

Technical Appendix

Lairdmannoch Energy Park

Technical Appendix 2-2: ECU Gatecheck Report

Lairdmannoch Energy Park Limited

wind2

May 2025



Gate Check Report

Lairdmannoch Energy Park

Gate Check 1 Report

Lairdmannoch Energy Park Ltd

wind2

February 2025



Contents

1	Introduction	2
1.1	The Applicant	2
1.2	Purpose of Report	2
2	Stakeholder Consultation	4
2.1	Pre-Application Responses	4
2.2	EIA Scoping Responses	4
2.3	EIA Report Requirements	7
2.4	Landscape and Visual	10
2.5	Ornithology	15
2.6	Ecology	20
2.7	Geology, Peat, Hydrology, and Hydrogeology	22
2.8	Noise	36
2.9	Cultural Heritage	38
2.10	Traffic and Transport	48
2.11	Land Use, Socio-economics, Tourism and Recreation	59
2.12	Climate Change, Carbon Balance and Sustainability	60
2.13	Other Considerations (including aviation and telecommunication)	60
2.14	Further Consultation	66
3	Public Consultation	70
3.1	PAC Report	70
4	Design Iterations	72
4.1	Design Consultation	72
4.2	Design Iterations	78
4.3	Design Freeze Summary	80
5	Landscape Viewpoints	82
6	Submission Timescales	84

Contents

Tables

Table 2-1: EIA Scoping Responses Status	4
Table 2-2: EIA Scoping Opinion - EIA Requirements	7
Table 2-3: EIA Scoping Response – Landscape and Visual	10
Table 2-4: EIA Scoping Response – Ornithology	15
Table 2-5: EIA Scoping Response – Ecology	20
Table 2-6: EIA Scoping Opinion - Geology, Peat, Hydrology and Hydrogeology	22
Table 2-7: EIA Scoping Opinion – Noise	36
Table 2-8: EIA Scoping Response– Cultural Heritage	38
Table 2-9: EIA Scoping Response – Traffic and Transport	48
Table 2-10: EIA Scoping Opinion – Socio-Economics, Recreation and Tourism	59
Table 2-11: EIA Scoping Opinion – Other Considerations	60
Table 2-12: Further Consultation	66
Table 4-1: EIA Scoping Opinion – Design Considerations	72
Table 4-2: Main Design Iterations to Date	78
Table 5-1: Landscape Viewpoints	82

Figures

- Figure 1: Site Location Plan
- Figure 2: Proposed Development Layout

1 Introduction

Lairdmannoch Energy Park Ltd ('the Applicant') is intending to apply for Consent under Section 36 of the Electricity Act (Scotland) 1989 (as amended) to develop an energy park consisting of up to nine wind turbines up to 180m in tip height, ground mounted solar panels, a battery energy storage system (BESS) and associated infrastructure including electrical transformers, hardstandings, access roads, cabling, borrow pits and a electrical substation (the 'Proposed Development').

The estimated capacity of the Proposed Development is anticipated to be 100MW (comprising 60MW wind, 20MW solar and 20MW battery storage).

The Proposed Development Site (the 'Site') would be located approximately 7km north east of Gatehouse of Fleet centred on National Grid Reference (NGR) NX 66233 62404, and within the local planning authority of Dumfries and Galloway Council (D&GC).

1.1 The Applicant

Lairdmannoch Energy Park is being developed by Lairdmannoch Energy Park Ltd, which forms part of a joint venture between Wind2 and companies managed by Octopus Energy Generation.

The founders of Wind2, together with the Wind2 team, have a substantial track record in the successful development of renewable technologies throughout the UK, being responsible for the delivery of approximately 1 GW of renewable energy through their involvement with RDC Partners and West Coast Energy, sold to ENGIE in 2014.

Wind2 is working on the development of a number of subsidy free renewable energy projects throughout the UK and is committed to investing in Scotland with personnel based in offices in Perth, Edinburgh and the Black Isle.

Octopus Energy Generation are one of Europe's largest investors in renewables, operating £4 billion of green energy generation across seven countries. Octopus Energy Generation operate solar and wind projects across the UK.

1.2 Purpose of Report

The Applicant undertook initial engagement with D&GC through the Pre-Application Enquiries Service with a request submitted in October 2020 (Ref: 20/04174/PREMAJ). At the time of this pre-application consultation the Proposed Development consisted of 12 wind turbines (and featured no solar panels or battery storage) at 180m tip height plus associated infrastructure.

A pre-application response was received from D&GC in January 2021, which included responses from key consultees such as the D&GC Landscape Officer, NatureScot, Scottish Environment Protection Agency (SEPA) and Historic Environment Scotland (HES).

The Applicant also undertook pre-application consultation with the Scottish Government Energy Consents Unit (ECU), with a meeting to introduce the Proposed Development held in July 2023.

The Applicant submitted a request for Environmental Impact Assessment (EIA) Scoping Opinion in relation to the Proposed Development to the ECU in August 2023. The Applicant received an EIA Scoping Opinion from the ECU in January 2024.

As a result of the consultation and EIA process, the Proposed Development has reduced from 12 turbines at 180m to blade tip (presented at the pre application stage) to nine turbines of up to 180m to blade tip plus ground mounted solar panels and battery storage (presented at the EIA scoping stage).

In accordance with the ECU Good Practice Guidance, this Gate Check Stage 1 Report ('this Report') sets out the how the Applicant will address the matters set out in the Scoping Opinion in the EIA Report (EIAR).

In addition, this Report provides an update on the status of the Proposed Development and progress with the EIA. It summarises the design iteration process which the Applicant has undertaken to date and how the Applicant has responded to the consultation comments received on the Proposed Development to date.

2 Stakeholder Consultation

This Section sets out the consultation that has been undertaken and the feedback that has informed the current proposed layout.

2.1 Pre-Application Responses

It is worth noting that a number of consultees responded to the request for pre application advice in 2021. These consultee responses have not been included within this gate check report as their EIA scoping response supersedes it.

The following pre application consultee responses are an exception to this and have been included for completeness:

- Senior Planner Built Heritage – pre application response received but no response to EIA scoping therefore pre application response has been included as it details key cultural heritage points;
- Flood Risk Management – pre application response received but no response to EIA scoping therefore pre application response has been included as it details key hydrological points;
- D&GC Landscape Officer – pre application response received but no response to EIA scoping therefore pre application response has been included as it details key landscape.
- NatureScot – pre application response and EIA Scoping response received, both have been included as both raise key landscape points.

2.2 EIA Scoping Responses

Responses to the request for a Scoping Opinion were received from the following consultees as set out in **Table 2-1**.

In respect of the consultees who did not respond, it is assumed they had no comment to make on the Scoping Report.

Each of the consultees will be consulted again by the ECU when the application is submitted.

The Applicant has also undertaken additional consultation throughout the EIA process.

Table 2-1: EIA Scoping Responses Status

Consultee	Status
Arqiva	Response Received
Atkins	Response Received
Balmaghie Community Council	Response Received
BT	Response Received
Crossmichael and District Community Council	Response Received
Dumfries and Galloway Council EHO	Response Received
Dumfries and Galloway Council Roads Planning	Response Received
ECU	Response Received
Edinburgh Airport	Response Received
Glasgow Airport	Response Received

Consultee	Status
Glasgow Prestwick Airport	Response Received
Help Save Mochrum Fell Group	Response Received
Highlands and Islands Airport Limited	Response Received
Historic Environment Scotland	Response Received
JRC	Response Received
Marine Directorate – Science Evidence Data (MD-SEDD)	Response Received
Met Office	Response Received
MLL Telecom	Response Received
MOD	Response Received
NATS	Response Received
NatureScot	Response Received
Office for Nuclear Regulation	Response Received
RSPB Scotland	Response Received
Scottish Water	Response Received
SEPA	Response Received
The Coal Authority	Response Received
Tongland and Ringford Community Council	Response Received
Transport Scotland	Response Received
Twynholm Community Council	Response Received
Virgin o2	Response Received
Vodafone	Response Received
Woodland Trust	Response Received
British Horse Society	Did Not Respond
Civil Aviation Authority - Airspace	Did Not Respond
Crown Estate Scotland	Did Not Respond
Nith District Salmon Fisheries Board	Did Not Respond
Fisheries Management Scotland	Did Not Respond
John Muir Trust	Did Not Respond
Mobile Broadband Network Ltd	Did Not Respond
Motorola Solutions	Did Not Respond
Mountaineering Scotland	Did Not Respond
Oban Airport	Did Not Respond
Scotways	Did Not Respond
Scottish Wildlife Trust	Did Not Respond
Scottish Wild Land Group	Did Not Respond
Visit Scotland	Did Not Respond
Borgue Community Council	Did Not Respond
Castle Douglas Community Council	Did Not Respond
Gatehouse of Fleet Community Council	Did Not Respond
Kelton Community Council	Did Not Respond
Kirkcudbright Development Trust	Did Not Respond
Royal Burgh of Kirkcudbright and District Community Council	Did Not Respond

The following sections detail the comments received as part of the EIA Scoping Opinion and the Applicant's responses.

2.3 EIA Report Requirements

The following comments were received as part of the EIA Scoping Opinion on EIAR requirements.

Table 2-2: EIA Scoping Opinion - EIA Requirements

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
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 (Consultation Responses) and Annex B (MD-SEDD Standing Advice.)	The EIAR will summarise the consultation that has taken place and the comments received with respect to each technical discipline and how these have been addressed.	No further consultation required.
	Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the scoping report.	Noted.	No further consultation required.
	The proposed development set out in the Scoping Report refers to wind turbines, and other technologies including battery storage and solar panels. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to: <ul style="list-style-type: none"> the scale of the development (dimensions of the wind turbines, solar panels, battery storage) components required for each generating station minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage 	The EIAR will detail the maximum scale, specifications, and components of the proposed development, as well as the range of its export capacity to ensure that the EIAR has assessed the worst-case scenario. The maximum energy generation capacity will be directly aligned with the capacities and the specifications of the proposed wind turbines, solar panels and battery storage (BESS).	No further consultation required.
	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, finalisation of	A summary of further engagement that the Applicant has undertaken out with the formal pre-application and EIA scoping process is summarised in Section 2.13 of this Report and will also be detailed in the EIAR.	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.		
	The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. 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.	A summary of mitigation measures will be provided in each technical chapter, and an overall Schedule of Mitigation will be provided (in tabular form) as a separate EIAR chapter.	No further consultation required.
	This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.	Noted.	No further consultation required.
	This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted. The EIAR will incorporate the most up to date details for cumulative sites which will be addressed in all relevant chapters throughout the EIAR.	In relation to cumulative landscape and visual the Applicant will confirm with D&GC the relevant cumulative cut of date for inclusion in the assessment.
	Without prejudice to that generality, it is recommended that advice regarding the	The Applicant acknowledges the ECU's recommendation to undertake an additional	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.	scoping opinion. However, it is considered that neither the layout or the environmental baseline at the Proposed Development have changed to a degree where an additional scoping opinion is required.	
	It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments.	Noted.	No further consultation required.
	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.	A summary of further engagement that the Applicant has undertaken out with the formal pre-application and EIA scoping process is summarised in Section 2.13 of this Report and will also be detailed in the EIAR.	No further consultation required.
	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.	The Applicant undertook pre-application consultation with the ECU in July 2023 which included a meeting to introduce the Proposed Development. The Applicant has kept in regular contact with the ECU to keep them updated on the Proposed Development progress and anticipated submission timescales.	The Applicant will consult with the ECU to keep them informed of anticipated submission timescales.
	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.	A summary of specific matters raised in the scoping opinion will be provided within the relevant technical chapters of the EIAR.	No further consultation required.
	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 no more than 10 megabytes (MB).	Noted.	No further consultation required.
	The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry, although Scottish Forestry did not provide a	Noted.	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	response. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 36 of the Electricity Act 1989.		

2.4 Landscape and Visual

The following comments were received as part of the pre-application and EIA Scoping Response on landscape and visual matters.

Table 2-3: EIA Scoping Response – Landscape and Visual

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
D&GC Main Response (Pre-Application Response). No scoping response received.	Reference is made to the Supplementary Guidance (SG) - Wind Energy Development: Development Management Considerations Part D. Further Reference is made to the Dumfries and Galloway Wind Farm Landscape Capacity Study (Appendix C of the SG). Notes that the Council's Landscape Officer provides guidance in respect of the Fleet Valley National Scenic Area, representative viewpoints, and aviation lighting and night-time assessments and need for a bare ground ZTV. Notes the potential impacts on the Fleet Valley NSA and NatureScot's comments.	The Applicant has noted that the Dumfries and Galloway Wind Farm Landscape Sensitivity Study is currently out for consultation and the draft will be considered as part of the EIAR.	A further bare earth Zone of Theoretical Visibility (ZTV) was provided.
D&GC Landscape Officer (Pre-Application Response). No scoping response received.	Fleet Valley NSA Reference is made to the NatureScot response. Scope of the assessment of SLQs should be agreed with NatureScot, Anna Johnson (DGC NSA Officer) and the NSA Management Plan Steering Group if it is still running. Suggests provision of the tip and hub height bare ground ZTVs, and ideally some wirelines from key	Further information was issued to NatureScot after Scoping.	See below.

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
	viewpoints would be useful in scoping out the SLQ Assessment more thoroughly.		
	Requests reference to Dumfries and Galloway Wind Farm Landscape Capacity Study. List of landscape character types for assessment suggested.	These will be included in the LVIA.	No further consultation required.
	Viewpoint locations suggestions were provided based on ZTV only (no site work was undertaken).	These were used as the basis of the Viewpoint list submitted within the Scoping Report.	No further consultation required.
	Locations of recreational and public interest were provided.	These locations were considered for assessment within the LVIA.	No further consultation required.
	Refers to the NatureScot scoping guidance note regarding the approach and information for visualisations, assessment and mitigation.	This has been updated since this response and new guidance published by NatureScot. The latest guidance will be used as the basis of the night-time assessment presented within the LVIA.	Further consultation regarding night-time viewpoints for dawn/dusk montages has been agreed with D&GC and NatureScot.
NatureScot (Pre-Application Response)	<p>'We consider the Fleet Valley NSA could be sensitive to a development with turbines of this height, as this could conflict with the smaller more intimate scale and could detract from key focal points and features within the Fleet valley, particularly if it was visible along the enclosing easterly edge.</p> <p>We recommend that the special qualities of the NSA are reviewed and an assessment made of the proposal against them to see if these adverse effects could be reduced, removed or otherwise mitigated. We have produced draft guidance on assessing the impacts of development on special landscape qualities which is presented in Annex 1 of this letter as it is not yet available on the NatureScot website.</p>	<p>These concerns were noted and design developed to mitigate against adverse effects on the Fleet Valley NSA.</p> <p>An assessment of the Special Qualities of the NSA will be included in the assessment.</p>	

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
	At this early stage and with outline information it is difficult for us to come to a fully informed view, however noting the likely pattern of visibility across the NSA we consider that the proposal may cause significant adverse effects on the special qualities of the Fleet Valley NSA, such that the objectives of the designation and overall integrity of the area could be compromised. We might therefore object to this proposal.'		
D&GC Environmental Health Officer (Scoping Response)	Case Officer has reviewed Scoping Report and points 6. – 8 relate to landscape and visual. Five viewpoint locations have been suggested. DGC request that the <i>'EIA should consider and assess impacts on the local public/core path resource, which includes a number of paths that are adjacent to the proposed development. It should identify mitigation in relation to impacts on this resource.'</i> DGC requests that the biodiversity enhancement and improvement plan include landscape.	Further consultation was undertaken with D&GC to agree final list of viewpoints and this was agreed with D&GC on 22 May 2023.	D&GC agreed to viewpoint location amendments for both day and night-time. D&GC requested that night-time visualisations <i>'show worst-case scenario for night-time lighting, so presume at 2000 candela.'</i> This will be included within the LVIA.
NatureScot (Scoping Response)	Having reviewed the scoping report, based on the current proposed layout and the distance from the NSA at 4.1km and 6.8km respectively for the wind and solar elements of this proposal, as well as a review of the ZTV and the proposed turbine heights, we consider the proposal could significantly and adversely affect some of the Special Landscape Qualities (SLQ's) of the Fleet Valley NSA where the overall integrity of the NSA could be compromised. We would therefore be likely to object to the proposal should it be submitted in its current form.	Noted. Potential impacts on the SLQ's of the Fleet Valley NSA will be assessed as part of the LVIA within the EIAR. The latest Consultation Draft of NatureScot's Guidance on Assessing the Impacts of Development on Special Landscape Qualities will be used as a basis.	No further consultation required.
	Annex 1 provides more detail regarding the character of the NSA and the aspects which	These are noted	No further consultation required.

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
	could be sensitive to the proposed development		
	<p>NatureScot request an Assessment of Effects on Special Landscape Qualities (AESLQ), in order to interrogate these effects.</p> <p>NatureScot consider that the special qualities most likely to be affected by the proposed Development will be,</p> <ul style="list-style-type: none"> • A compact, working landscape of great charm; • The gradation from coastal islands to upland hills; • Abundance of trees and woodlands; and <p>Views out of the Fleet Valley to ... the Merrick.</p>	<p>Noted.</p> <p>Potential impacts on SLQ's of the Fleet Valley NSA will be assessed as part of the LVIA within the EIAR.</p> <p>The latest Consultation Draft of NatureScot's Guidance on Assessing the Impacts of Development on Special Landscape Qualities will be used as a basis.</p>	No further consultation required.
	<p>As a general point, it would greatly assist us if the NSA boundary was provided on all relevant plans, ZTV's, LCT etc. with adequate scaled OS mapping, given the relatively compact nature of this NSA. We suggest at a minimum a bare ground hub and tip ZTV be supplied as per our guidance. In addition to bare ground, given the wooded nature of the area, a ZTV including screening would also be acceptable. The ZTV for the wind energy development is difficult to interrogate as while the hub height information is good it doesn't provide the number of tips visible.</p>	<p>Noted and this information will be provided in the LVIA</p>	No further consultation required.
	<p>We consider the following should be considered for inclusion to cover the SQ's and how the wind farm would be perceived from within the National Scenic Area.</p>	<p>Noted.</p> <p>The Applicant has undertaken further consultation with NatureScot on 21 February 2024 regarding the viewpoint suggestions.</p>	<p>NatureScot agreed to the final list of viewpoints in the LVIA with regard to the NSA on 7 March 2024.</p>

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
ECU	The scoping report identified viewpoints at Table 4 to be assessed within the landscape and visual impact assessment. Additional viewpoints have been requested from NatureScot.	Noted. The final list of included viewpoints as part of the EIAR has been agreed with NatureScot.	No further consultation required.
	As the maximum blade tip height of turbines exceeds 150 m the LVIA as detailed in section 5.2 of the scoping report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.	Noted. The night-time assessment and aviation lighting requirements will be assessed as part of EIA within the Landscape and Visual Impact Assessment (LVIA) and aviation assessments. Night assessment viewpoints have been agreed with NatureScot and D&GC.	No further consultation required.
	The Scottish Ministers note that the proposed development is approximately 4km from the Fleet Valley National Scenic Area (NSA) at the nearest point and may therefore significantly affect some of the Special Landscape Qualities (SLQ's) of the NSA and the overall integrity of the NSA could be compromised.	Noted. Potential impacts on SLQ's of the Fleet Valley NSA will be assessed as part of the LVIA within the EIAR.	No further consultation required.

