talla – Hart Fell Wild Land Area, particularly arising from the aviation lighting that will be required on the turbines.</p> <p>There is potential for effects on the Talla - Hart Fell Wild Land Area, particularly from the night time aviation lighting required by the turbines. This will need to be assessed, with reference to our guidance 'Assessing Impacts on Wild Land 2017'.</p> <p>We have considered the potential visibility of the wind farm from the WLA using the information provided, and note that that the ZTV indicates visibility of the turbines from recreational routes within the WLA. We therefore still think that is appropriate to provide a single dusk/dawn viewpoint from within the WLA, given there are potential impacts on this nationally important</p>	A 44 and A 46 (Additional Consultation)	Chapter 5: Landscape and Visual and Chapter 13: Other Issues	The potential for effects on the Talla Hart Fells Wild Land Area is being addressed within the wild land assessment provided as Appendix 5.3 and the landscape and visual assessment of aviation lighting which is provided as Appendix 5.5.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	designation. We believe that to use a suitable viewpoint from within that particular WLA for both the Wild Land Assessment and for the night time lighting visualisation is a proportionate approach.			
NatureScot	We provide no comment on the proposed viewpoints at this time, but would be pleased to offer advice on these once there is more certainty about the turbine layout.	A 44	Chapter 5: Landscape and Visual	An updated viewpoint list was issued to NatureScot on the 22 July 2020.
NatureScot	NatureScot provided a response to the updated viewpoint list on the 4 August 2020 to say: "In our previous response and in the VC meeting we highlighted that we were particularly keen to have a VP from Hart Fell, and this has now been included (VP15), so thank you for that. Given this inclusion we are content with the viewpoints included and approach taken in the documentation provided, and we look forward to the landscape and lighting assessments."	Additional Consultation	Chapter 5: Landscape and Visual	Response noted.
NatureScot	We agree that impacts on the National Scenic Areas (NSAs) listed can be scoped out of the EIA (paragraph 5.7.2).	A 44	Chapter 5: Landscape and Visual	Response noted.
NatureScot	At this stage in our understanding of the proposal, we do not consider that this wind farm is likely to have an impact on any sites designated for their nature conservation interest.	A 44	Chapter 7: Ecology and Biodiversity	Response noted supported by information set out in Chapter 7.
NatureScot	Based on the contents of the Scoping Report (e.g. paragraphs 7.5.1 and 7.5.2) and our guidance relating to the connectivity of proposed developments with Special Protection Areas (SPA); our advice is that, despite some potential for connectivity there is no likely significant effect from this wind farm proposal on the qualifying interests of Castle Loch, Lochmaben SPA and Upper Solway Firth and Marshes SPA. We agree that impacts on these SPAs and on migratory waterfowl can be scoped out of the EIA (paragraph 7.5).	A 44	Chapter 8: Ornithology	Response noted.
NatureScot	We note the surveys to be undertaken, and we agree with the topics to be scoped out (paragraph 6.5).	A 44	Chapter 8: Ornithology	Response noted.
NatureScot	We note the scope of surveys proposed in the Scoping Report, and consider them to be adequate for a development of this nature and scale at this location. Reference should be made to the guidance available on our website.	A 45	Chapters 5 – 13	Response noted. NatureScot guidance has been used throughout the EIA Report to inform methodology and assessment. Where guidance has been used, a reference has been provided.
NatureScot	At this stage we cannot support the assumption that one year of survey work will be sufficient to identify the bird interest of the site and adequately assess potential impacts upon them (paragraph 7.8). Given the current use of the land as commercial conifer plantation, it is probable that a single year of survey work will be sufficient, but without seeing the data and a robust justification for a single year of survey, it is not possible for us to advise on this approach at this time.  We would be pleased to receive interim reports during the first year of survey, if that would be helpful to the Applicant.	A 45	Chapter 8: Ornithology	The interim report was issued to NatureScot in July 2020.
NatureScot	After receiving the interim report, NatureScot agreed that a single year of bird survey work is appropriate for this site in a response sent on the 4 August 2020.	Additional Consultation	Chapter 8: Ornithology	Response noted.
NatureScot	We note the consideration to be given to impacts on peat.	A 45	Chapter 6: Hydrology,	Response noted.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
			Hydrogeology, Geology and Soils	
NatureScot	We would be very pleased to join ECU and Dumfries and Galloway Council staff on a site visit when current COVID-19 restrictions on movement have been lifted. Such a visit is likely to be useful to all concerned.	A 45	Chapter 2: EIA Process and Methodology and Chapter 5: Landscape and Visual	A site walkover with the NatureScot officer and Dumfries and Galloway Council Planning Case Officer took place on the 7 August 2020.  No landscape officers were present from NatureScot or Dumfries and Galloway but the site walkover gave an opportunity to look at the location of the proposed turbines and relationship with existing windfarms. Poor visibility limited the potential to visit viewpoints together.