2.5 Ornithology

The following comments were received as part of the EIA Scoping Response on ornithology matters.

Table 2-4: EIA Scoping Response – Ornithology

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
NatureScot (Scoping)	We are broadly happy with the ornithological survey information presented in the scoping report. The report states that work has been undertaken according to NatureScot guidance, so it should be acceptable though, as no raw data is presented here, we cannot check this. This data should be presented in the Environmental Statement.	Noted. Two years of bird surveys have been conducted in line with the NatureScot guidance requirements. The results of which, will be incorporated in the ornithology assessment within the EIA.	No further consultation required.
NatureScot (Scoping)	We note that section 5.5.2 makes reference to access restrictions during raptor surveys. This will need to be discussed fully in the EIA and justification of the adequacy of the survey coverage given. We acknowledge the late start to the first season of breeding bird surveys due to covid restrictions, however the second season coverage started earlier so we are reasonably comfortable that overall coverage will be adequate.	Noted.	No further consultation required.
NatureScot (Scoping)	In section 5.5.3 we note that Dumfries and Galloway Raptor Study group are still to be contacted. We advise that as per our guidance, this should be done earlier when planning surveys. The data requested from external sources should also cover the solar aspect of the proposal.	Noted.	No further consultation required.
NatureScot (Scoping)	We note that no flights have been recorded for Greenland white-fronted geese (GWFG) during vantage point surveys, but we are aware from communication with RSPB Scotland that GWFG from the Loch Ken and River Dee Marshes Special Protection Area have been recorded from tagging studies travelling directly over the proposed location. Data should be obtained from the RSPB to determine the level of activity here and an assessment made as to the requirement	Noted.	No further consultation required.

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
	for any additional work to inform the assessment.		
	<p>With respect to the specific questions in section 5.5.7 we advise that:</p> <ul style="list-style-type: none"> • Black grouse and raptor surveys would have been advisable, although data from alternative sources may be available which may give adequate information. • We agree that a population viability model should be undertaken for red kite given the high level of activity recorded and potential effects that may result on the wider population. • We are happy with the species identified for collision risk monitoring (not withstanding any further data that may be obtained for Greenland white-fronted geese). • We did not find information identifying which developments have already been identified in terms of looking at the cumulative effects, but given the potential significant impacts on red kite, this coverage will likely need to be extensive and should follow our cumulative assessment Which is here in this link to Nature.scot website - cumulative assessment guidance 	Noted.	No further consultation required.
RSPB	<p>We have the following comments with regard to the ornithology chapter in the Scoping Report. Without prejudice to our recommendations and comments below, we note that more than two years of field surveys has already been completed prior to Scottish Ministers issuing a Scoping Opinion for the EIA. A scoping exercise should help inform survey design and assessment of impacts: it is therefore disappointing to note that surveys have already been undertaken prior to this exercise. We would welcome information as to why this approach has been taken.</p>	<p>Information on this matter was provided to RSPB by letter on the 3rd July 2024. Timing of scoping is driven by many factors but the Onshore Wind Sector Deal identifies that scoping should be carried out at a time when there can be an informed focus on potentially significant effects. This does mean some survey work will need to be done to inform scoping.</p>	No further consultation required.

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
	Loch Ken and River Dee Marshes Special Protection Area (SPA) - Under the requirements of the Conservation of Habitats and Species Regulations 2017, the competent authority must consider on a precautionary basis whether the proposed project is likely to have a significant effect on the SPA either alone or in combination with other plans or projects.	Noted.	No further consultation required.
	The closest SPA, the Loch Ken and River Dee Marshes SPA is located approximately 5.2 km from the proposed development site and is designated for supporting internationally important populations of overwintering Greenland White-fronted Geese and Greylag Geese. These species are vulnerable to collision with onshore windfarms during migration. The proposed development is within the core foraging ranges of these qualifying species, as per Table 2 in NatureScot's guidance on 'Assessing Connectivity with Special Protection Areas (SPAs)' (2016). Furthermore, the proposed development lies between a known roosting site at Loch Whinyeon loch and the SPA overwinter ground which increases the probability that the birds will fly through the proposed development area. Likely significant effects on the SPA therefore cannot be ruled out and the competent authority must carry out an Appropriate Assessment.	Noted. The decision as to whether an Appropriate Assessment is required is one for the competent authority, as advised by NatureScot.	No further consultation required.
	We recommend that survey effort as part of the EIA, which will also inform the HRA process, should include evening (dusk) and dawn survey to assess movements of SPA qualifying species Greenland White Fronted Goose in relation to roosting habitat at Loch Whinyeon in relation to this project.	Dawn and dusk surveys were carried out in the first winter of surveys; no goose flights of any species were recorded around dawn or dusk.	No further consultation required.
	We also recommend that a data request is made to confirm movements of roosting qualifying Greenland White-fronted geese between the Loch Ken and River Dee SPA and Loch Whinyeon to inform the HRA process; for this we recommend contacting Dr Larry Griffin (ecolg2021@gmail.com).	Noted.	No further consultation required.

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
	Breeding raptors - We note the reference to consultation with RSPB on sensitive species as part of confidential information (2019) (5.5.1). We ask that this information is provided to RSPB Scotland since we do not have record of this.	Information was provided to RSPB by letter on the 3 rd of July 2024	No further consultation required.
	Black Grouse - We note that survey effort in both years to record lekking Black Grouse was conducted outside the lekking season in year 2 which is end of March to mid-May. Although we note that the EIAR states that a lek survey in year one was carried out in May it is not specified if this was before mid-May. We therefore, recommend that this survey should be updated with formal lek survey methodology within the lekking season. The status of Black Grouse would be further informed through data request to RSPB Scotland (dataunit@rspb.org.uk) and Forestry and Land Scotland.	Noted.	No further consultation required.
	Survey work and buffer areas - We note that survey areas were identified based on buffer areas from the turbine array rather than the whole development footprint. NatureScot guidance recommends survey to encompass the entire development area which is not in line with NatureScot Guidance (2017): The survey area and design must adequately cover the entire development area, i.e. the largest possible layout, all the alternative layouts and ancillary structures and works. This includes access tracks; borrow pits, electrical substations and grid connections (both underground and overhead). (pg 10).	The approach was taken based on the information available when the project commenced. The survey work has covered the development area, where necessary supplemented by further surveys to ensure guidance is met.	No further consultation required.
	Red Kite - We agree that based on the information provided in the Scoping Report that a PVA to assess impact to Red Kite is required.	Noted.	No further consultation required.
	Collision Risk Modelling - With regard to information provided in Table 9 in the Scoping Report, we are unable to confirm if any other species should be included in the collision risk modelling until we have assessed the full results of all survey effort including VP survey that will be carried out as part of	Noted. It is unfortunate that RSPB have not engaged on this matter, The Applicant will proceed as set out in the Scoping Report	No further consultation required.

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
	the EIA. There is no detail of the results of Nightjar survey which may require CR assessment.		
	Cumulative impact assessment - We recommend that the cumulative assessment should include all projects within the search area, including new forestry/woodland creation.	The Applicant requested further information on this in our letter of the 3 rd of July and explained that including 'all projects' within the NHZ was not a realistic proposition since it will include many projects which will have no effect on ornithology receptors, or where the effects are very localised, nor does the Applicant have any visibility of any new forestry/woodland creation. RSPB did not respond any further on this point so the Applicant has no option but to proceed as outlined in the Scoping Report.	No further consultation required.
	NPF4 – delivering positive effects for biodiversity. The nature and climate crisis are inextricably linked, and action must address this at the scale and pace required. RSPB Scotland welcomes the requirement in NPF4 policy 3 that development proposals contribute to the enhancement of biodiversity. Any potential adverse impacts including cumulative impacts on biodiversity, nature networks, and the natural environment should be minimised through careful planning and design. In particular policy 3(b) states development proposals (for major, national or those that require EIA) will only be supported where it can be demonstrated the proposal will conserve, restore and enhance biodiversity to ensure it is left in a demonstrably better state than without intervention.	Noted.	No further consultation required.

Consultee	Scoping Response Comments	Applicant Response	Further EIA Consultation
	We note in paragraph 5.4.1 that any future EIAR will "adhere to NPF4 to conserve, restore, and enhance biodiversity". We recommend an outline biodiversity enhancement plan associated with the Proposed Development is provided in the Environmental Impact Assessment Report (EIAR), with an indicative site/indicative proposals for a HMP area. RSPB Scotland recommends that access to appropriate land for this activity is secured as early in the application process as possible. We recommend the Applicant provides sufficient information on proposals for enhancement to assure the Consenting Authority that the proposed development has satisfied the requirements under NPF4.	Noted.	No further consultation required.
ECU	It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration – site specific & cumulative – should be made following discussion between the Company and NatureScot.	Noted. Survey requirements for ornithology have been carried out following NatureScot guidance. Standing NatureScot advice limits the situations where agreement has to be sought from NatureScot regarding survey methodology.	No further consultation required.

2.6 Ecology

The following comments were received as part of the EIA Scoping Response on ecology matters.

Table 2-5: EIA Scoping Response – Ecology

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
D&GC Environmental Health Officer	The EIA should provide detail of proposed biodiversity enhancement and improvement of the landscape as mitigation. This could include inclusion of planting/forestry plans.	Noted. An Outline HMP will be prepared and will be submitted in support of the application which will include detail on proposed biodiversity enhancements and improvements.	No further consultation 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	Noted. There are no SACs where fish are a qualifying feature within 10km or within the zone of influence of the Proposed Development.	No further consultation required.

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
	<p>areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.</p> <p>MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) 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 which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.</p>	<p>As stated in the Scoping report effects on migratory fish are scoped out as watercourses which pass into the upland proposed wind farm area are small (>1m) and considered unlikely to support fish populations. In addition, the dam at NX 66586 60916 on the eastern side of Loch Mannoch is considered impassable therefore the presence of migratory fish is considered unlikely. Whilst they could be present passing through the lowland solar section of the Proposed Development Site, impact pathways are limited as the infrastructure footprint is reduced and there is not the gradient from which to manage potential sedimentation. Nonetheless best practice will be employed as well as further mitigation to manage potential impact pathways to all aquatic receptors. This mitigation will be fully explored in the assessment.</p>	<p>No further consultation required.</p>
NatureScot	<p>NatureScot is happy with the proposed scope for the assessment of Ecological receptors for the proposal.</p> <p>We are pleased to see that the scoping report makes reference to NPF4 and identifies the requirement within this policy to ensure that measures are taken to ensure biodiversity enhancement is achieved in development design. We expect this to be fully explored within the EIA and we would also encourage the applicant to develop habitat management plans that are more fully realised than is often the case at application submission stage. This will ensure that biodiversity improvement receives full consideration at approval stage and not left to post consent.</p>	<p>Noted.</p> <p>Noted.</p> <p>The Applicant intends to conserve, restore and enhance biodiversity as per NPF4. Firstly, through mitigation by design to avoid and minimise impact. An analysis of impacts on Priority Peatlands will be included in the EIAR.</p> <p>An Outline Habitat Management Plan (HMP) will be prepared and will be submitted in support of the application. This will include Priority Peatland</p>	<p>No further consultation required.</p> <p>No further consultation required.</p>

Consultee	EIA Scoping Comments	Applicant Response	Further EIA Consultation
		loss/compensation calculations in the context of NatureScot (2023) guidance Priority Peatland and other measures, as deemed appropriate, following the impact and effect conclusions of the EIAR. to satisfy the enhancement requirements.	

2.7 Geology, Peat, Hydrology, and Hydrogeology

The following comments were received as part of the EIA Scoping Response, on geology, peat, hydrology, and hydrogeology matters.

Table 2-6: EIA Scoping Opinion - Geology, Peat, Hydrology and Hydrogeology

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
ECU	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) 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.	Noted. Scottish Water noted potential impacts to DWPA associated with groundwater abstractions at Ringford, in particular the proposed solar area given its hydraulic connectivity to the Tarff Water. The Applicant is currently engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.	The Applicant is currently engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Geology chapter of the EIAR.
	Scottish Ministers request that the Company investigates the presence of any private water supplies which 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 which would be provided.	A Private Water Supplies (PWS) assessment will form part of the EIA and assessment details along with potential impacts, risks, and any mitigation will be incorporated into the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.	No further consultation required.
	Scottish Ministers consider that where there is a	Noted. The Applicant will include a Peat	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	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), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	Landslide Hazard Risk Assessment (PLHRA) as a Technical Appendix within the Hydrology, Geology and Hydrogeology Chapter of the EIAR.	
	Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	A borrow pit appraisal will be included as part of the EIAR and borrow pits will be fully assessed as part of the relevant technical disciplines within the EIAR primarily but not excluded to their potential impact on: <ul style="list-style-type: none"> • Landscape and Visual; • Ornithology & Ecology; • Hydrology, Hydrogeology, Geology and Peat; • Noise; • Cultural Heritage; and • Transport. 	No further consultation required.
D&GC Flood Risk	With reference to planning application	Noted.	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
Management (Pre-Application Response)	<p>20/1837/HLE, the Flood Risk Management Team (FRMT) have no objection after reviewing the information provided and held.</p> <p>As an internal consultee, this is a response to assist the Planning Authority's decision in this application. All queries from the applicant regarding information supplied by the FRMT should, in the first instance, be directed to the appropriate Planning Officer.</p>		
NatureScot	<p>NatureScot is happy with the proposed scope for the assessment of Ecological receptors for the proposal. Similarly, the proposed peatland assessment seems appropriate. The interpolated peatland map presented in Figure 11 shows there is scope for micro-siting of infrastructure to further minimise potential impacts on peatland, which we would expect to see investigated fully in the EIA. We are pleased that restoration options for peatland will be considered both on and off site to ensure that overall positive gain is achieved in terms of carbon management.</p>	<p>Noted. Impacts on peatland will be minimised through layout design insofar as possible, and opportunities to minimise excavation of peat through use of floating track will be adopted where appropriate. The design of the Proposed Development is described further in section 4 of this report and will be detailed further in the EIAR.</p>	<p>No further consultation required.</p>
Scottish Water	<p>Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced.</p>	<p>Noted.</p>	<p>No further consultation required.</p>
	<p>A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Ringford Boreholes supply Ringford Water Treatment Works (WTW) and it is essential</p>	<p>Noted. The Applicant is currently engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.</p>	<p>The Applicant is currently engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Geology</p>

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	that water quality and water quantity in the area are protected.		chapter of the EIAR.
	The wind farm development lies with the Ringford well field groundwater risk zone. Surface water from the area where the 9 turbines are proposed all drains initially into Loch Mannoch before entering the outflow watercourse, the Tarff Water.	Noted.	No further consultation required.
	Provided the developer follows standard guidelines to minimise and avoid polluting local watercourses there is a low risk of the well field being adversely affected by contaminated or turbid water from the turbine zone. This is mainly because Loch Mannoch will act as a primary receptor for all surface water pollution. Turbid water will settle in the loch before entering the Tarff Water outflow which is approximately 4.5 to 5.0 km upstream from the Ringford well field.	Noted. The Applicant will seek to adopt Scottish Water guidance for protection of drinking water assets in relation to avoidance of polluting of watercourses which will be detailed further within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR and the Construction Environmental Management Plan (CEMP).	The Applicant is currently engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Geology chapter of the EIAR.
	The solar panel development area is located downstream from Loch Mannoch and most of its 2 to 2.5 km riverside boundary lies within 100 m of the Tarff Water. This represents a much greater risk to water quality in the Tarff Water and is therefore a bigger threat to the well field, particularly during the construction phase. There would be a negligible risk during the normal operational phase.	Noted. The potential impact arising for the solar development on DWPA will be fully assessed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR and the Construction Environmental Management Plan (CEMP).	No further consultation required.
	The alluvial gravel aquifer at the Ringford well field is discontinuous upstream in the Tarff Water valley and so it is not possible for contaminants to travel underground from the solar farm to the well field. However, it is thought that a proportion of the abstracted groundwater at the well field comes from the Tarff Water as it passes within 50 m of the boreholes. Therefore, there is a possibility of any	Noted. The Applicant will seek to adopt best practice in relation to avoidance of polluting of watercourses which will be detailed further within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR and the Construction Environmental Management Plan (CEMP).	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	prolonged contamination in the river entering the gravel aquifer and degrading production water quality from the boreholes.		
	It is difficult to quantify this risk from the solar panels during their construction, but it will be vital that the developer arranges an effective monitoring programme for surface water, including an early warning system of any contamination in watercourses. Input to this programme from Scottish Water will be essential.	Noted. The Applicant will seek to adopt best practice in relation to ongoing monitoring which will be detailed further within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR and the Construction Environmental Management Plan (CEMP).	No further consultation required.
	Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm	Noted.	No further consultation required.
	We welcome receipt of this notification about the proposed activity within a drinking water catchment where a Scottish Water abstraction is located.	Noted.	No further consultation required.
	The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.	Noted. Measures to protect DWPA will be detailed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR and the Construction Environmental Management Plan (CEMP) and will also form part of any post consent monitoring documents including the final Construction Environmental Management Plan (CEMP).	No further consultation required.
	We would request further involvement at the more	Noted. The Applicant is currently engaging with	The Applicant is currently

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity.	Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.	engaging with Scottish Water to establish specific precautions to protect drinking water assets during construction and operation and this will be fully detailed and assessed within the Hydrology, Hydrogeology and Geology chapter of the EIAR.
	We would also like to take the opportunity, to request that 3 months in advance of any works commencing on site, Scottish Water is notified at protectdwsources@scottishwater.co.uk . This will enable us to be aware of activities in the catchment and to determine if a site meeting would be appropriate and beneficial.	Noted.	No further consultation required.
	For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. 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. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	Noted.	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
SEPA	<p>All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.</p>	<p>The Applicant will ensure that all maps and figures provided as part of the EIAR will be of an adequate scale and detailed.</p> <p>Efforts have been made to utilise existing infrastructure as much as possible to minimise the extent of new works on previously undisturbed ground.</p> <p>The design freeze layout has been achieved through the iterative design process. The alternatives considered and evaluation of these will be provided in the Design and Access Statement in support of the application.</p>	No further consultation required.
	<p>The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:</p> <ul style="list-style-type: none"> • All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. • A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse 	<p>The design freeze layout has been achieved through the iterative design process (see Section 4 of this Report). This has included minimising potential impacts on the water environment. This will be fully detailed and assessed within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.</p>	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>and drawings of what is proposed in terms of engineering works.</p> <ul style="list-style-type: none"> Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. 		
	If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	Noted.	No further consultation required.
	Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.	Noted.	No further consultation required.
	Refer to our flood risk Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be provided in support of the submission. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a FRA. Please also refer to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.	<p>Noted. A standalone Watercourse Crossing Assessment and Flood Risk Assessment will be undertaken as part of the Proposed Development and presented as a Technical Appendix to the EIAR.</p> <p>Watercourse crossings have been kept to a minimum as part of the Proposed Development design. The design principles and the level of CAR authorisation required for all proposed watercourse crossings will be detailed further within the Hydrology, Hydrogeology and Soil (including Peat) chapter of the EIAR.</p>	No further consultation required.
	The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of	An Outline Peat Management Plan (OPMP) will be prepared including all the required details of peatland condition, avoidance and minimisation of peat disturbance, excavation volumes, peat storage and reuse to accompany the EIAR.	No further consultation required.