Scottish Environment Protection Agency (SEPA)	The information outlined 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 (or explanation why this is not applicable). j) Map of proposed surface water drainage layout. k) Map of proposed water abstractions including details of the proposed operating regime. l) Decommissioning statement.  Detailed information requirements provided in an attached appendix with sets out 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.	A 35 – A 36	Chapter 4: Development Description  Chapter 6: Hydrology, Hydrogeology, Geology and Soils  Chapter 13: Other Issues	Response noted. This information is being incorporated into the relevant Appendices of the EIA Report.
SEPA	In this case, where much of the site is on peat or peaty soils, we expect the application to be supported by a comprehensive site specific Peat Management Plan.	A 36	Chapter 6: Hydrology, Hydrogeology, Geology and Soils	A site specific Peat Management Plan will be included as part of the submitted application as Appendix 6.2.
SEPA	We can confirm that habitat survey information is not required for areas which are heavily forested or recently felled.	A 36	Chapter 7: Ecology and Biodiversity	Response noted.
SEPA	Based on the information provided at this stage, it seems unlikely that any development will take place within 250m of a groundwater supply source; if this is the case it would be helpful if the EIA Report provides evidence to confirm this.	A 36	Chapter 6: Hydrology, Hydrogeology, Geology and Soils	This will be taken into account within assessments in the EIA Report.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
SEPA	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.	A 38	N / A	Response noted.
SEPA	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.	A 40	Chapter 13: Other Issues, Appendix 13.1 Forestry	A keyholing design approach has been taken. The current Forest Design Plan is being used in the preparation of the Windfarm felling and restocking plans.
<b>Internal Scottish Government Advisors</b>				
Marine Scotland (MS)	MSS recommends that the developer consults our generic scoping guidelines and carries out the following and presents the results in the EIA Report: <ul style="list-style-type: none"> <li>site characterisation surveys of the water quality and fish populations of watercourses which could potentially be impacted as a result of the proposed development;</li> <li>considers the potential impact of any felling operations on the water quality and fish populations;</li> <li>considers the potential cumulative impact on the water quality and fish populations from wind farms with hydrological connectivity to the present development; and</li> <li>contacts, if not already done so, The River Annan Trust and District Salmon Fishery Board, for information on the local fish populations.</li> </ul>	A 29	Chapter 7: Ecology and Biodiversity	The listed items are all being included within the ecology and biodiversity chapter and consultation has continued with the Galloway Fisheries Trust, which also represents the Annan District Salmon Fisheries Board.
Transport Scotland (TS)	Transport Scotland would state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager as soon as practicable, and prior to the movement of any abnormal load.	A 52	Chapter 11: Access, Traffic and Transport	A route survey has been undertaken and notes all predicted works at this time. This would be updated as and when required following the site gaining planning consent and would be undertaken in consultation with Transport Scotland.
TS	The Scoping Report (SR) states that the forthcoming EIA Report will be undertaken in line with the Institute of Environmental Management and Assessment (IEMA) Environmental Impact Assessment Guide. Transport Scotland is satisfied with this approach and would ask that potential trunk road related environmental impacts such as driver delay, pedestrian amenity, severance, safety etc be considered and assessed where appropriate (i.e. where IEMA Guidelines for further assessment are breached). These specify that road links should be taken forward for further detailed assessment if: <ul style="list-style-type: none"> <li>traffic flows will increase by more than 30%, or</li> <li>the number of HGVs will increase by more than 30%, or</li> <li>traffic flows will increase by 10% or more in sensitive areas.</li> </ul>	A 53	Chapter 11: Access, Traffic and Transport	Response noted. This approach will be included in the traffic and transport chapter as appropriate.
TS	The SR states that the daily vehicle movements during the peak period of the construction phase will be assessed against the baseline traffic conditions. Any changes in traffic levels on each of the study network links during the construction phase will be assessed in terms of percentage change and compared against the maximum vehicle capacity of each link. Transport Scotland considers this methodology to be appropriate. <p>Transport Scotland is satisfied with the proposed study area.</p> <p>We note that any assessment of traffic impacts associated with the operational phase of the development are to be scoped out. Transport Scotland considers this appropriate.</p>	A 53 – A 54	Chapter 11: Access, Traffic and Transport	Response noted.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
TS	We note that an electronic service delivery for abnormal loads (ESDAL) review is proposed to confirm the suitability of the structures on the proposed turbine component delivery route. Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should be provided with the EIA Report which identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	A 53	Chapter 11: Access, Traffic and Transport	A route survey has been undertaken and notes all predicted works at this time. This would be updated as and when required following the site gaining planning consent and would be undertaken in consultation with Transport Scotland.
<b>Non-Statutory Consultees</b>				
The British Horse Society Scotland	<p>We would like to suggest, that should the extension be allowed that alternative multi-use (catering for walkers, cyclists, horse riders and all abilities) routes be provided at all stages. And that the disruption to recreation be kept to a minimum.</p> <p>The wind farm developers should work with local recreational groups to ensure that recreational amenity after construction is hugely facilitated for both local people and tourists. A link of the Scottish Outdoor Access Design Guide has been attached to the scoping opinion for the Applicant to consider.</p> <p>Please can you ensure that the Applicant refers to horse riders and all abilities access takers in their literature and therefore becomes more inclusive and in keeping with the multi-use spirit of the Land Reform (Scotland) 2003 Act. The British Horse Society Scotland also noted that <i>"equestrianism is worth £650 million to the Scottish economy annually."</i></p>	A 9 – A 10	Chapter 12: Socio-economics, Tourism and Recreation	<p>Disruption to public access would be kept to a minimum during the construction of the Proposed Development. An AMP would be prepared as part of the CEMP to ensure access is maintained although temporary diversion may be required due to safety.</p> <p>The assessment has considered the potential effects of the Proposed Development on recreational amenity. A number of recreational enhancement measures are currently being considered and will be progressed at the next stage of the design. Recreational groups will be consulted regarding these enhancements if required.</p> <p>The assessment has considered potential effects on formal and informal users, including horse riders.</p>
BT	We have studied this Windfarm proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network using the Preliminary Turbine Locations attached.	A 11	Chapter 13: Other Issues	Response noted. No further action is required.
Crown Estate Scotland	The assets of Crown Estate Scotland are not affected by this proposal and we therefore have no comments to make.	A 12	N / A	Response noted. No further action is required.
Defence Infrastructure Organisation (DIO) / Ministry of Defence (MOD)	<p>We have calculated that your development will be detectable by, one or more MOD radars. Consequentially, we may object should you proceed with a planning application for the development in its current form. At present we are not able to state definitively that we would object, as the MOD can only accurately assess the operational impact of the development at the point in time at which we are consulted on the application by a planning authority. Whether the operational impact of the development is deemed to be acceptable or unacceptable will be dependent on a variety of constraints including, but not limited to, the proliferation of other actual and potential turbine developments in the vicinity at that time. As we are not able to predict the level of turbine development in the area around your proposal at the time that a planning application is submitted, we cannot assess the full and actual operational impact of your development.</p> <p>The turbines will be 36.7km from and detectable by the ATC radar at Spadeadam (Deadwater Fell).</p>	A 14	Chapter 13: Other Issues	The aviation section will set out the potential effects to aviation and details of ongoing discussion.
DIO / MOD	The proposed development falls within the Statutory safeguarded area around Eskdalemuir Seismological Recording Station. In order to ensure the United Kingdom can continue to implement its obligations in maintaining the Comprehensive Nuclear Test Ban Treaty, a noise	A 14	Chapter 13: Other Issues	SPR continue to sit on the Scottish Governments Eskdalemuir working group which is working towards a resolution regarding seismic noise budget constraint.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<p>budget has been allocated to regulate the development of wind turbines within a 50km radius of the array. The budget has been set at 0.336nm rms.</p> <p>At present the reserved noise budget has been reached. Therefore, the MOD must object to this application due to the unacceptable impact the proposed wind turbine would have upon the Eskdalemuir Seismological Recording Station.</p>			
DIO / MOD	Fixed Wing military low flying training takes place throughout the United Kingdom down to a height of 250ft above ground level and in certain designated areas down to a height of 100ft above ground level. A turbine development of the height and at the location you propose may have an impact on low flying operations.	A 14	Chapter 13: Other Issues	The aviation section will set out the potential effects to aviation and details of ongoing discussion.
DIO / MOD	In the interests of air safety, the MOD will request that the development should be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.	A 15	Chapter 4: Development Description Chapter 5: Landscape and Visual	The Development Description section will set out the aviation lighting requirement and the effects of the lighting will be assessed within the landscape and visual assessment of aviation lighting which is provided as Appendix 5.5.
Galloway Fisheries Trust (GFT)/ Annan District Salmon Fisheries Board (ADSFB)	GFT is also commenting in this instance on behalf of the River Annan District Salmon Fishery Board, within whose jurisdictional area this proposed development lies.	A 16	N / A	Response noted. No further action is required.
GFT / ADSFB	Having read the Scoping Report, we are pleased to note that in 6.3 fish are identified as potential sensitive receptors and that GFT are detailed as to be approached to discuss fish data. It is important to recognise that large scale felling of conifers, which is presumably required for this development, often causes water quality and fisheries impacts especially where planting has occurred on peat. This will need to be considered fully in the EIA and a robust water quality monitoring programme put into place.	A 16	Chapter 6: Hydrology, Hydrogeology, Geology and Soils and Chapter 7: Ecology and Biodiversity	A monitoring plan will be included within the EIA Report.