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>access tracks, drainage channels, cable trenches or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.</p> <p>The submission must include:</p> <ul style="list-style-type: none"> • A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems. • A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. • Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included. 	<p>It is noted that during the design evolution process, avoidance of deeper peat has been a key principle of this process.</p>	
	<p>To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Developments on Peat and Off-Site uses of Waste Peat.</p>	<p>Noted. The Outline Peat Management Plan (PMP) will be undertaken in accordance with relevant guidance.</p>	<p>No further consultation required.</p>
	<p>Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the</p>	<p>Noted. An Outline Peat Management Plan (PMP) will be undertaken to detail volumes of peat associated with the Proposed Development.</p>	<p>No further consultation required.</p>

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>schedule of mitigation.</p> <p>We do not validate carbon balance assessments except in exceptional circumstances where requested by Scottish Government. Our advice on minimising peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.</p>	<p>Noted. In line with best practice guidance the Scottish Governments Carbon Calculator will be utilised to assess, in a comprehensive and consistent way, the carbon impact of the Proposed Development.</p>	<p>No further consultation required.</p> <p>The Applicant notes that the Scottish Government's carbon calculator tool has not been accessible from the host website for several months.</p>
	<p>GWDE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:</p> <ul style="list-style-type: none"> • A map demonstrating that all GWDE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. • If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDE affected. <p>Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent</p>	<p>Noted. The National Vegetation Classification (NVC) survey results have informed the final design layout, ensuring that proposed infrastructure is planned to avoid any adverse effects on the Groundwater Dependent Terrestrial Ecosystems (GWDE) in the vicinity. The survey findings, including the location of any potential GWDE will be detailed in the EIAR.</p>	<p>No further consultation required.</p>

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.</p> <p>Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:</p> <ul style="list-style-type: none"> A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it. If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. <p>Refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions for further advice on the minimum information we require to be submitted.</p>	<p>Noted. The National Vegetation Classification (NVC) survey results have informed the final design layout, ensuring that proposed infrastructure is planned to avoid any adverse effects on potential Groundwater Dependent Terrestrial Ecosystems (GWDTE) in the vicinity. The survey findings, including the location of any potential GWDTE or groundwater abstractions, will be detailed in the EIAR.</p>	<p>No further consultation required.</p>
	<p>In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 Controlling the Environmental Effects of Surface Mineral Workings (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:</p> <ul style="list-style-type: none"> A map showing the location, size, depths and 	<p>Noted. A Borrow Pit Assessment will be included in the EIAR. Justification for the proposed location of borrow pits will be provided in line with SEPA guidance. The detailed design is intended to be developed post consent.</p>	<p>No further consultation required.</p>

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>dimensions.</p> <ul style="list-style-type: none"> • A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each water feature proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with a photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works. • You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock. • A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table. • A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works. • A site map showing proposed water abstractions with details of the volumes and 		

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>timings of abstractions.</p> <ul style="list-style-type: none"> • A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily. • A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂. • Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used. • Details of how the rock will be processed to produce a grade of rock that will not cause siltation problems during its end use on tracks and other hardstandings. 		
	<p>One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration.</p>	<p>Noted. The EIAR will include a Schedule of Mitigation, supported by a comprehensive set of maps and figures.</p> <p>All proposed mitigation measures will adhere to</p>	<p>No further consultation required.</p>

Consultee	EIA Scoping Comment	Applicant Response	Further EIA Consultation
	<p>A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to Guidance for Pollution Prevention (GPPs).</p>	<p>industry best practices for pollution prevention, construction techniques, and regulatory requirements.</p> <p>Additionally, an Outline Construction Environmental Management Plan (CEMP) will be produced to support the EIA, setting out how pollution prevention measures and monitoring will be implemented during the construction phase of the development to protect the water environment.</p>	
	<p>Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA Guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed. The submission needs to demonstrate there will be no discarding of materials likely to be classified as waste as such proposals would be unacceptable under waste management licensing. Further guidance can be found in Is it waste - Understanding the definition of waste.</p>	<p>Noted.</p>	<p>No further consultation required.</p>

2.8 Noise

The following comments were received as part of the EIA Scoping Opinion in relation to noise matters.

Table 2-7: EIA Scoping Opinion – Noise

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
D&GC Environmental Health	We have no objections in principle. However, until a site specific noise impact assessment has been carried out following the principles detailed in the Assessment & Rating of Noise from Wind Farms ETSU Report ETSU-R-97, 1996 we would be unable to comment fully as to the expected impacts.	Noted. The noise assessment methodology and will be carried out in line with relevant legislation and standards.	No further consultation required.
	The site specific assessment should be carried out following the principles detailed in the Assessment & Rating of Noise from Wind Farms ETSU Report ETSU-R-97, 1996	Noted.	No further consultation required.
	We suggest that the proposal should be designed to meet the lower noise limits as specified in the ETSU-R-97 document, but where lower limits cannot be achieved the detailed reasons as to why this cannot be accomplished should be detailed in the ETSU-R-97 report within the Environmental Impact Assessment	Noted.	No further consultation required.
	We additionally suggest that a method statement for the construction project should be provided within the EIA for approval by Dumfries & 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. Guidance as to construction noise prediction methodology may be found within BS5228:2009.	Noted.	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
ECU	The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 5.8 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise.	Noted. The noise assessment methodology and will be carried out in line with relevant legislation and standards.	No further consultation required.

2.9 Cultural Heritage

The following comments were received as part of the EIA Scoping Response on cultural heritage and archaeology matters.

Table 2-8: EIA Scoping Response– Cultural Heritage

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
Historic Environment Scotland (HES)	We welcome that the potential cultural heritage effects are scoped into the assessment. We consider that the proposals have the potential to affect a number of heritage assets and therefore recommend that any EIA undertaken in support of the proposals should include a full assessment of impacts on the historic environment. This should take into account the guidance provided in the EIA handbook & the Managing Change in the Historic Environment: Setting guidance.	Noted.	No further consultation required.
	Potential direct impacts - We can confirm that there are no World Heritage Sites, scheduled monuments, category A listed buildings, inventory battlefields, or inventory gardens or designed landscapes within the proposed development boundary.	Noted.	No further consultation required.
	<p>Potential setting impacts - Careful consideration should be given to reducing and avoiding impacts on the setting of heritage assets during the design process. There are a number of historic environment assets within our remit whose settings have the potential to be adversely impacted by the current proposals. This list should not be treated as exhaustive, and it is only intended as a reference to those assets which at this stage appear most likely to experience significant impacts.</p> <ul style="list-style-type: none"> • Loch Mannoch, cairn & stone circle N end of (Scheduled Monument SM1033) • Edgerton Mote, fort 690m SW of Camelon Bridge (Scheduled Monument SM1119) • Bargatton Farm, cairn 610m S of (Scheduled Monument SM1002) 	<p>Noted. The impact on the heritage assets and their settings due to the Proposed Development has been a key driver in relation to the Proposed Development design with an overall aim to minimise any potential adverse impacts.</p> <p>All potential setting impacts will be assessed and details will be provided in the Cultural Heritage chapter of the EIAR and related Technical Appendices.</p>	Ongoing consultation with HES is currently underway.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<ul style="list-style-type: none"> • Cairntosh Hill, cairn (Scheduled Monument SM2237) • Trostrie Mote, motte (Scheduled Monument SM1133) • Pulcree Mote, motte (Scheduled Monument SM1130) • Rusco Tower (Category A Listed Building LB3299) • Anwoth Old Church Churchyard (Category A Listed Building LB3309) • Cally (Garden & Designed Landscape GDL00079) 		
	<p>We are broadly content with the proposed 10km study area for the wind development and 2km for the solar development to identify assets with the potential for effects to their setting. We would recommend that assets beyond these distances be considered in the initial assessment and any assets with long distance views which form part of their cultural significance, and which could be affected, also be included. Of particular concern are the potential impacts on the integrity of the setting of Loch Mannoch, cairn and stone circle. Further information on this asset has been provided in the annex to this letter.</p>	<p>Further assessment of the potential for significant setting effects upon assets located beyond 10km was undertaken and presented to HES in a pre-application request dated 18th December 2023. HES responded to this request on 12th February 2024 stating 'We are content that you have provided sufficient justification within your letter dated 18 December 2023 for assets within our remit beyond 10km to be scoped out from EIA assessment. We have no assets beyond 10km from the Proposed Development to propose for inclusion in the EIA report.'</p>	<p>No further consultation required.</p>
	<p>We note that a number of assets are located within or near forestry. In line with our Managing Change in the Historic Environment: Setting, guidance, any assessment should not rely on forestry and vegetation to screen potential impacts of development on the setting of assets.</p>	<p>Noted.</p>	<p>No further consultation required.</p>
	<p>We also have concerns with separation of the impacts of two individual elements of infrastructure (wind and solar) that comprise the same development. A holistic assessment of setting impacts should be undertaken to ensure that the full impacts of the proposals are considered and understood. This should take into account the guidance provided in the EIA handbook.</p>	<p>A pre-application request sent to HES on the 18th December 2023 confirmed that the Proposed Development as a whole would be assessed.</p>	<p>No further consultation required.</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	Potential cumulative impacts - We would recommend that the potential cumulative impacts of the development as a whole are looked at in combination with other developments in the vicinity. The cumulative assessment should assess the incremental impact or change when the proposed development is combined with other present and reasonably foreseeable developments.	Noted.	No further consultation required.
	We note that "Impacts on the settings of heritage assets beyond 10km of the Wind Development" are to be scoped out. We disagree with this as whilst individual assets may not have views of the development, both local and long-distance views towards and away from the assets may play a role in our understanding and appreciation of their setting. It should also be noted that reciprocal views between assets may play a role and the encroachment of the development or infrastructure in these views may impact on the assets' settings.	Further assessment of the potential for significant setting effects upon assets located beyond 10km was undertaken and presented to HES in a pre-application request dated 18 th December 2023. HES responded to this request on 12 th February 2024 stating 'We are content that you have provided sufficient justification within your letter dated 18 December 2023 for assets within our remit beyond 10km to be scoped out from EIA assessment. We have no assets beyond 10km from the Proposed Development to propose for inclusion in the EIA report.' .	No further consultation required.
	We note that "designated heritage assets outwith the ZTV" are to be scoped out for the Solar Development. We disagree with this, as a screened ZTV has been used, which incorporates the assumed screening effect provided by current vegetation cover and buildings. We do not consider this offers a reliable baseline assessment of potential setting impacts on cultural heritage assets. Trees, hedges and other forms of vegetation are vulnerable to changes in land use and farming practice, storms, disease and, as in the case of commercial forestry, can be a crop that will be removed on a specific time cycle. They cannot be considered to offer permanent, reliable screening against setting impacts.	A pre-application request sent to HES on the 18 th December 2023 provided a bare earth ZTV for the solar element of the Proposed Development and confirmed that this would also inform the assessment of potential impacts upon setting.	No further consultation required.
	We disagree with scoping out setting impacts from the	The assessment will consider access tracks	No further consultation

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	construction of access tracks. Although access tracks are more likely to have physical impacts, there is potential for setting impacts as a result of their construction which should be considered in the detailed assessment.	in its consideration of potential impacts upon the setting of designated heritage assets.	required.
	Where certain assets have been scoped out, we would suggest that the grounds for doing so are clearly laid out and clearly presented in the EIA report. We cannot comment further on assets proposed to be scoped out until this information is provided and we recommend a robust assessment of potential impacts upon setting is carried out in line with our Managing Change in the Historic Environment: Setting.	Further assessment of the potential for significant setting effects upon assets located beyond 10km was undertaken and presented to HES in a pre-application request dated 18 th December 2023. HES responded to this request on 12 th February 2024 stating 'We are content that you have provided sufficient justification within your letter dated 18 December 2023 for assets within our remit beyond 10km to be scoped out from EIA assessment. We have no assets beyond 10km from the Proposed Development to propose for inclusion in the EIA report.' HES further noted that they were content for potential impacts upon Trostrie Mote, motte (SM1133) and Pulcree Mote, motte (SM1130) to be scoped out of further assessment. Further details of the reasons for scoping out any further assets will be presented in the EIAR.	No further consultation required.
	Visualisations - Visualisations should be provided for any asset where a significant effect is identified. At this stage we therefore suggest that visualisations are likely to be required for those monuments where the potential for significant effects is identified. Where initial assessment identifies potential significant impacts on an asset, we recommend that wireframe visualisations should be produced to help analyse the impacts. If impacts are identified as significant, photomontages should be prepared to illustrate these impacts.	A pre-application consultation request was sent to HES on 18 th December 2023 and set out proposed visualisations based on HES's Scoping response. In their response to this consultation, dated 12 th February 2024, HES noted that they were content that wireframe visualisations from the following assets would be sufficient for assessing the potential impacts upon setting:	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
		<ul style="list-style-type: none"> Bargatton Farm, cairn 610m S of (SM1002); Cairntosh Hill, cairn (SM2237); Craig Hill, fort, Laurieston (SM2891); Edgerton Mote, fort 690m SW of Camelton Bridge (SM1119); Rusco Tower (LB3299); Anworth Old Church Churchyard (LB3309); and Cally (GDL00079). <p>HES further welcomed the inclusion of visualisations from Loch Mannoch cairn and stone circle N end of (SM1033) and indicated that photomontages should be provided from similar locations to the wirelines presented as CH1a-c in the consultation. In particular they noted that photomontages should be provided from:</p> <ul style="list-style-type: none"> The centre of the stone circle at SM1033, looking towards the cairn at an angle of about 300 degrees; From the centre of the cairn SM1033 looking toward the solar panels at an angel of about 120 degrees; and From the dam on the east shore of Loch Mannoch looking towards the cairn and stone circle (SM1033) at an angle of about 325 degrees. <p>The above visualisations will be provided as part of the EIAR.</p>	
	If wireframes can be provided at an early stage this may assist	Wirelines were provided to HES as part of	No further consultation