GFT / ADSFB	Watercourses across the site, primarily the Water of Ae, Glenkiln Burn, Clachanbirnie Burn, Clatterstones Burn, Wreaths Burn, Davies Burn, Kirkland Burns and Kinnel Water catchment, all have the potential to support important fish populations (including salmonids). Fish may also be present in smaller, more minor tributaries of the above watercourses.	A 16	Chapter 7: Ecology and Biodiversity	A Fish Habitat Walkover and electric fishing survey has been conducted, as reported in Chapter 7.
GFT / ADSFB	We are aware that there were significant water quality and fisheries impacts associated with the construction of the nearby Harestanes Wind Farm a few years ago. It is essential that there is no repeat of these impacts.	A 16	Chapter 6: Hydrology, Hydrogeology, Geology and Soils and Chapter 7: Ecology and Biodiversity	Response noted. Water protection measures will be included.
GFT / ADSFB	We note that 'fish' were not included for baseline surveys under 6.7. It is usual practice to establish baseline data for fish populations within and downstream of construction developments. The status of these fish populations must be known so any potential impacts leading from construction can be measured. A properly designed fisheries survey, including electrofishing, should be undertaken prior to the construction of the development to establish a robust baseline. It would be prudent for this baseline to be established prior to the EIA being compiled so that information gained from these surveys can also feed into the planning and design process, such	A 16 – A 17	Chapter 7: Ecology and Biodiversity	An Aquatic Ecologist (who has attended training on the Scottish Fisheries Coordination Centre (SFCC) Fish Habitat Survey methods) has undertaken a Fish Habitat Survey, which was used subsequently to inform the requirement for electrofishing surveys, which have since been undertaken where appropriate to do so. The survey findings will be presented in the EIA Report.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<p>as micro-siting watercourse crossings and identifying specific mitigation measures to protect fish species and their habitats.</p> <p>We would expect that the presence of certain fish species across and downstream of the site will probably be assumed, and that it is likely that the EIA will identify that good practice guidelines are intended to be followed to limit potential impacts on fish species within the catchments, however this should be the case over and above the formation of an up to date, robust, baseline fisheries assessment. Following best practice guidelines to limit impacts on fish species is fully expected across such developments, but if there is no baseline upon which to measure an impact, the severity of any impact cannot be ascertained.</p>			
GFT / ADSFB	<p>Full details of a fish monitoring plan should be included in the EIA and/or should be included in a Construction Ecological Monitoring Plan or equivalent. This should include during construction and post construction surveys (assuming the pre-construction surveys have already been completed), and electrofishing surveys must be undertaken to recognised standards, e.g. SFCC protocol, by an organisation experienced in monitoring developments such as wind farms. We would like to have the opportunity to provide comments and input on the fish monitoring programme to ensure it is suitable for this site and the proposed construction works. We would also be happy to input to the EIA process.</p>	A 17	Chapter 7: Ecology and Biodiversity	Should a Fish Monitoring Plan be required, this will be included within the Construction Ecological Monitoring Plan and this document would be provided to GFT for acceptance. The EIA report will make a commitment to the preparation to the Construction Ecological Monitoring Plan.
GFT / ADSFB	<p>In general, the following have the potential to impact fish species and their habitats. These points/potential issues are of concern and interest to GFT and the Annan District Salmon Fishery Board. These issues should be covered within the EIA:</p> <ul style="list-style-type: none"> <li>• access track layout in relation to the proximity to sensitive fish habitat (e.g. spawning habitat);</li> <li>• the number of watercourse crossings (new and upgraded);</li> <li>• the location of new and upgraded watercourse crossings;</li> <li>• new and upgraded watercourse crossing type, design, and structure, including information relating to the installation of each crossing point (e.g. maintaining the existing gradient, maintaining fish access at all water heights etc.);</li> <li>• construction information for new tracks (including layby locations), trackside drainage plans and designs especially in relation to increased run off rates;</li> <li>• turbine base locations;</li> <li>• turbine base excavation and associated run off from loose ground;</li> <li>• peat depth information in relation to water quality, peat slides or ground slips;</li> <li>• borrow pit locations;</li> <li>• any forestry felling activities, particularly in riparian areas;</li> <li>• any forestry re-planting plans, particularly in riparian areas;</li> <li>• changes to instream hydrological conditions and flush zones;</li> <li>• exacerbated erosion and/or elevated levels of suspended silt to watercourses during construction activities;</li> <li>• water quality monitoring information;</li> <li>• pollution to watercourses in the form of silt pollution;</li> <li>• pollution to watercourses in the form of chemical pollution;</li> <li>• reduction in quantity and quality of instream habitat;</li> <li>• adverse changes to instream morphology;</li> <li>• direct mortality of fish species;</li> <li>• mitigation measures to protect fish population and their habitats from the impact from all of the above;</li> </ul>	A 17	<p>Chapter 6: Hydrology, Hydrogeology, Geology and Soils</p> <p>Chapter 7: Ecology and Biodiversity</p>	These issues will be addressed in the EIA Report.

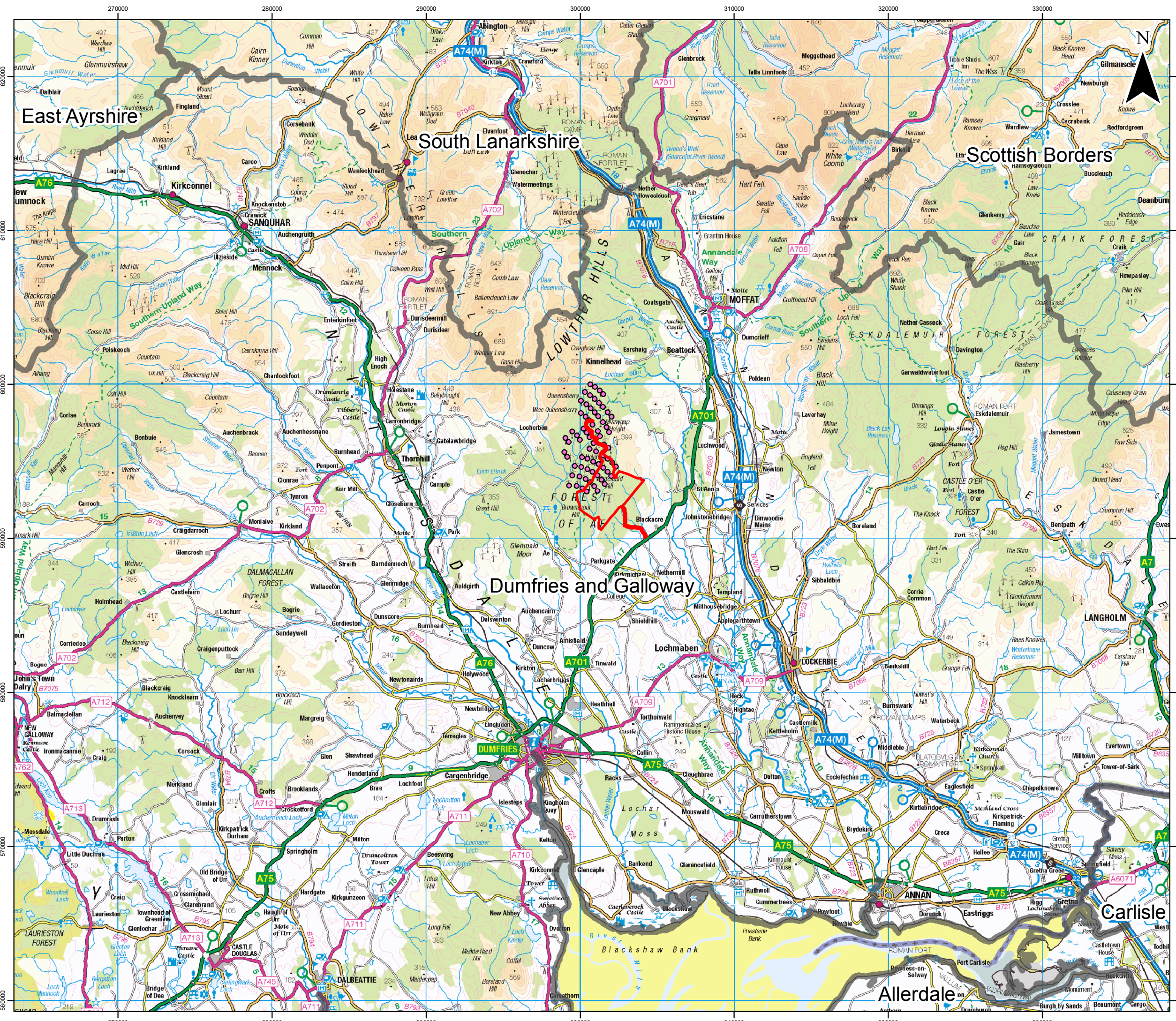


Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
	<ul style="list-style-type: none"> <li>timings of specific works such as new track building, new watercourse crossing installation, upgrading of existing watercourse crossings; and</li> <li>mitigation measures to protect watercourses, fish and their habitats – that which is built in to the design of the development and any additional mitigation measures which will be employed if required.</li> </ul>			
Glasgow Prestwick Airport (GPA)	GPA consider the proposed study areas as appropriate. However the proposed windfarm lies within the range of its primary radar – and if any of the turbines are visible to the radar – then GPA would require to object on aviation safety grounds.	A 18	Chapter 13: Other Issues	None of the turbines are in radar line of sight of the GPA radars and they are unlikely to be detected.
GPA	<p>GPA considers the following to be appropriate:</p> <ul style="list-style-type: none"> <li>Proposed methodology to assess effects on landscape and visual receptors (including cumulative effects);</li> <li>Cumulative assessment;</li> <li>Landscape or visual receptors to be considered within the assessment; and</li> <li>The landscape and visual receptors proposed to be scoped out.</li> </ul> <p>GPA agrees with the baseline collection approach for the noise, traffic and transport, socio-economics, recreation and tourism and topics within the 'Other Issues' chapter.</p> <p>GPA does not believe there are any key issues or possible effects which have been omitted.</p>	A 18 – A 19	Chapters 5 – 13	Response noted.