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<p>with both the potential to identify significant effects and potentially scope out any monuments if significant effects are not likely, as well as identifying if potential mitigation by design is possible. It will also assist with identifying whether wireframes will be sufficient for the detailed assessment of impacts or whether photomontages will be required. We would be happy to discuss this in more detail with the applications as the EIA proceeds.</p>	<p>the pre-application consultation in December 2023; their response regarding this is as set out in the preceding two rows.</p> <p>Wirelines were provided to HES as part of the pre-application consultation in December 2023; In their response to this consultation, dated 12th February 2024, HES noted that they were content that wireframe visualisations from the following assets would be sufficient for assessing the potential impacts upon setting:</p> <ul style="list-style-type: none"> • Bargatton Farm, cairn 610m S of (SM1002); • Cairntosh Hill, cairn (SM2237); • Craig Hill, fort, Laurieston (SM2891); • Edgerton Mote, fort 690m SW of Camelon Bridge (SM1119); • Rusco Tower (LB3299); • Anworth Old Church Churchyard (LB3309); and • Cally (GDL00079). <p>HES further welcomed the inclusion of visualisations from Loch Mannoch cairn and stone circle N end of (SM1033) and indicated that photomontages should be provided from similar locations to the wirelines presented as CH1a-c in the consultation. In particular they noted that photomontages should be provided from:</p> <ul style="list-style-type: none"> • The centre of the stone circle at SM1033, looking towards the cairn at an angle of about 300 degrees; 	<p>required.</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
		<ul style="list-style-type: none"> From the centre of the cairn SM1033 looking toward the solar panels at an angle of about 120 degrees; and From the dam on the east shore of Loch Mannoch looking towards the cairn and stone circle (SM1033) at an angle of about 325 degrees. <p>The above visualisations will be provided as part of the EIAR.</p>	
	<p>In particular, we recommend that visualisations are provided for views broadly north to Loch Mannoch, cairn and stone circle (SM1033) from the land around Loch Mannoch which the cairn and stone circle would have overlooked. These visualisations should include views towards the monument from land around Loch Mannoch and views out from the monument. The dam on the east shore of the loch may be an appropriate location for views towards the monument.</p>	<p>A pre-application consultation request was sent to HES on 18th December 2023 and set out proposed visualisations based on HES's Scoping response.</p> <p>HES welcomed the inclusion of visualisations from Loch Mannoch cairn and stone circle N end of (SM1033) and indicated that photomontages should be provided from similar locations to the wirelines presented as CH1a-c in the consultation. In particular they noted that photomontages should be provided from:</p> <ul style="list-style-type: none"> The centre of the stone circle at SM1033, looking towards the cairn at an angle of about 300 degrees; From the centre of the cairn SM1033 looking toward the solar panels at an angle of about 120 degrees; and From the dam on the east shore of Loch Mannoch looking towards 	<p>No further consultation required.</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
		<p>the cairn and stone circle (SM1033) at an angle of about 325 degrees.</p> <p>It is intended to provide the above visualisations as part of the EIAR.</p>	
	<p>We also note the scoping report states no visualisation is proposed from Edgarton Mote, fort 690m SW of Camelon Bridge (SM1119) as it would be caught in the same field of view as Bargatton Farm, cairn 610m S of (SM1002) and Craig Hill, fort, Laurieston (SM2891) and these visualisations would be illustrative of views from the mote. We do not agree with this approach as Edgarton Mote is circa 1km from the proposed development and is likely to be more sensitive to setting impacts than Bargatton Farm, Cairn and Craif Hill fort which are located 1.87km and 4.37km respectively from the proposed development. We therefore recommend a separate visualisation is provided for Edgarton Mote, fort 690m SW of Camelon Bridge (SM1119).</p>	<p>A pre-application consultation request was sent to HES on 18th December 2023 and set out proposed visualisations based on HES's Scoping response. This included a draft wireline from Edgarton Mote, fort 690m SW of Camelon Bridge (SM1119). HES confirmed that they were content with wireline from this asset was sufficient to inform the assessment in the EIAR.</p>	<p>No further consultation required.</p>
	<p>Mitigation - The EIA process should include consideration of mitigation by design to avoid, reduce or offset setting impacts on cultural heritage assets. This process should be documented within the EIA report.</p>	<p>Noted. Further consultation with HES to regard to this is planned and the EIAR will set out the design iteration process undertaken to minimise impacts upon the setting of heritage assets. Where impacts remain consideration will be given to the potential to offset these impacts.</p>	<p>No further consultation required.</p>
	<p>There are a number of nationally important historic environment assets within our remit in the vicinity of the development whose settings have the potential to be adversely impacted by the proposals as they stand. In particular, at this stage we have concerns about Loch Mannoch, cairn and stone circle (SM1033). These are further discussed in the annex to this letter.</p>	<p>Noted. The potential impact on the Loch Mannoch cairn and stone circle will be assessed as part of the Cultural Heritage chapter of the EIAR.</p>	<p>No further consultation required.</p>
	<p>Should the proposed development progress, we recommend that if impacts on the setting of monuments from turbines in</p>	<p>Noted. Further consultation with HES with regard to this is planned and the EIAR will</p>	

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<p>the proposed scheme prove capable of mitigation, this should be taken into account and inform the iterative design process. The applicant may wish to explore design options which change the development layout, turbine heights and number of turbines in order to identify whether significant adverse impacts can be mitigated. We strongly recommend that further engagement with ourselves in undertaken as the development progresses</p> <p>Further Information - Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org.</p>	<p>set out the design iteration process undertaken to minimise impacts upon the setting of heritage assets. Where impacts remain consideration will be given to the potential to offset these impacts.</p> <p>Noted. HES guidance will be taken into consideration when assessing the potential for impacts upon heritage assets.</p>	<p>No further consultation required.</p>
<p>Dumfries and Galloway Council Archaeology and Built Heritage Officers (Pre Application Response). No Scoping Response received.</p>	<p>Dumfries and Galloway Archaeology Officer was consulted at the pre-application and Scoping stages but no response was received on either occasion.</p> <p>The Built Heritage Officer provided a response to the pre-application request. The response noted that the assets most likely to be 'visually affected' would be:</p> <ul style="list-style-type: none"> • Gatehouse of Fleet Conservation Area and Listed Buildings in its vicinity; • Cally Gardens Inventory Garden and Designed Landscape; • Kirkconnell House Category B Listed Building; • Loch Mannoch Archaeologically Sensitive Area; • Loch Mannoch cairn and stone circle Scheduled Monument; • Grobdale Archaeologically Sensitive Area; and • Lauriston Hall Category B Listed Building. 	<p>The assets noted in Built Heritage Officer's response will be considered in the assessment of potential setting impacts in the EIAR. A bare earth ZTV will also be used to inform the assessment.</p>	<p>No further consultation with the Built Heritage Officer required. An attempt will be made to consult directly with the Archaeology Officer at this stage given the lack of response to date.</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	It was also noted that "woodland screening" would depend on harvesting cycles and schedules and that only woodland that is not planned on being cut should be included as a screening element in the ZTV.		

2.10 Traffic and Transport

The following comments were received as part of the EIA Scoping Response on Traffic and Transport matters.

Table 2-9: EIA Scoping Response – Traffic and Transport

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
D&GC Roads Planning Team Leader	No objections in principle to the proposal.	Noted.	No further consultation required.
	It would be appropriate that Transport Scotland be consulted with regard to any access utilising the Trunk Road network.	Noted. All the relevant details will be incorporated in the Transport & Access chapter of the EIAR.	Not required, as Transport Scotland has provided a scoping opinion response.
	It would be appropriate that any future application confirm the access route(s) and identify the full extent of proposed off-site road accommodation and mitigation works including passing place provision, carriageway strengthening, widening and alterations to road boundaries all along any proposed access route(s) necessary to permit construction traffic and the passage of component delivery vehicles (this may require land outwith the public road boundary and a separate planning consent may be required in respect of these works) and the potential impacts on utility services lying within the public road boundary.	Noted. A full swept path assessment and abnormal loads assessment will be carried out as part of the EIAR and assessment as part of the Traffic and Transport Chapter of the EIAR.	No further consultation required.
	It should be noted that the A714 through Newton Stewart would not be suitable as a route for HGVs and AIL's and as such alternatives should be sought.	Noted. The A714 is not anticipated to be utilised as part of HGV or AIL access.	No further consultation required.
	Proposals for access routes, site access and all accommodation works must be supported by swept path tracks. All accommodation works must be designed and constructed to the satisfaction of the Planning Authority in consultation with the Roads Authority and will require appropriate permits and consents to have been issued.	Noted. A swept path assessment will be carried out as part of the EIA.	No further consultation required.
	As the access route(s) has not been identified within the	Noted.	No further consultation

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	scoping report, I am unable to offer route specific advice; however, it should be noted that both route options to the proposed access(es) will cross a number of bridges/structures, many of which may be unsuitable for heavy HGVs and larger AILs, and that have limitations on safe axle loadings and/or restricted parapet widths. Where a proposed access route crosses bridges and culverts, the applicant will require to get approvals and safe axle loadings (in respect of those structures) from the Council's Engineering Services (Bridges and Structures) unit.	<p>The Applicant is still exploring the most appropriate access route to site.</p> <p>The routes to site will be fully assessed as part of the Transport Chapter of the EIAR this will include details of the navigation of bridges/structures.</p> <p>The Applicant will gain the necessary approvals for the selected access route from the required consultees post consent.</p> <p>An Outline Construction Traffic Management Plan (OCTMP) will be prepared to support the application which will consider all the requirements and agreed upon by Transport Scotland and D&GC. This will then be developed further post planning to support the construction phase of the development.</p>	required.
	All accommodation works must be designed and constructed to the satisfaction of the Planning Authority in consultation with the Roads Authority and will require appropriate permits and consents to have been issued.	Noted.	No further consultation required.
	Where public road boundaries are to be altered either for the formation of temporary accesses or for accommodation works, these should be reinstated in their original position at the conclusion of construction works (unless prior agreements have been secured with the Planning and Road Authorities)	Noted.	No further consultation required.
	It would be appropriate that any future submission/Environmental Statement include reference to a construction phase Traffic Management Plan (to be agreed in writing with the Police and the Roads Authority prior to any works commencing on site)	An Outline Construction Traffic Management Plan (OCTMP) will be prepared to support the application which will consider all the requirements and agreed upon by Transport Scotland and D&GC. This will then be developed further post planning to support the construction phase of the development.	No further consultation required.
	The CTMP should include a programme of delivery	Noted.	No further consultation

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	<p>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</p> <p>(a) no stacking of delivery vehicles occur on any part of the public road network</p> <p>(b) the safety of the public using 'core' paths is maintained; and is to be agreed in writing with the Police, Transport Scotland and Dumfries and Galloway Council Roads Authorities prior to any works commencing on site. 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.</p>	<p>The Outline Construction Traffic Management Plan (OCTMP) will include details on 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 minimise stacking of delivery vehicles and safety of the public using core paths.</p>	<p>required.</p>
	<p>Whilst it is accepted that the intention is that normal and abnormal loads will take access and egress via an 'agreed' route, there is likely to be some increase in traffic using other minor roads. There is also 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.</p>	<p>The Outline Construction Traffic Management Plan (OCTMP) will consider cumulative traffic impact from other developments.</p>	<p>No further consultation required.</p>
	<p>In the event that suitable and sufficient aggregate is not available from on-site Borrow Pits, any future submission/ES/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</p>	<p>The EIAR report will consider the percentage of stone that can be won on site and a robust assumption (based on a worst case scenario) will be used in relation to the volume of stone that will need to be imported.</p>	<p>No further consultation required.</p>
	<p>Creation of windfarm access tracks and turbine placements may generate accelerated timber extraction.</p>	<p>Dependent on the final access route selected there will be appropriate consultation undertaken with</p>	<p>No further consultation required.</p>

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	The A713, B795, C13s and A762 are all a well trafficked timber haulage route and therefore 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 during the construction period, to minimise the cumulative impact on communities and road users.	the required forest managers and timber hauliers pre-construction.	
	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.	Dependent on the final access route selected there will be appropriate consultation undertaken with the required forest managers and timber hauliers pre-construction.	No further consultation required.
	There is the possibility of other unrelated windfarm projects being constructed in the near vicinity concurrently with this project. Therefore, it would be appropriate that the CTMP acknowledge that co-ordination phasing may be required to mitigate against the cumulative traffic impact.	The Outline Construction Traffic Management Plan (OCTMP) will consider cumulative traffic impact from other developments. The EIAR chapter will also consider cumulative impacts.	No further consultation required.
	The developer will be held responsible for the immediate execution of any repairs and will be required to meet the cost of above average maintenance to the public road network arising from the concentration of heavy traffic associated with this development. This to be secured by legal agreement (Section 96)	Noted.	No further consultation required.
	The installation of the grid connection will have an impact upon public roads where the route follows a road, crosses a road or crosses a bridge on the road.	Noted. The grid connection route will be subject to a separate planning application.	No further consultation required.
Transport Scotland	It is acknowledged that development construction is anticipated to occur over a 12-month period. The site is intended to be operational for 40 years, "after which the turbines and solar panels and associated infrastructure will be decommissioned, and the site restored unless further	Noted.	No further consultation required.

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	<p>permission is obtained allowing further operation or repowering".</p> <p>The EIA Scoping Report confirms that initial review indicates that <i>"the most viable route for delivering components...is likely to be via the A75 and onto the A713 at Castle Douglas. From here components will travel along the B795"</i>.</p> <p>It is advised that assessment of the final route has not been undertaken at this stage but that it <i>"will either take the A762 and access site directly from the east or continue along the B795 to the existing forestry tracks and access the site from the North. Alternative routes will be considered as the project develops and further baseline conditions and assessments are undertaken"</i>.</p>	Noted.	No further consultation required.
	It is acknowledged that the proposed route options from the A75 trunk road (T) at that A75(T) / A713 at-grade priority-controlled junction are illustrated in Figure 12 of the Scoping Report. Note, any abnormal loads assessment should consider the whole route from where it enters the road network, e.g., the port of entry.	Noted. An abnormal loads assessment will be carried out as part of the EIA.	No further consultation required.
	It is acknowledged that the site access is provided from the local road network. Access proposals / mitigation requirements on the local road network are regarded as matters for consideration by the local authority.	Noted.	No further consultation required.
	The Scoping Report confirms that <i>"baseline traffic flow information would be obtained from existing datasets augmented by new surveys as appropriate"</i> .	Noted.	No further consultation required.
	Transport Scotland are primarily concerned with trunk road network impacts. The suitability of information informing the assessment of effects on the local road network is regarded as a matter for consideration by the local authority.	<p>Noted.</p> <p>The impacts on the local road network will be assessed and addressed in the Transport and Access chapter of the EIAR.</p>	No further consultation required.
	Existing trunk road traffic data informing the traffic and	Noted. The impacts on the local road network will	No further consultation

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	<p>transport assessment must be requested via traffic.data@mobiiie.co.uk.</p> <p>Transport Scotland would highlight that Department for Transport (DfT) traffic count data is not an appropriate source of information for the assessment of trunk road traffic impacts. As stated in the DfT website data disclaimer, <i>"traffic estimates for individual road links and small areas are less robust, as they are not always based on up-to-date counts made at these locations. Where other more up-to-date sources of traffic data are available (e.g. from local highways authorities), this may provide a more accurate estimate of traffic at these locations. It is the responsibility of the user to decide which data are most appropriate for their purpose, and if DfT road link level traffic estimates are used, to make a note of the limitations in any published material"</i>.</p> <p>Where no trunk road traffic data is available and traffic surveys are proposed, the scope of the traffic surveys must be agreed with Transport Scotland.</p>	be assessed and addressed in the Transport and Access chapter of the EIAR.	required.
	The baseline traffic data utilised must be representative of typical conditions. It is acknowledged that traffic volumes on the trunk road network in some locations may not have returned to pre-COVID-19 levels. Where this is the case, the data proposed to be utilised must be sense-checked against recent pre-COVID-19 data. It would be beneficial to confirm with Transport Scotland whether the data proposed to be utilised is appropriate in advance of the preparation of the transport and access assessment.	Noted.	No further consultation required.
	The Scoping Report does not appear to confirm the anticipated opening year of the proposed development. This must be confirmed in the EIA and an appropriate growth factor applied, e.g., National Road Traffic Forecast (NRTF) growth factor.	Noted. This will be confirmed in the EIAR.	No further consultation required.
	Section 5.7.4 of the Scoping Report sets out the proposed	A standard methodology will be followed in the	

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	impact assessment methodology and confirms that <i>"effects would be identified and quantified in terms of significance and mitigation measures identified where necessary as part of the assessment process. Discussion of the detailed scope of the assessment would be discussed with Dumfries and Galloway Council at the outset to agree the study area, sensitive receptors and baseline datasets"</i> .	preparation of the EIA Transport Chapter which will mirror that used for other EIA Transport chapters prepared for projects in Dumfries and Galloway.	
	Should additional transport and access related scoping information be prepared in advance of the preparation of the EIA transport and access chapter, this should also be issued to Transport Scotland for review.	Noted.	No further consultation required.
	It is noted that the Scoping Report does not confirm anticipated assessment assumptions, e.g., the volume / percentage of construction material required to be transported to the development site, or assessment elements proposed to be scoped out. Full details of these must be provided in the EIA, supported by appropriate justification. Regarding the volume of material required to be transported to site, Transport Scotland would advise that a worst-case scenario must be assessed. Should the volume required to be transported to site exceed that assessed, where this would alter assessment conclusions, the assessment must be updated and outcomes issued for consideration and approval by the local authority, in consultation with Transport Scotland.	Noted. All relevant assumptions, difficulties and uncertainties will be presented in the Transport & Access chapter of the EIAR.	No further consultation required.
	It is noted that the Scoping Report does not specifically confirm the proposed transport and access assessment study area. Study area road links must be clearly defined in the EIA transport and access chapter, with the points beyond which the effects of development traffic would likely be diluted clearly specified. A plan should be provided to clearly illustrate the study area extents.	Noted. The proposed study area will be defined in the Transport & Access chapter of the EIAR.	No further consultation required.
	The Scoping Report does not discuss sensitive receptors. These should be appropriately considered in the	Noted. Sensitive receptors will be defined and assessed in the Transport & Access chapter of the	No further consultation required.

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	assessment of effects where required.	EIAR.	
	<p>Trip Generation, Distribution and Construction Traffic Impacts</p> <p>It is acknowledged that the EIA will detail the potential number of daily, weekly, and total delivery numbers for the proposed development, providing confirmation of:</p> <ul style="list-style-type: none"> • Estimated construction employee trips. • The number, size, and weight of construction deliveries. • The anticipated schedule for deliveries. <p>The Scoping Report advises that this information will be considered alongside estimated construction traffic distribution and assignment "to assess the percentage impact of generated development trips on the existing road network".</p>	Noted.	No further consultation required.
	Anticipated operating hours and any associated restrictions must be confirmed in the EIA.	Noted. An Outline CEMP will be prepared and submitted in support of the application. The anticipated operating hours and associated restrictions will be documented in the Outline CEMP.	No further consultation required.
	Transport Scotland would advise that the anticipated schedule for deliveries should set out construction traffic volumes per month throughout the construction period.	The EIAR transport chapter will set out the schedule of deliveries.	No further consultation required.
	<p>It is confirmed that "where the percentage impacts exceed the IEMA Guidelines thresholds for detailed assessment, a full assessment of environmental effects would be undertaken. This would include an assessment of severance, accidents and safety, wear and tear, driver delay, pedestrian amenity, dust and dirt etc".</p> <p>It is further advised that "a matrix approach would be used (combining the magnitude of effect and receptor sensitivity) to identify the significance of the effect".</p>	Noted.	No further consultation required.
	It is noted that the Scoping Report does not confirm whether operational stage trip generation, distribution and traffic impacts will be assessed. It is acknowledged that	Operational traffic is likely to be very low and limited to infrequent site visits using 4x4s rather than HGVs. In these circumstances, it is not proposed to assess	

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	operational stage traffic associated with the proposed development is likely to be limited.	operational traffic impacts in the EIAR chapter.	
	It is acknowledged that the assessment of effects will be undertaken in line with IEMA Guidelines. This is acceptable to Transport Scotland.	Noted.	No further consultation required.
	The Scoping Report does not confirm whether an assessment of historic accidents within the study area will be undertaken as part of the EIA transport and access chapter. Transport Scotland would highlight that this is required and should include trunk road links within the assessment study area, including the A75(T) / A713 junction. The assessment should identify any accident clusters and provide full details of any mitigation requirements. Further, it should be noted that 'CrashMap' is not an appropriate source of information for the assessment of trunk road network accidents, as it may not include the latest available data for the road links assessed. Trunk road accident data must be requested from accidentdatarequests@transport.gov.scot. Also, the accident assessment study area must be clearly defined, supported by a plan illustrating the road links assessed and the severity of the accidents identified.	An assessment of Accidents and Safety will be undertaken as part of the EIAR chapter. Data will be sought from Transport Scotland for the trunk road network.	Data will be sought from Transport Scotland for the trunk road network.
	Confirmation should be sought from the local authority regarding other wind farm developments that may need to be considered. An appropriate cumulative impact assessment should then be undertaken if required. Full details of cumulative impacts should be set out, including a programme indicating the worst-case combined trip generation and associated percentage impact relative to baseline traffic levels, both in terms of total traffic and the percentage increase in HGVs. Should impacts exceed assessment thresholds, full assessment of effects should be undertaken.	A cumulative assessment will be undertaken which includes consented developments which share the same access routes as the Proposed Development.	No further consultation required.
	It is acknowledged that "where effects are identified as	The details for the likely significant residual effects	No further consultation

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	<i>being significant (in accordance with the EIA regulations), mitigation will be proposed, and a re-assessment of the effects undertaken".</i>	will be summarised in the Traffic and Transport chapter of the EIAR.	required.
	Full details of any required / proposed mitigation measures should be provided in the EIA Transport and Access chapter.	The detailed of any required / proposed mitigation measures will be provided in the Transport & Access EIA Chapter.	No further consultation required.
	Transport Scotland would advise that the preparation of a Construction Traffic Management Plan (CTMP) would be appropriate in this instance as a best practice measure, regardless of the outcomes of the assessment of effects undertaken. It is advised that it would be beneficial to provide an Outline CTMP as part of the EIA, which sets out the proposed content of the CTMP.	An Outline CTMP will be prepared and submitted as a Technical Appendix on support of the EIAR.	No further consultation required.
	The traffic and transport assessment should assess residual impacts associated with the proposed development.	Noted.	No further consultation required.
	It is acknowledged that the Scoping Report refers to pre-application comments from Dumfries and Galloway Council concerning abnormal loads assessment requirements. However, no information is provided regarding the consideration of abnormal loads in the assessment. An Abnormal Loads Assessment (ALA) is required to be prepared and submitted alongside the EIA Transport and Access chapter to enable Transport Scotland to respond to any forthcoming application.	A full abnormal loads assessment will be carried out as part of the EIAR and assessment as part of the Traffic and Transport Chapter of the EIAR.	No further consultation required.
	The following aspects should be confirmed in the ALA: <ul style="list-style-type: none"> • Port of entry for shipping of wind turbine components. • The number and dimensions of abnormal loads and transporting vehicle, i.e., weight limits, length etc. • All trunk roads to be used by abnormal load vehicles. • A route review should be undertaken considering the horizontal and vertical alignment of the preferred route(s), defining locations where a detailed swept path assessment is required. 	Noted.	No further consultation required.

Consultee	Scoping Comments	Applicant Response	Further EIA Consultation
	<ul style="list-style-type: none"> • Swept paths analysis are required for turbine blades and turbine tower sections, and associated drawings must be provided. • Key organisations to be consulted along the proposed routes should be identified. • Initial consideration of: The maximum axle loading on structures in consultation with the relevant roads agencies; clear heights in consultation with utility providers and transport agencies; roadworks or closures that could affect the passage of the loads; underground services on the proposed route; satisfaction of Police Scotland and local authority to the proposed route(s); lay-by areas that can be utilised for temporary parking; and lay-bys that can be used to let traffic pass slow moving abnormal loads. • Any other obstructions that may restrict transportation of abnormal loads. • Details of measures to mitigate the impacts of abnormal load movements. • Drawings providing details of proposed mitigation measures. • Geometry and visibility at access point(s) to / from trunk road. • Abnormal Loads Management Plan introducing measures that could help reduce the impact of abnormal load convoys. <p>The ALA must consider the full extent of the proposed abnormal loads route between the port of entry and the proposed development.</p>		

2.11 Land Use, Socio-economics, Tourism and Recreation

The following comments were received as part of the EIA Scoping Opinion on land use, socio-economics, tourism and recreation.

Table 2-10: EIA Scoping Opinion – Socio-Economics, Recreation and Tourism

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
D&GC Environmental Health Officer	The EIA should consider and assess impacts on the local public/core path resource, which includes a number of paths that are adjacent to the proposed development. It should identify mitigation in relation to impacts on this resource.	Noted. The Land Use, Socio-economics, Tourism and Recreation Chapter will consider potential impacts on public and core paths and note any mitigation in relation to impacts.	No further consultation required.

2.12 Climate Change, Carbon Balance and Sustainability

No comments have been received to date with regards to Climate Change Carbon Balance and Sustainability assessment matters.

2.13 Other Considerations (including aviation and telecommunication)

The following comments were received as part of the EIA Scoping Opinion on Other Considerations (including aviation and telecommunications).

Table 2-11: EIA Scoping Opinion – Other Considerations

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
Aviation and Radar			
Edinburgh Airport	The location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.	Noted.	No further consultation required.
Glasgow Airport	This proposal is located outwith the consultation zone for Glasgow Airport. As such we have no comment to make and need not be consulted further.	Noted.	No further consultation required.
Glasgow Prestwick Airport	The proposed development benefits from a substantial level of terrain shielding from the GPA Primary Surveillance Radar and is well clear of the GPA Instrument Landing System and all Instrument Flight Procedures and protected surfaces. Consequently, we would have no comment or valid objection to make regarding the proposal.	Noted.	No further consultation required.
Highlands and Islands Airports Limited	With reference to the above proposal, our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Campbeltown Airport. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted.	No further consultation required.
NATS	Potential impacts on En-route Radar for Lowther and Great	Noted.	The Applicant is currently in

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	Dun Fell. Unacceptable impacts on Prestwick Centre ATC and Military ATC. No impact anticipated on NATS Navigational aids or NATS radio communications infrastructure.		discussion with NATS regarding their scoping response.
Met Office	The proposed development is well beyond the 20 km radius consultation zone of any Met Office radar. Therefore we have no comments on the proposal and do not need to be consulted further.	Noted.	No further consultation required.
Defence Infrastructure Organisation / Ministry of Defence	<p>The MOD has concerns with this proposal due to the potential impact to low flying aircraft operating in the development area.</p> <p>The development falls within Tactical Training Area 20T (TTA 20T), an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.</p> <p>The MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.</p> <p>The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.</p> <p>The advice provided is in response to the information detailed in the developer's document "Lairdmannoch Scoping Report" dated August 2023.</p>	<p>A reduced aviation lighting scheme will be developed following the design freeze to minimise and mitigate the potential lighting effects.</p> <p>The Applicant assures that the MOD will be consulted for any change/amendment in the proposed design.</p>	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.		
Telecommunications			
Arqiva	With regards to the television and telecommunications links operated by Arqiva, we can confirm that we have no concern or objection to the locations of the turbines listed in Table 1 on P5/6 of the EIA Scoping Report. The nearest television RBL link is approximately 6km south of the development. However, we would request that Arqiva are reconsulted if there is a change in the location of the turbines, to our inbox windfarms@arqiva.com	Noted.	No further consultation required.
	Arqiva do not usually comment upon the specific impact of wind farm developments upon domestic television reception. However, although we would agree that the adverse effects of wind turbines on television reception are diminished since digital switchover, we do not consider the likelihood of significant effects to be minimal. If a wind turbine is close to the direct path between a transmitter and a digital television receive antenna, it is likely that a viewer will suffer significantly degraded television reception, with either no reception or highly annoying signal break up. This risk is increased with multiple wind turbines creating complex reflections if several turbines are close to the direct path. Given the location of this wind farm development, the	As per the EIA Scoping Report the potential for adverse effects on domestic television reception is greatly diminished post digital switchover, which completed across the UK in 2012 and therefore the likelihood of significant effects is minimal and therefore, excluded (scoped-out) from detailed assessment.	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<p>specific risk to households in this case is likely to be low, but would require a more detailed study in order to confirm. This is not a service Arqiva provide, but there are specialist organisations who will undertake such studies.</p> <p>In circumstances where wind farm developments cause degradation to domestic digital terrestrial television (DTT) reception, Arqiva believe it is incumbent on the developer to mitigate and restore viewer reception, regardless of whether a study has been undertaken or not.</p>		
Atkins Global	The above application has now been examined in relation to UHF Radio Scanning Telemetry communications used by our Client in that region and we are happy to inform you that we have NO OBJECTION to your proposal.	Noted.	No further consultation required.
BT	We have studied the proposed windfarm development 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.	Noted.	No further consultation required.
JRC	<p>This proposal is *cleared* with respect to radio link infrastructure operated by the local energy 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.</p> <p>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. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above).</p> <p>In making this judgement, JRC has used its best</p>	Noted.	No further consultation required.

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted. It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.		
MLL Telecom	There are no existing links within a 10km radius of your proposed development, so we therefore have no objection regarding the proposal.	Noted.	No further consultation required.
Vodafone	After plotting the co-ordinates for the nine proposed wind turbines I can confirm that we have no links in the area that will be impacted by the development.	Noted.	No further consultation required.
Virgin o2	We do not currently have microwave links in that area.	Noted.	No further consultation required.
Major Accidents and Disasters			
Coal Authority	I have checked the site location plan against the information held by the Coal Authority and can confirm that the proposed development site is located outside of the defined coalfield. On this basis, the Planning team at the Coal Authority have no comments to make.	Noted.	No further consultation required.
ONR Land Use Planning	With regard to planning application EC00004900, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted.	No further consultation required.
Forestry			

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
Woodland Trust	We would recommend that the applicants seek to undertake an Arboricultural Impact Assessment to ensure that any important trees (including any ancient or veteran trees) are identified and accounted for as part of the scheme ahead of the full planning application.	The Applicant will undertake the necessary arboricultural assessments as part of the EIA application.	No further consultation required.

2.14 Further Consultation

In addition to the scoping consultation, additional consultation was undertaken with key consultees regarding specific issues. All further consultation is summarised below.

Table 2-12: Further Consultation

Consultee	Comment	Applicant Response	Further EIA Consultation
Historic Environment Scotland	<p>A further pre-application consultation request was sent to HES on 18th December 2023. HES responded to this request on 12th February 2024. The pre-application request responded to comments set out in HES Scoping Response.</p> <p>Further assessment of the potential for significant setting effects upon assets located beyond 10km was undertaken and presented to HES as part of this further pre-application consultation. HES responded to this stating 'We are content that you have provided sufficient justification within your letter dated 18 December 2023 for assets within our remit beyond 10km to be scoped out from EIA assessment. We have no assets beyond 10km from the Proposed Development to propose for inclusion in the EIA report.'</p> <p>The consultation set out proposed visualisations based on HES's Scoping response. In their response HES noted that they were content that wireframe visualisations from the following assets would be sufficient for assessing the potential impacts upon setting:</p> <ul style="list-style-type: none"> • Bargatton Farm, cairn 610m S of (SM1002);Cairntosh Hill, cairn (SM2237); • Craig Hill, fort, Laurieston (SM2891); • Edgarton Mote, fort 690m SW of Camelon Bridge (SM1119); • Rusco Tower (LB3299); • Anworth Old Church Churchyard (LB3309); and • Cally (GDL00079). 	<p>Noted. The EIAR will provide justification for any further assets scoped out of detailed assessment.</p> <p>The agreed visualisations will be included in the EIAR and will inform the assessment of potential impacts.</p>	<p>Further consultation is planned with HES with regard to potential for impacts upon the setting of Loch Mannoch cairn and stone circle N end of (SM1033).</p>

Consultee	Comment	Applicant Response	Further EIA Consultation
	<p>HES further welcomed the inclusion of visualisations from Loch Mannoch cairn and stone circle N end of (SM1033) and indicated that photomontages should be provided from similar locations to the wirelines presented as CH1a-c in the consultation. In particular they noted that photomontages should be provided from:</p> <ul style="list-style-type: none"> • The centre of the stone circle at SM1033, looking towards the cairn at an angle of about 300 degrees; • From the centre of the cairn SM1033 looking toward the solar panels at an angle of about 120 degrees; and • From the dam on the east shore of Loch Mannoch looking towards the cairn and stone circle (SM1033) at an angle of about 325 degrees. 		
NatureScot (Ecology)	<p>Following a NatureScot consultation on Bats and Solar Farms Atmos emailed NatureScot on 28/08/24 asking whether this was likely to change. We received the following response on 03/09/24.</p> <p><i>I was passed on your query below as I am currently working on the updates to our pre-application guidance for solar farms which I hope to finalise this month. Please note there are no changes in our advice in relation to bats.</i></p> <p><i>In our current guidance it states that "our standing advice for bats should be referred to inform survey, assessment, mitigation and any licensing requirements. The risk of collision is low so bat activity surveys are <u>not</u> required."</i></p>	Noted	No further consultation
NatureScot (Landscape)	<p>A request was made for further meetings with Landscape specialist regarding the potential to design out adverse impacts on the Fleet Valley NSA. Clarification was received that there is no requirement to undertake an assessment of the proposed Galloway National Park.</p>	Noted	Further discussion with NatureScot will be undertaken.
NatureScot (Ornithology)	<p>Consultation was undertaken with Scottish Natural Heritage (now NatureScot) early in the project with respect to impacts on the qualifying features of the Laughenghie and Airlie Hills SSSI as part of early site assessment process. They referred us to RSPB for the exact information, relating to a sensitive receptor associated with the SSSI.</p>	The Applicant approached RSPB regarding the information being sought.	No further consultation

Consultee	Comment	Applicant Response	Further Consultation	EIA
RSPB	<p>Consultation was undertaken with RSPB early in the project (August 2019) with respect to impacts on the qualifying features of the Laughenghie and Airlie Hills SSSI as part of early site assessment process. RSPB forwarded our request to the Chair of the local Raptor Study Group who was able to provide the information we were seeking</p> <p>In July 2024, RSPB were re-consulted following receipt of their scoping response. In this the Applicant provided more information on the timing of scoping, copies of the previous consultation that RSPB had no record of, and requested further information on the cumulative assessment as we considered the scope of the assessment RSPB were requesting was too generic, and in some parts of their request, not achievable.</p> <p>They responded (July 2024) (sensitive information has been removed and replaced with a ...):</p> <p><i>Just to clarify – the email chain ... although directed to our Area Manager Andrew Bielinski via our Regional office, as your record of the email chain in 2019 confirms, this data is in the hands of the local raptor study group and not rspb directly. Therefore, we maintain our advice for a wider data search with rspb directly via the HQ data unit email address we provided and FLS who are data owners for Black Grouse data in this area. We also re confirm our advice for the need for a data search with Dr Larry Griffin regards Greenland white-fronted geese although I appreciate that you may have already pursued these data searches.</i></p>	<p>The information fed into early site assessment and informed survey design.</p> <p>Since further information was not provided regarding the cumulative assessment, the cumulative assessment will be carried out as per the method outlined in the scoping report.</p> <p>Noted on the consultation requirements.</p>	No further consultation	No further consultation

3 Public Consultation

Three in-person public exhibitions have been held locally to date, one in Laurieston, one in Twynholm and one in Ringford on the following dates:

- On 3rd September 2024, between 3pm and 7pm at the Balmaghie Public Hall, Laurieston, DG7 2PW;
- On 4th September 2024, between 3pm and 7pm at the Twynholm Village Hall, 3 Main Street, Twynholm, Kirkcudbright, DG6 4NT; and
- On 5th September 2024, between 3pm and 7pm at the Ringford Village Hall, Main Street, Ringford, Castle Douglas, DG7 2AL.

In addition, the Applicant has maintained a project website (<https://lairdmannochenergypark.co.uk/>) to provide updates ahead of the application submission.

The Applicant is also conducting a further round of in-person public exhibitions, one in Gatehouse of Fleet, one in Laurieston and one in Twynholm on the following dates:

- On 25th February 2025, between 3pm and 7pm at the Gatehouse of Fleet Parish Church Hall, Castramont Road, Gatehouse of Fleet, DG7 2JE.
- On 26th February 2025, from 3pm – 7pm at the Twynholm Village Hall, 3 Main Street, Twynholm, Kirkcudbright, DG6 4NT; and
- On 27th February 2025, from 3pm – 7pm at the Balmaghie Public Hall, Laurieston, DG7 2PW.

The Applicant is also currently engaged with the following Community Councils and has offered meetings with all community councils. So far, only one meeting has been requested with Tongland and Ringford Community Council and has been organised for the 10th March 2025.

- Balmaghie Community Council;
- Crossmichael and District Community Council;
- Kelton Community Council;
- Royal Burgh of Kirkcudbright and District Community Council;
- Borgue Community Council;
- Gatehouse of Fleet Community Council;
- Castle Douglas Community Council;
- Twynholm Community Council; and
- Tongland and Ringford Community Council.

3.1 PAC Report

Further details of pre-application engagement will be set out in the Pre-Application Consultation Report (PACR), which will accompany the application.

Feedback from the consultation events has been collected through questionnaires and will be collated into the PACR.

Public comments were taken into consideration ahead of confirming the final design of the Proposed Development, particularly comments around the final proposed transport

route to the Proposed Development which have been adopted as part of the final design.

4 Design Iterations

4.1 Design Consultation

During the pre application process in October 2020 the Proposed Development consisted of 12 wind turbines (no solar panels or BESS) at 180m tip height plus associated infrastructure.

Following receipt of the pre application response the design of the Proposed Development has evolved to feature 9 wind turbines (to include ground mounted solar and BESS) at 180m tip height plus associated infrastructure.