Joint Radio Company	<p>This proposal cleared with respect to radio link infrastructure operated by Scottish Power and Scotia Gas Networks.</p> <p>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.</p> <p>It should be noted that this clearance pertains only to the date of its issue. Developers are advised to seek re-coordination prior to considering any design changes.</p>	A 26 and A 28	Chapter 13: Other Issues	Response noted. Final turbine positions to be advised.
Kirkmichael Community Council (KCC)	<p>Landscape and visual receptors, I would like to comment that the report never mentions the settlements of Parkgate and Nethermill that are within the Kirkmichael Parish, (within which is the proposed access road into Ae forest) and likely to see the proposed turbines.</p> <p>Table 5.3 showing the proposed viewpoints mentions the A701 near Kirkland but nowhere else within the parish. It does mention considering residents with 2km of proposed turbines and users of the A701 but a viewpoint from Nethermill and Parkgate would be appreciated.</p> <p>In section 5.2 (named residential areas) there is still no mention of Parkgate or Nethermill.</p>	A 27	Chapter 5: Landscape and Visual	The LVIA considers the effects on the settlements of Parkgate and Nethermill. These areas are represented by viewpoints 2, 3 and 16.
KCC	Appendix A: Figures is a blank page where I would expect to see maps of the proposed area. Figures 2.1, 5.1, 5.2 all refer to site locations but I cannot seem to access these.	A 27		The figures were issued as separate documents alongside the Scoping report.
KCC	Cultural Heritage – are you aware that there is a grave in close proximity to turbine T14? It is that of James Ferguson, late of Burrance of Courance Farm, who was buried in 1964.	A 27	Chapter 10: Archaeology and Cultural Heritage	The asset is known and listed within the HER, albeit incorrectly referenced, and was visited during the walkover survey. It is included in the EIA Report