The reduction in wind turbine numbers from 12 to 9 is primarily as a result of market changes since the pre application consultation was undertaken in 2020. Wind turbine technology has evolved since this time and the wind turbines proposed as part of the Proposed Development now feature larger rotors requiring larger spacing, resulting in the current design of the Proposed Development.

The reduction in wind turbine numbers at this stage aimed to reduce the potential for the stacking of wind turbines from key viewpoints, reduce the overall footprint resulting in reduced impacts on potential habitats on site and improves the efficiency of the Proposed Development whilst maintaining the proposed installed capacity.

In August 2023, as part of the Scoping Report, the Applicant submitted an indicative turbine layout for the Proposed Development comprising of 9 turbines up to 180m tip height. Specific design comments in relation to Scoping are captured within the Table 4.1.

In general, the Scoping Opinion raised concerns regarding visibility of the Proposed Development with a focus on the design achieving an appropriate fit within nearby sensitive areas. Concerns were raised about the potential for impacts to the nearby national scenic areas and important archaeological areas.

As surveys and consultation progressed and understanding of the Proposed Development Site developed, further design workshops were held with the technical experts working on the EIA.

At the time of writing this Report, the final peat depth surveys are being conducted, the results of which, in combination with the other known constraints and feedback from consultation with Statutory and non-Statutory Consultees regarding the design chill layout, will inform the final design (design freeze) for the Proposed Development.

Table 4-1: EIA Scoping Opinion – Design Considerations

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
ECU	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, finalisation of viewpoints, cultural heritage,	The Applicant is actively engaging with key consultees, and their recommendations are being carefully considered and incorporated into the final design through an iterative design process. Details of this consultation-led	At the time of writing this report, consultation is ongoing with certain consultees. The EIAR will summarise the consultation that

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	cumulative assessments and request that they are kept informed of relevant discussions.	design approach will be provided in the Design and Access Statement in support of the planning application. The Applicant will actively continue to share updates with the ECU with regards to the consultation that takes place regarding the Proposed Development.	has taken place and the comments received with respect to each technical discipline.
D&GC Roads Planning Team Leader	It would be appropriate that any future application confirm the access route(s) and identify the full extent of proposed off-site road accommodation and mitigation works including passing place provision, carriageway strengthening, widening and alterations to road boundaries all along any proposed access route(s) necessary to permit construction traffic and the passage of component delivery vehicles (this may require land outwith the public road boundary and a separate planning consent may be required in respect of these works) and the potential impacts on utility services lying within the public road boundary.	An <i>Abnormal Load Assessment</i> will be undertaken as part of the application and a detailed review of any upgrades required will be undertaken following consent.	No further consultation required.
	All accommodation works must be designed and constructed to the satisfaction of the Planning Authority in consultation with the Roads Authority and will require appropriate permits and consents to have been issued.	Noted.	The Applicant will initiate engagement with D&GC Roads, Transport Scotland and Scotways regarding the required consents and permits.
	Where public road boundaries are to be altered either for the formation of temporary accesses or for accommodation works, these should be reinstated in their original position at the conclusion of construction works (unless prior agreements have been secured with the Planning and Road Authorities).	The post construction remediation will be undertaken as agreed with authorities.	No further consultation required.
NatureScot (Landscape)	'Aspects that we consider could be sensitive to a development of this scale at this location would	The applicant has sought to minimise the impacts on these aspects as much as	Further consultation was requested in

Consultee	Scoping Comment	Applicant Response	Further Consultation	EIA
	<p>be;</p> <ul style="list-style-type: none"> The enclosing eastern ridge becoming dominated or a reduction in its perceived scale by the large size of the turbines (noting that the turbines are proposed at 180m to tip, located upon landform that is 180 – 220m aod). Policy woodland / hedgerows, mature broadleaved woodlands, can act as scale indicators potentially accentuating the perception of the large size of the wind turbines. In this NSA they also provide a strong underlying landcover pattern providing smaller scale and more enclosed and intimate feeling in places, as well as making the landscape in the upper valley seem remote. Landscape scale and openness are particularly important characteristics in relation to wind turbines because large wind turbines can easily seem to dominate some landscapes. Detraction or a shift in focus from Gatehouse being the focal point in the valley as appreciated in views from the west. Adverse or poor scale relationship with respect to the location of the proposed Development close to the softer, enclosed and intimate upland part of the valley. The small size and extent of the NSA. Especially east to west, close to the development where it is only c.4km in width, the upland glen character could easily appear overwhelmed by turbines of the size proposed.' 	<p>possible through the iterative design process. These comments have been a key consideration in the design work to date.</p> <p>Further consultation was undertaken with NatureScot regarding the draft design in February 2024, along with a request for further discussion regarding mitigation but resources did not allow further engagement.</p>	February 2025	prior to design freeze.
D&GC	Reference is made to the Supplementary Guidance (SG) - Wind Energy Development: Development Management Considerations Part D and the Dumfries and Galloway Wind Farm Landscape Capacity Study (Appendix C of the SG)	Design advice contained within these studies has been included in the design development.	No further consultation required.	

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
Historic Environment Scotland	<p>There are a number of nationally important historic environment assets within our remit in the vicinity of the development whose settings have the potential to be adversely impacted by the proposals as they stand. In particular, at this stage we have concerns about Loch Mannoch, cairn and stone circle (SM1033). These are further discussed in the annex to this letter.</p> <p>Should the proposed development progress, we recommend that if impacts on the setting of monuments from turbines in the proposed scheme prove capable of mitigation, this should be taken into account and inform the iterative design process. The applicant may wish to explore design options which change the development layout, turbine heights and number of turbines in order to identify whether significant adverse impacts can be mitigated. We strongly recommend that further engagement with ourselves in undertaken as the development progresses</p>	<p>Loch Mannoch, cairn and stone circle (SM1033) has formed a key consideration in design work to date. This has included considering the height, number and location of turbines proposed and has considered the potential for impact upon the asset in views from it as well as considering the Proposed Development in views towards the asset with an aim of minimising potential impacts upon the asset's setting.</p>	<p>Further consultation with HES is planned in February 2025 with regard to the potential impacts upon the setting of Loch Mannoch cairn and stone circle (SM1033).</p>
SEPA	<p>Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.</p>	<p>Efforts have been made to utilise existing infrastructure as much as possible in the design freeze to minimise the extent of new works on previously undisturbed ground.</p> <p>The final design layout has been achieved through an iterative design process. The alternatives considered will be provided in the Design and Access Statement.</p>	<p>No further consultation required</p>
	<p>The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map</p>	<p>The Proposed Development has been designed to minimise watercourse crossings where possible and at least a 50m buffer has been maintained where possible between proposed infrastructure and water features.</p> <p>The Applicant will ensure that</p>	<p>No further consultation required</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<p>showing:</p> <ul style="list-style-type: none"> (a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. (b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. (c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. <p>If water abstractions or dewatering are proposed, a table of volumes and timing of groundwater abstractions and related mitigation measured must be provided.</p> <p>Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures.</p> <p>If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be provided in support of the submission.</p>	<p>all maps and figures provided as part of the EIAR and application will be of an adequate scale and detail.</p> <p>It is anticipated that water crossings will be designed to accommodate the 1 in 200-year flooding event and infrastructure will be located away from watercourses. Recommendations for water crossing types will be set out in the EIAR.</p> <p>Detailed designs of crossing will be developed as part of the CAR application process post-consent.</p> <p>The Applicant will be undertaking a Flood Risk Assessment as part of the EIAR.</p>	
	<p>The planning submission must:</p> <ul style="list-style-type: none"> (a) Demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ (b) Outline the preventative/mitigation measures to avoid 	<p>The design of the Proposed Development aims to minimise the impact on peat as much as possible.</p> <p>Avoidance of areas of deeper peat (>1m) has been a key consideration in the design process.</p> <p>The Scottish Government Carbon Calculator will be</p>	No further consultation required

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	<p>significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches or the storage and re-use of excavated peat.</p> <p>A detailed map of peat depths with all built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.</p>	<p>used to inform the carbon assessment.</p> <p>An Outline Peat Management Plan will also be prepared to set out mitigation measures for peat management.</p>	
	<p>A map must be provided demonstrated that all Groundwater Dependent Terrestrial Ecosystems (GWDTE) are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions.</p>	<p>The Applicant will ensure that all maps and figures provided as part of the EIAR and application will be of an adequate scale and detail.</p>	<p>No further consultation required</p>
	<p>A map must be provided demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions.</p>	<p>The Applicant will ensure that all maps and figures provided as part of the EIAR and application will be of an adequate scale and detail.</p>	<p>No further consultation required</p>
NATS	<p>Lowther RADAR and Great Dun Fell RADAR:</p> <p>It has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.</p>	<p>Noted.</p>	<p>The Applicant is currently in discussion with NATS regarding their scoping response.</p>
Defence Infrastructure Organisation (MOD)	<p>The development proposed includes wind turbine generators and/or meteorological mast(s) that exceed a height of 150m agl and are therefore subject to the lighting requirements set out</p>	<p>A reduced aviation lighting scheme will be developed following the design freeze to minimise and mitigate the potential lighting effects.</p>	<p>Further consultation will take place to address the concerns on low flying operation</p>

Consultee	Scoping Comment	Applicant Response	Further EIA Consultation
	in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.	The Applicant assures that the MOD will be consulted for any change/amendment in the proposed design.	and mitigation strategy.

4.2 Design Iterations

Since the submission of the EIA Scoping Report and following the receipt of the EIA Scoping Opinion; the Applicant has undertaken several design iterations to address the consultee comments and minimise the environmental impacts.

An overview of the main iterations is described in Table 4-2. These iterations have taken into consideration the existing tracks and on-site environmental and engineering constraints and the local landscape, including avoidance and/or appropriate buffering of watercourses, peat and sensitive habitats.

Table 4-2: Main Design Iterations to Date

IT Layout	Turbines	Tip Height (m)	Design Changes
1: Feasibility Layout / Pre Application Layout	12	180m	<p>Initial feasibility based on preliminary environmental and technical considerations including:</p> <ul style="list-style-type: none"> • Consideration of wind resource including optimisation of energy yield and consideration of surrounding forestry; • Initial review of landscape and visual baseline conditions and potential impacts upon residential amenity and key views (particularly the Fleet Valley Regional and National Scenic area), consideration of fitting the design within local topography; • Initial review and appraisal of the historic environment of the Site and surrounding area, including historical landscapes and cultural heritage assets (particularly the Loch Mannoch Cairn and Stone Circle and Loch Mannoch Archaeologically Sensitive Area; • Initial review of ornithological and ecological baseline conditions and potential impacts including nearby SPA's, SSSI and SAC's; • Initial review of hydrology, hydrogeology and soils through a desk-based assessment; • Initial review of various access options including abnormal loads access; • Consideration of site gradient; • Initial review telecoms links and offsets through a desk-based assessment; and <p>Initial review of other baseline conditions for disciplines including noise and aviation.</p>
2: Scoping Layout (also	9	180m	Following advancements in market technology and policy support of mixed-use (hybrid) technologies in order

IT Layout	Turbines	Tip Height (m)	Design Changes
includes ground mounted solar and BESS)			<p>to maximise the potential energy output of the site, ground mounted solar and battery storage have been added to the project increasing the potential MW capacity to over 100MW. The number of wind turbines was also reduced from 12 to 9 to respond to market changes in wind turbine technology since pre application process allowing less turbines with larger rotors.</p> <p><u>Landscape and Visual</u></p> <p>The number of turbines was reduced from 12 to 9 in order to reduce the potential for the stacking of wind turbines from key viewpoints especially from key receptors with the Fleet Valley NSA following concerns raised during the pre-application stage from the D&GC landscape officer and NatureScot on potential impacts on the Fleet Valley NSA. Appropriate buffers from surround residential properties were maintained.</p> <p><u>Cultural Heritage</u></p> <p>During the heritage walkover, previously recorded non-designated heritage assets, such as field systems and farmsteads, were identified and matched records in the National Record of the Historic Environment. The scoping layout was designed to avoid direct impacts to these assets as much as possible (including the Loch Mannoch Archaeologically Sensitive Area). ZTV analysis was undertaken to determine potential impacts on two scheduled monuments within 1km of the Proposed Development (Loch Mannoch scheduled cairn and stone circle and Edgarton Mote fort) with the positioning of the turbines taking into consideration these sensitive receptors.</p> <p><u>Ecology</u></p> <p>National Vegetation Classification surveys identified priority peatlands on site including NVC habitats M15, M15b, M25 and M25a. The scoping layout has evolved to prioritise avoidance of these habitats (alongside other constraints) where possible. The scoping layout also considered other ecological constraints including maintaining appropriate buffers from potential bat roost, red squirrel dreys and neighbouring woodland.</p> <p><u>Hydrology, Hydrogeology, Peat and Soils</u></p> <p>The following changes were made to the Proposed Development as a result of the findings of the phase 1 peat probing:</p> <ul style="list-style-type: none"> • The access track up to T2 was adjusted to avoid deep peat; and • Areas of peat greater than 0.5m are avoided where possible, or where this was not possible with other environmental constraints, infrastructure was moved to as shallow peat as possible. <p>The scoping layout took into consideration watercourse buffers where other constraints allowed.</p> <p><u>Transport & Access</u></p> <p>Access to the Proposed Development included two options either directly from the east (take the A762 and</p>

IT Layout	Turbines	Tip Height (m)	Design Changes
			access site directly from the east) or directly from the north (continue along the B795 to the existing forestry tracks).
3; Design Chill	9	180m	<ul style="list-style-type: none"> • T8 was moved west to avoid deeper peat and priority peatland habitat (M15/M25); • T9 was also moved west in order to avoid steeper gradients on site; • T6 was moved northeast to remove it from appropriate woodland buffers and to avoid deeper peat and priority peatland habitat (M15/M25); • T1 was moved east to avoid deeper peat and priority peatland habitat (M15/M25); • T5 was moved northeast to avoid watercourse and woodland buffers; <p>Access tracks and associated infrastructure were updated to account for the new turbine locations avoid locations with peat greater than 0.5m deep (where possible).</p>
4; Design Freeze Layout	9	180m	<p>Following community consultation, the Applicant has discounted the previously considered access from the North to address the local communities concerns in relation to access.</p> <p>The Proposed Development now features two site access options: directly from the east as previously proposed (A762) and a new option from the south west following the B727 before turning onto an existing forestry track.</p> <p>The final design has seen further minor micro-siting of T9, T6, T5 and T4 in response to further consideration in relation to peat and non-designated cultural heritage assets.</p> <p>As the Proposed Development site access now considered an access point from the south west, the internal access tracks have been redesigned to allow for sufficient access of components to site. The final internal access design also takes into consideration engineering constraints and minimisation of required excavation works.</p>

4.3 Design Freeze Summary

The Applicant intends to apply to the Scottish Ministers for Consent under Section 36 of the Electricity Act (Scotland) 1989 (as amended) to develop an energy park comprising of a maximum of nine three-bladed horizontal axis wind turbines (up to 180m in tip height), ground mounted solar, battery storage and associated infrastructure.

The estimated capacity of the Proposed Development is anticipated to be 100MW (comprising 60MW wind, 20MW solar and 20MW battery storage).

The associated infrastructure includes:

- Access tracks;
- Borrow Pits;
- Construction of turbine foundation and crane hardstanding;

- Construction of a substation compound;
- Construction of a temporary construction compound;
- Underground cabling; and
- Watercourse crossings (to be finalised and minimised where possible).

The latest layout of the Proposed Development is shown on Figure 2.

5 Landscape Viewpoints

Following the issue of the Scoping Opinion by the ECU and consultation with NatureScot has been undertaken as documented in the above tables, to finalise the viewpoints and types of visualisations to be used in the assessment of the Proposed Development.

Table 14 below details the viewpoint locations and visualisation types to be used in the LVIA assessments and EIAR chapters. Where coordinates are italicised, this reflects where photography has been collected from a number of locations, the location with the greatest visibility will be assessed in the relevant chapters.

Table 5-1: Landscape Viewpoints

Viewpoint	Location	Coordinate	Source	Day/Night	Visualisation
VP1	A762, Lairdmannoch Bridge	267816, 561560	Scoping report	Day	Photomontage
VP2	A762, Kirkconnell	267742, 560716	Scoping report	Day	Photomontage
VP3	Neilson's Monument	268731, 560676	Scoping report	Day	Photomontage
VP4	Loch Mannoch, core path	266272, 559749	Scoping report	Day	Photomontage
VP5	Glengap	265067, 559700	Scoping report	Day and Night	Photomontage
VP6	West of Loch Whinyeon	261884, 560873	D&G consultation	Day	Photomontage
VP7	Minor road between Gatehouse and Laurieston, near Darngarroch Bridge	262207, 563072	Scoping report	Day	Photomontage
VP8	Laurieston, A762	268134, 564574	Scoping report	Day and Night	Photomontage
VP9	A75 SW of Castle Douglas	270145, 558373	D&G consultation	Day	Photomontage
VP10	Underwood	268550, 555109	Scoping report	Day	Photomontage
VP11	A75 west of Twynholm	265059, 554123	D&G consultation	Day	Photomontage
VP12	Millenium (Rutherford's) Monument	258684, 555924	NatureScot consultation	Day	Photomontage
VP13	B796 near Upper Rusko	256435, 561650	Scoping report	Day and Night	Photomontage
VP14	Airie Hill	262146, 568578	D&G consultation	Day	Photomontage
VP15	Parton viewing	268741, 570840	Scoping	Day	Photomontage

Viewpoint	Location	Coordinate	Source	Day/Night	Visualisation
	point		report		
VP16	Crossmichael	272811, 567004	Scoping report	Day	Photomontage
VP17	Threave Castle	274088, 562217	Scoping report	Day	Photomontage
VP18	Castle Douglas	276091, 561945	Scoping report	Day	Photomontage
VP19	Screel Hill	277994, 555489	Scoping report	Day	Photomontage
VP20	Kirkcudbright	267933, 551067	Scoping report	Day	Photomontage
VP21	Mossyard Bay	255148, 551785	Scoping report	Day	Photomontage
VP22	Mill Knock	255433, 554970	NatureScot consultation	Day	Photomontage
VP23	Cairnharrow	253337, 556103	Scoping report	Day	Photomontage
VP24	Cairnsmore of Fleet	250333, 567058	Scoping report	Day	Photomontage

6 Submission Timescales

In accordance with the advice from the ECU on next steps from receipt of the Scoping Opinion, this section provides a timeline for the submission of the application with anticipated dates for adverts, consultees list, and proposed locations of the EIAR for public viewing.