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
Royal Society for the Protection of Birds (RSPB) Scotland	<p>We agree with the proposed scope of survey work and assessment of impact to sensitive habitats on site. We agree with the proposed scope of assessment for impacts and survey work for ornithology at this site, in particular for raptor species, moorland waders, black grouse and nightjar all of which are known to be present in the general area of this project. In particular, our records confirm that there are good numbers of breeding waders and the presence of black grouse within 10km of the project boundary.</p> <p>We agree with the level of survey work proposed to inform the presence of and mitigation of impact to deep peat and other GWD sensitive habitats on site.</p>	A 33	Chapter 6: Hydrology, Hydrogeology, Geology and Soils and Chapter 8: Ornithology	Response noted.
RSPB Scotland	<p>We would advise that survey for migratory pink-footed geese is included for survey and assessment and is included as a sensitive receptor species.</p> <p>Our own data confirms foraging pink-footed geese 3km south of the boundary for this proposal, we would recommend that survey for migratory species including pink-footed geese is not scoped out of further assessment. The limited vantage point winter survey already completed has recorded flights of pink-footed geese and this is without the results of spring passage being confirmed which we would suggest will further support this recommendation. Furthermore, research on the foraging range of pink-footed geese associated with the Upper Solway Firth Flats and Marshes SPA and Castle Loch SPA confirms range within the vicinity of this proposal. We therefore, disagree with the conclusion that migratory waterfowl should be scoped out of assessment.</p>	A 33	Chapter 8: Ornithology	<p>Advice to include survey for migratory waterfowl is contrary to NatureScot response which agrees with approach to scope out.</p> <p>Further information justifying the approach commented on above was provided in a response by WSP to RSPB sent on the 9 June 2020.</p>
RSPB Scotland	<p>We do not agree that it can be concluded on the basis of one winter's survey work that only one year of survey work will be required to inform this development particularly since it is suggested that additional information from surrounding wind farms can be utilised. It cannot be assumed that data from consented wind farms would adequately inform this proposal and data from these sites is also likely to be over five years old. Furthermore, we would advise that this judgement is not possible until a complete years of survey work has been completed for ornithological species including breeding, wintering and vantage point watches. We would be happy to make further comment as to the requirement for additional survey work based on the results of one-year's work.</p>	A 33	Chapter 8: Ornithology	An interim report was issued to NatureScot and RSPB to demonstrate that the survey data and supporting data is justified in being for one year only.
RSPB Scotland	<p>We are in agreement with yourselves and SNH that a years' worth of survey work is sufficient to inform an environmental impact assessment for this proposal for the following reasons:</p> <ul style="list-style-type: none"> <li>Recent and historical bird survey data is available which is consistent with the data gathered in the year 1 survey. These data have been used to inform the report.</li> <li>The habitats present on site are generally thought to hold low ornithological interest.</li> <li>It appears that this development will not significantly impact any designated sites, although our final judgement on this is reserved until the full environmental impact assessment is received.</li> </ul> <p>Therefore, it is unlikely that a second years' worth of survey work will significantly change what is already known about the site.</p>	Additional Consultation	Chapter 8: Ornithology	Response noted.
Scottish Rights of Way and Access Society	<p>We have no comments to make at this time.</p>	A 34	N/A	Response noted. No further action is required.
Scottish Water (SW)	<p>A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.</p>	A 47	Chapter 6: Hydrology,	Response noted.

Consultee	Scoping Comment	Scoping Opinion Reference	EIA Report Reference	Response
			Hydrogeology, Geology and Soils	
SW	<p>Scottish Water will not accept any surface water connections into our combined sewer system. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request.</p> <p>All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.</p>	A 47 – A 48	N/A	<p>Response noted.</p> <p>This would be addressed by the Principal Contractor post-consent should it be required.</p>
The Coal Authority	<p>I have checked the site location plan against our coal mining information and can confirm that the proposed development site is located outside of the defined coalfield. Accordingly, the Coal Authority has no comments or observations to make on this proposal.</p> <p>It will not be necessary for you to consult the Coal Authority at any future stages of the Project.</p>	A 50	N / A	Response noted. No further action is required.

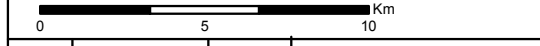
Table 4.1: EIA Scoping Opinion – EIA Report



**Legend**

- Application Boundary
- Local Authority Area
- Operational Harestanes Windfarm Turbine

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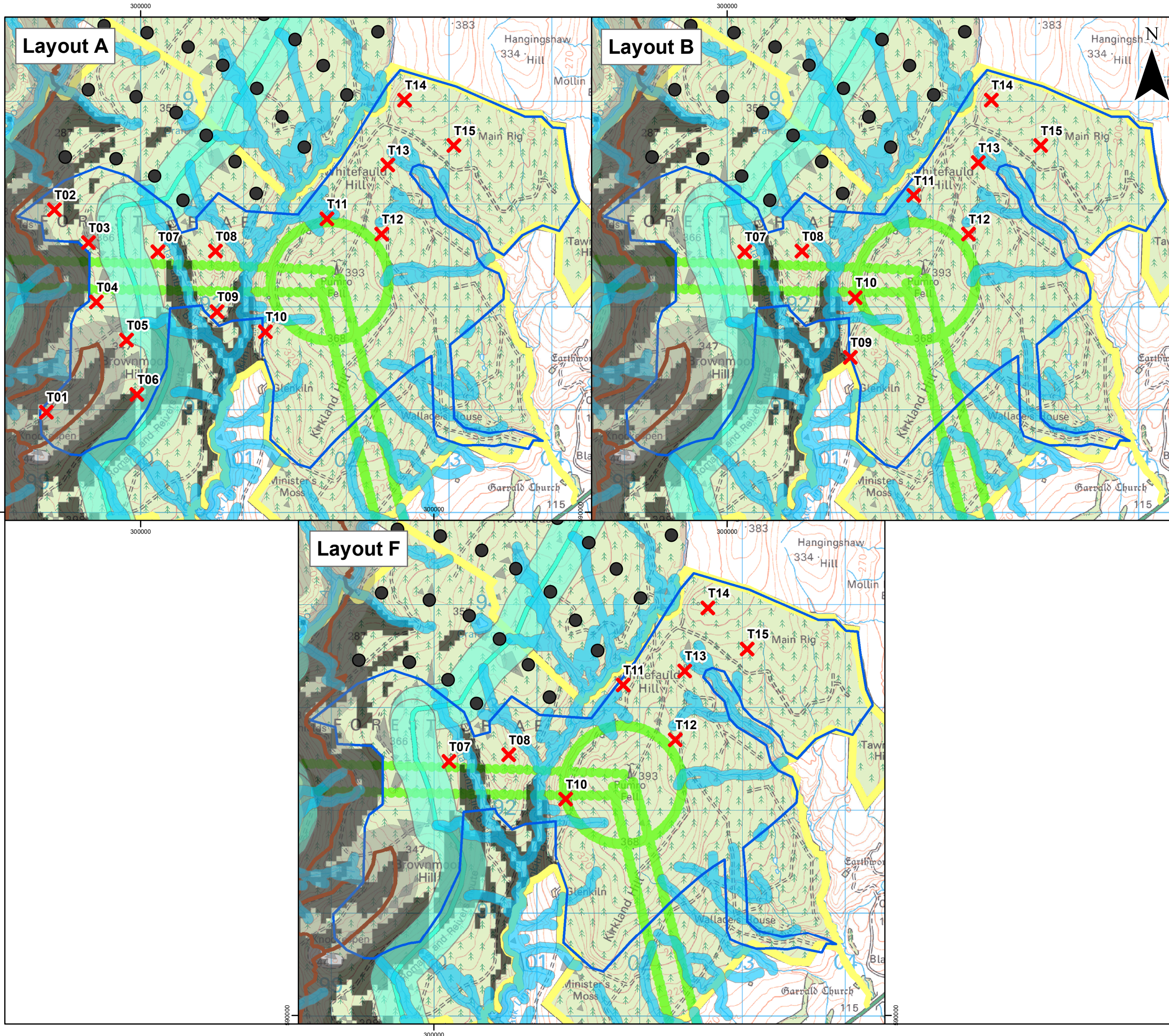


Rev	Date	By	Comment
B	14/09/2020	MS	Second Issue.
A	10/03/2020	CE	First Issue.



**Harestanes South Windfarm Extension**  
Figure 1.1: Site Location

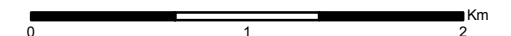
<b>Drg No</b>	HARESTANES_WSP_I_023
<b>Rev</b>	B
<b>Date</b>	14/09/2020
<b>Scale</b>	1:230,000 @ A3



**Legend**

- X Proposed Turbine
- Operational Harestanes Turbine
- Developable Area
- Watercourse Buffer
- Core Paths
- Core Path 220m Buffer
- Slope Over 14 Percent
- 7Stanes Mountain Bike Trail
- 7Stanes Mountain Bike Trail 220m Buffer
- Telecommunications Link Exclusion Zone

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Rev	Date	By	Comment
A	17/09/2020	PM	First Issue.



**Harestanes South Windfarm Extension**  
Figure 3.1 Design Iteration of Turbine Layouts A, B and F

<b>Drg No</b>	HARESTANES_WSP_I_115
<b>Rev</b>	A
<b>Date</b>	17/09/2020
<b>Scale</b>	1:35,000 @ A3

**Harestanes South Windfarm Extension Project Team**

ScottishPower Renewables  
9th Floor ScottishPower Headquarters  
320 St Vincent Street  
Glasgow  
G2 5AD

**[HarestanesSouthWindfarm@scottishpower.com](mailto:HarestanesSouthWindfarm@scottishpower.com)**