The Applicant intends to lodge the Section 36 application in Spring 2025.

The Applicant will make the EIAR available at a public location, to be agreed with the ECU and Dumfries & Galloway Council.

The EIAR will also be made freely available online through the ECU and D&GC planning portals.

In accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (Section 14), the application for Section 36 Consent will be advertised in the Edinburgh Gazette for two consecutive weeks, a national newspaper for one week, and at least one local newspaper for two weeks. It is proposed this is the Scotsman, the Dumfries and Galloway Standard and the Galloway News.

The dates for the advert publication are yet to be determined and will be agreed with ECU.

Once the application is submission, it is proposed that the list of consultees in Table 1 is consulted, and it anticipated that the ECU will electronically issue the consultees copies of the EIAR and supporting documents.

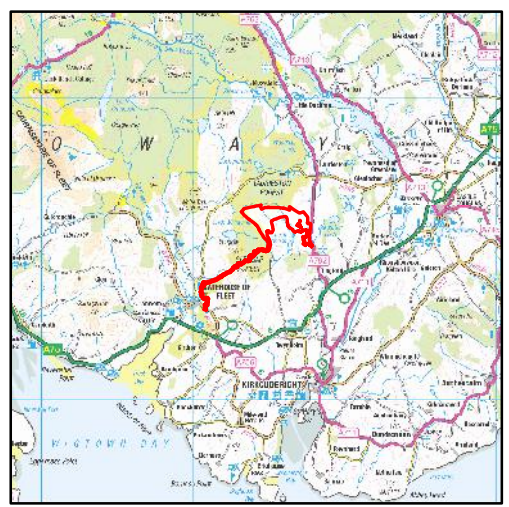
Figures

Lairdmannoch
Energy Park



Figure 1
Site Location Plan

Key
[Red outline] Site boundary

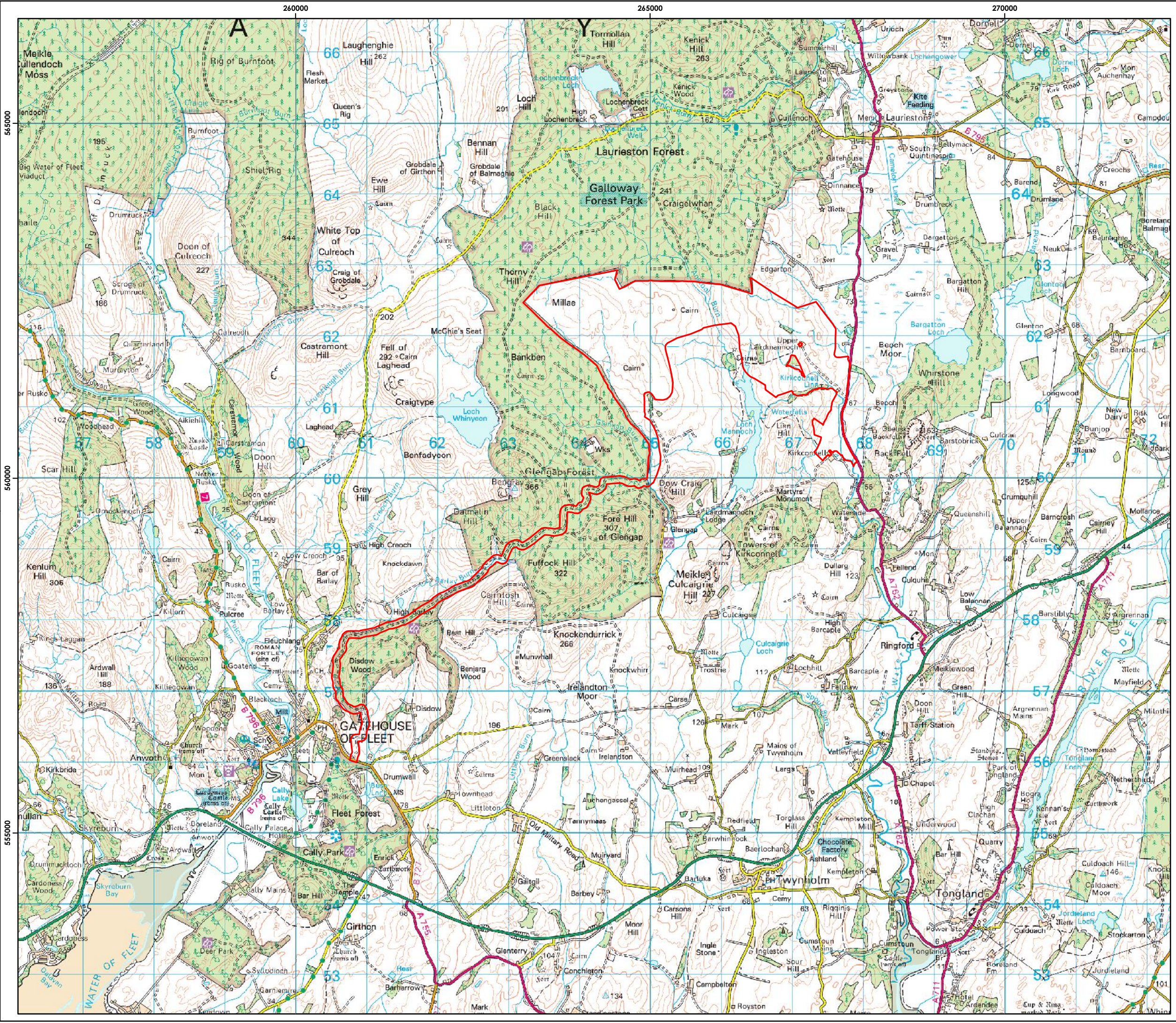


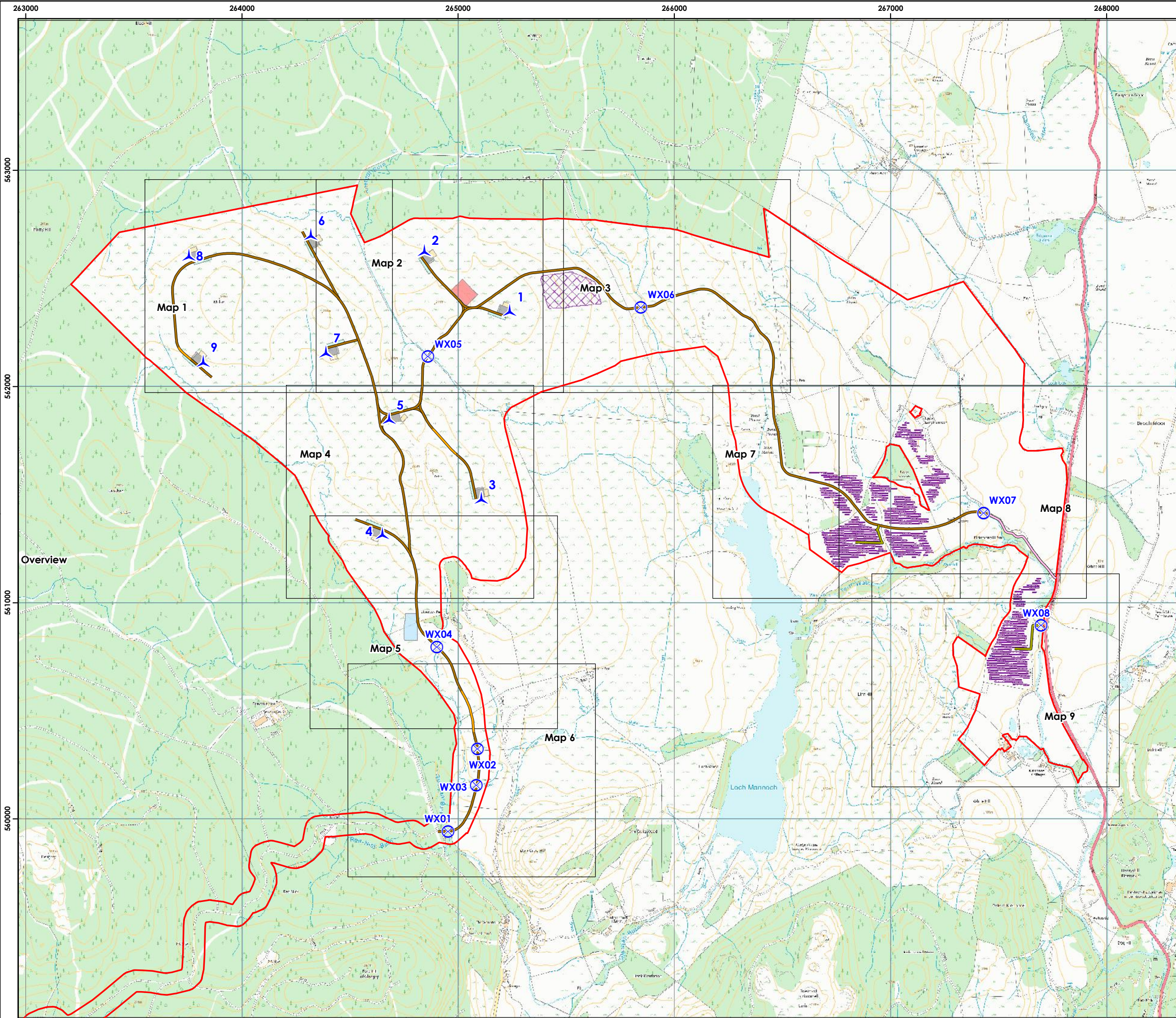
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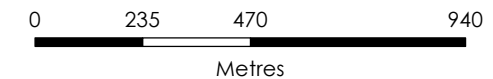
Lairdmannoch Energy Park



Figure 2
Proposed Development Layout

Key

- Site boundary
- Turbine Location
- Wind infrastructure
 - Turbine foundation
 - Crane hardstanding
 - Auxillary crane area
 - Tower storage
 - Blade storage
 - Substation and BESS
 - Construction compound
 - Borrow Pit
- Track lines
 - Access track - cut
 - Access track - floating
 - Access track - upgraded / widened
 - Access track - solar
 - Watercourse crossing
- Solar infrastructure
 - Solar panel
 - Power Station
 - Switching and Breaking Station



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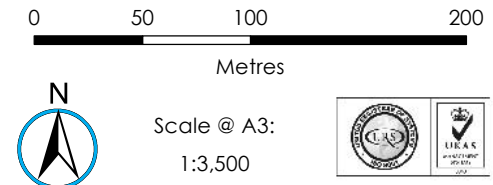
Lairdmannoch
Energy Park

wind2

Figure 2
Proposed Development Layout

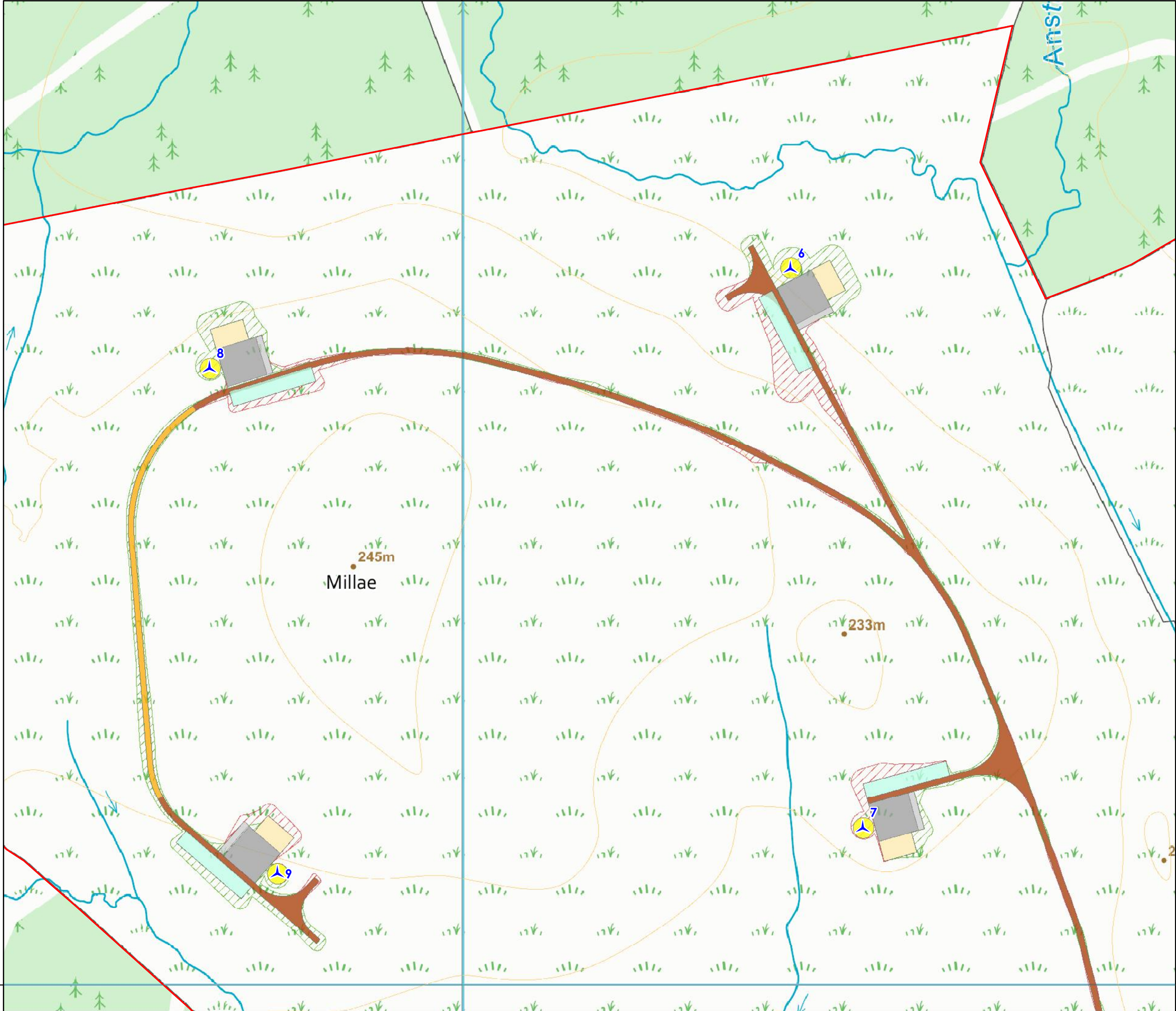
- Key
- Site boundary
 - Turbine Location
- Wind infrastructure
- Turbine foundation
 - Crane hardstanding
 - Auxillary crane area
 - Tower storage
 - Blade storage
 - Earthworks - fill
 - Earthworks - cut
- Access tracks
- Access track - cut
 - Access track - floating

atmos
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Lairdmannoch
Energy Park

wind2

Figure 2
Proposed Development Layout

- Key
- Site boundary
 - Turbine Location
 - Wind infrastructure
 - Turbine foundation
 - Crane hardstanding
 - Auxillary crane area
 - Tower storage
 - Blade storage
 - Substation and BESS
 - Borrow Pit
 - Earthworks - fill
 - Earthworks - cut
 - Access tracks
 - Access track - cut
 - Watercourse crossing

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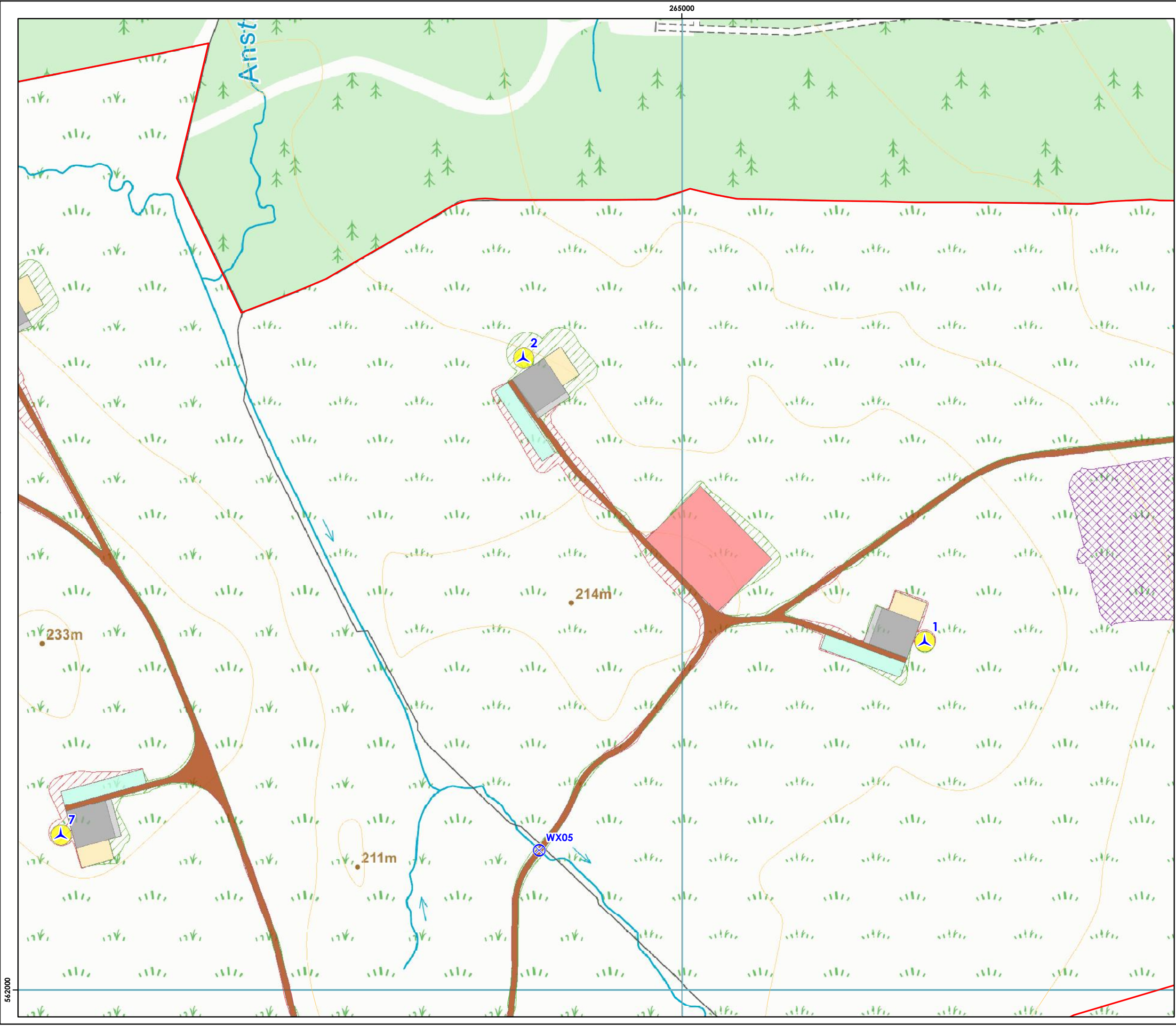


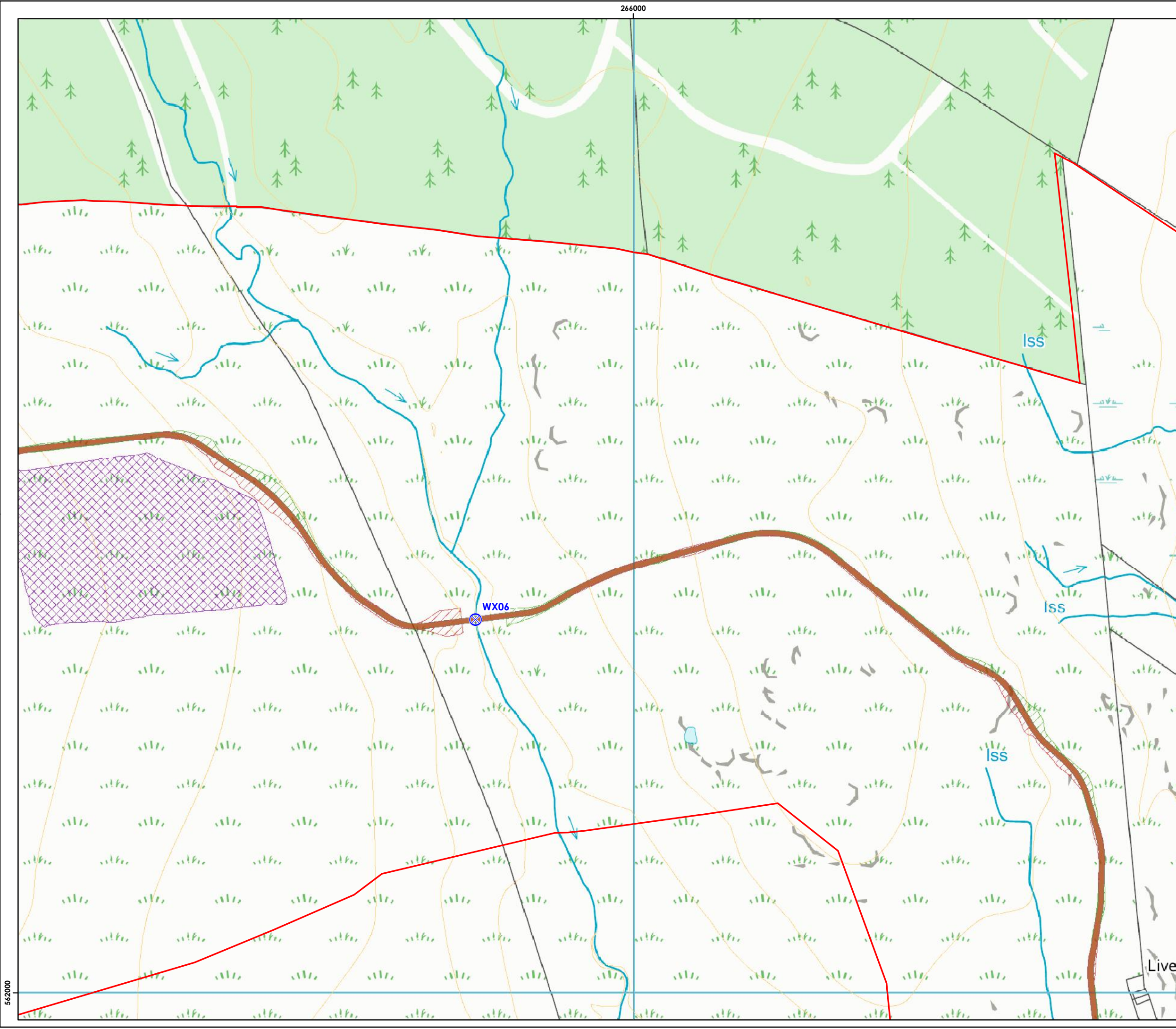
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Lairdmannoch Energy Park

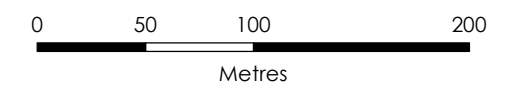
wind2

Figure 2
Proposed Development Layout

Key

- Site boundary
- Wind infrastructure**
 - Borrow Pit
 - Earthworks - fill
 - Earthworks - cut
- Access tracks**
 - Access track - cut
 - Watercourse crossing

atmos
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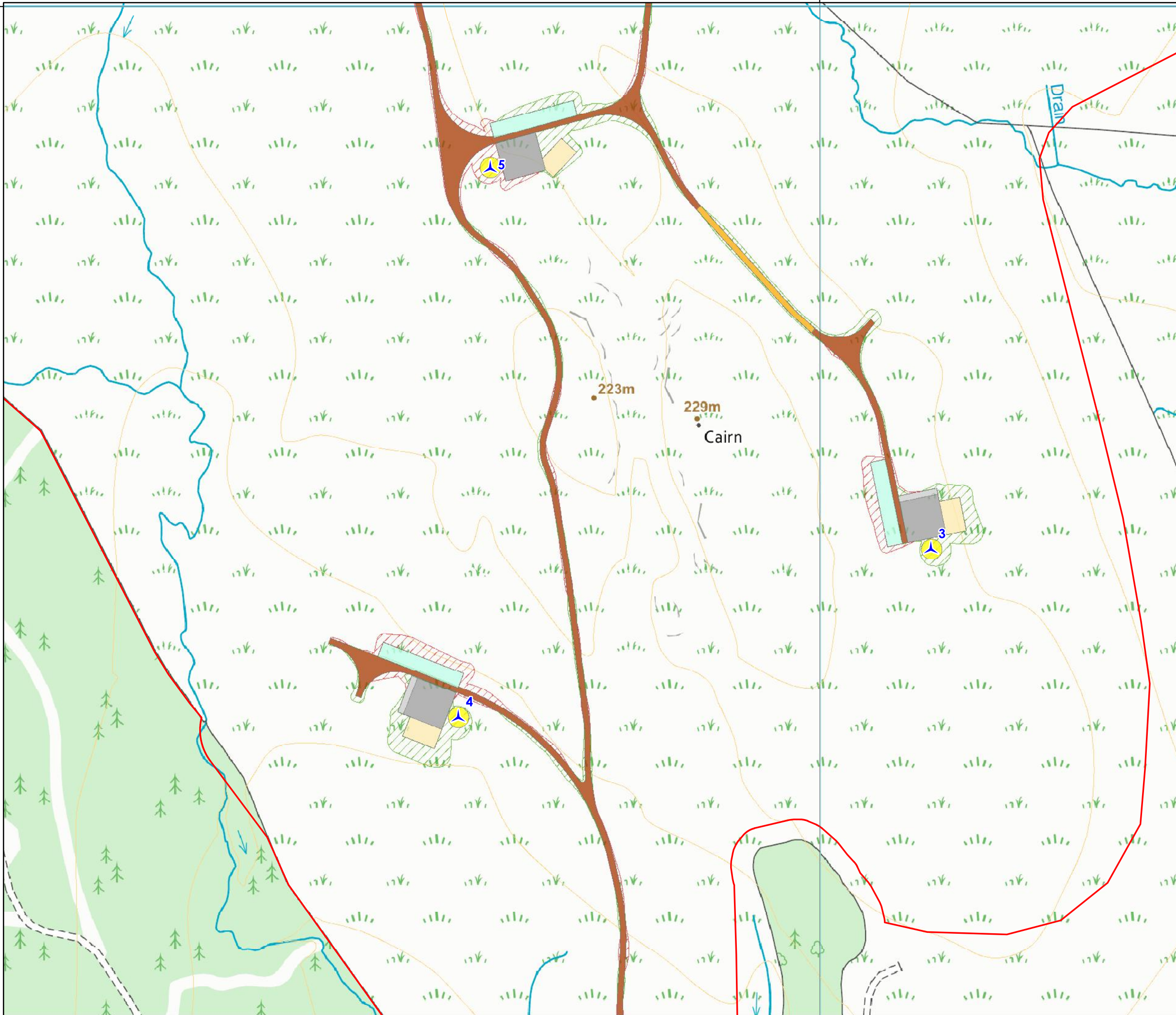


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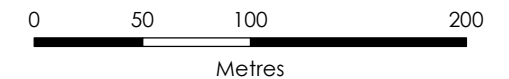


Lairdmannoch Energy Park

wind2

Figure 2
Proposed Development Layout

- Key**
- Site boundary
 - Turbine Location
- Wind infrastructure**
- Turbine foundation
 - Crane hardstanding
 - Auxillary crane area
 - Tower storage
 - Blade storage
 - Earthworks - fill
 - Earthworks - cut
- Access tracks**
- Access track - cut
 - Access track - floating



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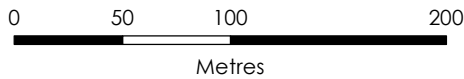
Lairdmannoch
Energy Park

wind2

Figure 2
Proposed Development Layout

- Key
- Site boundary
 - Turbine Location
 - Wind infrastructure
 - Turbine foundation
 - Crane hardstanding
 - Auxillary crane area
 - Tower storage
 - Blade storage
 - Construction compound
 - Earthworks - fill
 - Earthworks - cut
 - Access tracks
 - Access track - cut
 - Access track - floating
 - Watercourse crossing

atmos
CONSULTING

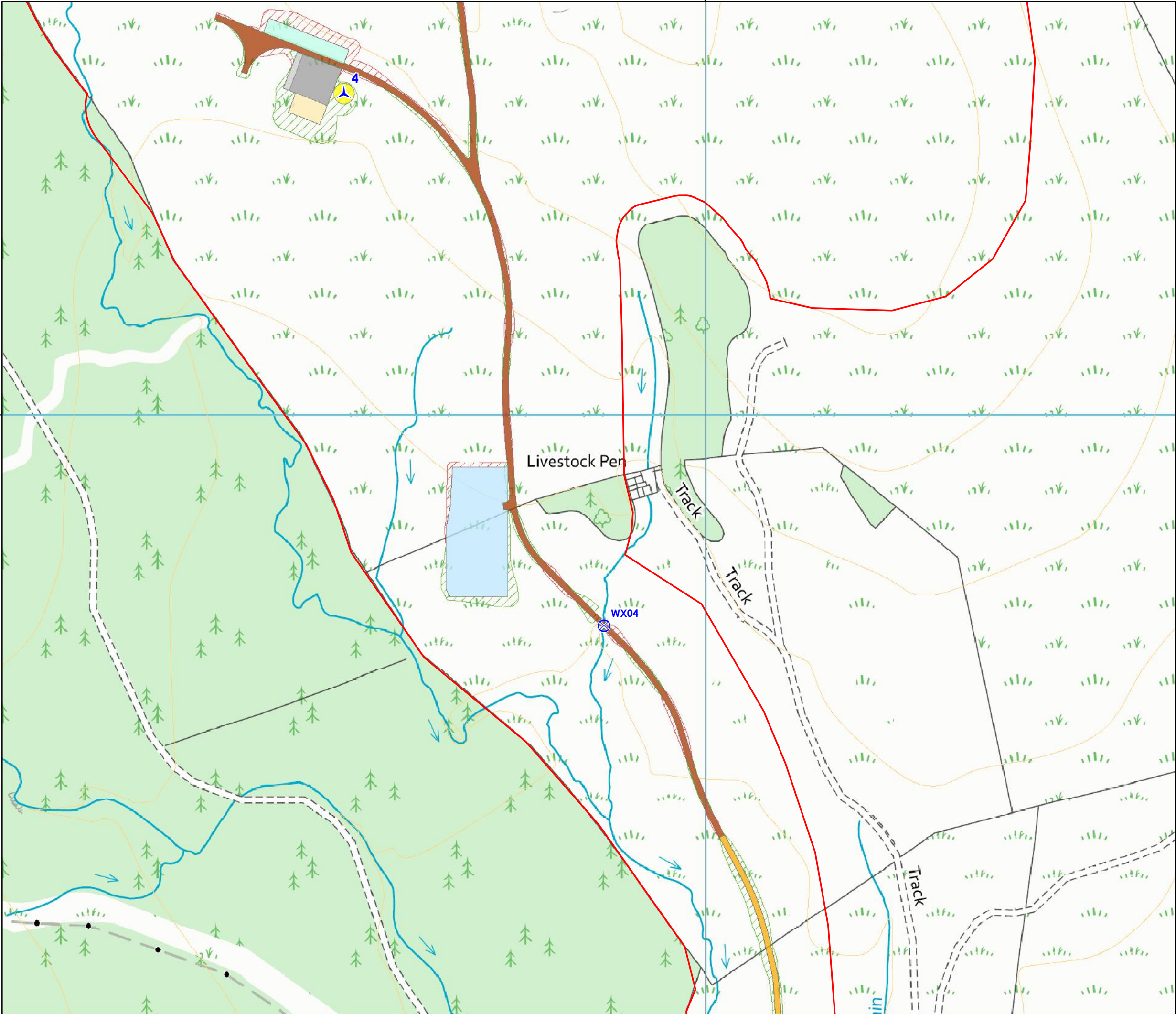


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Lairdmannoch Energy Park

wind2

Figure 2
Proposed Development Layout

Key

- Site boundary
- Earthworks - fill
- Earthworks - cut
- Access tracks
 - Access track - cut
 - Access track - floating
- Watercourse crossing

atmos
CONSULTING

0 50 100 200
Metres

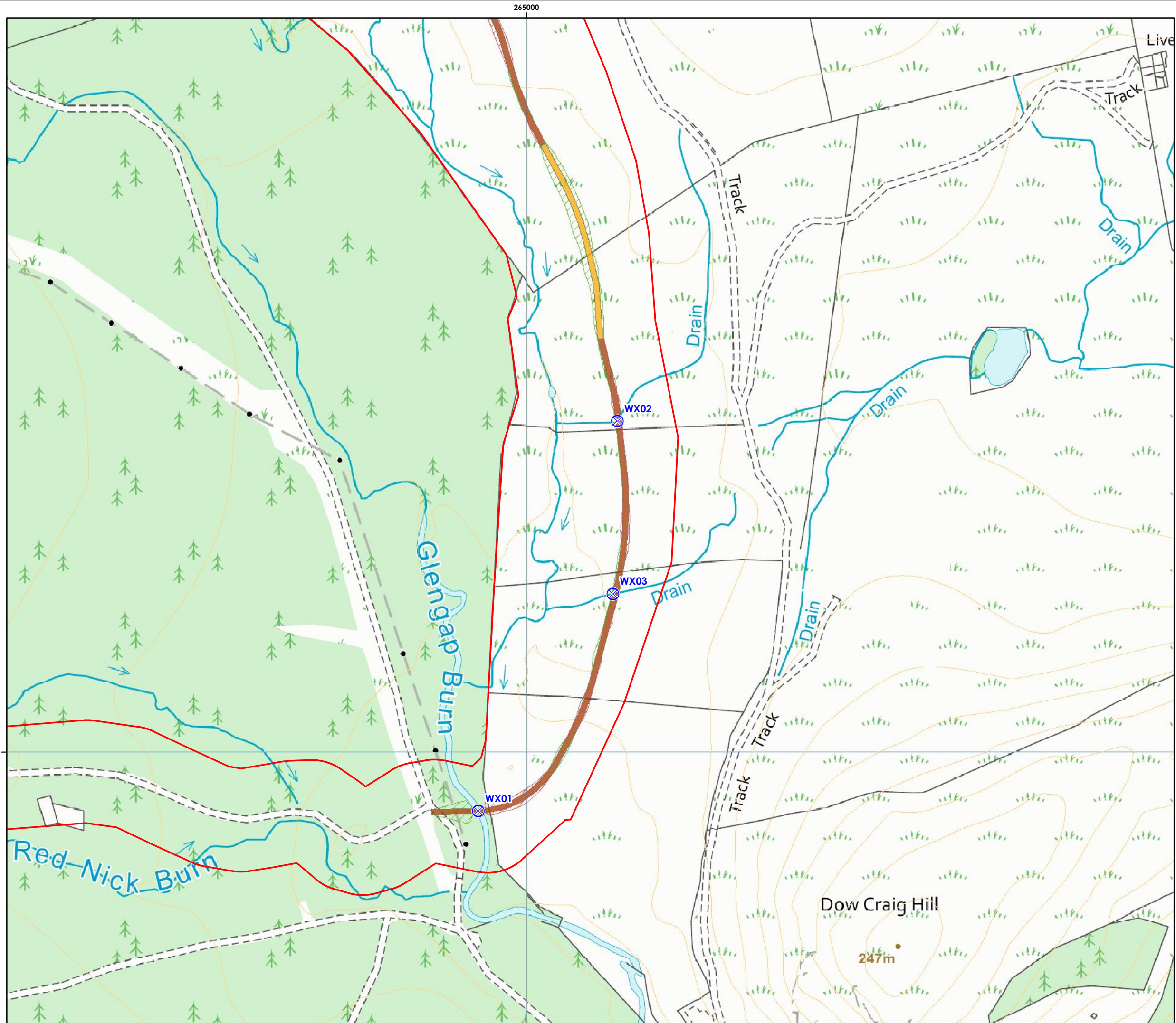


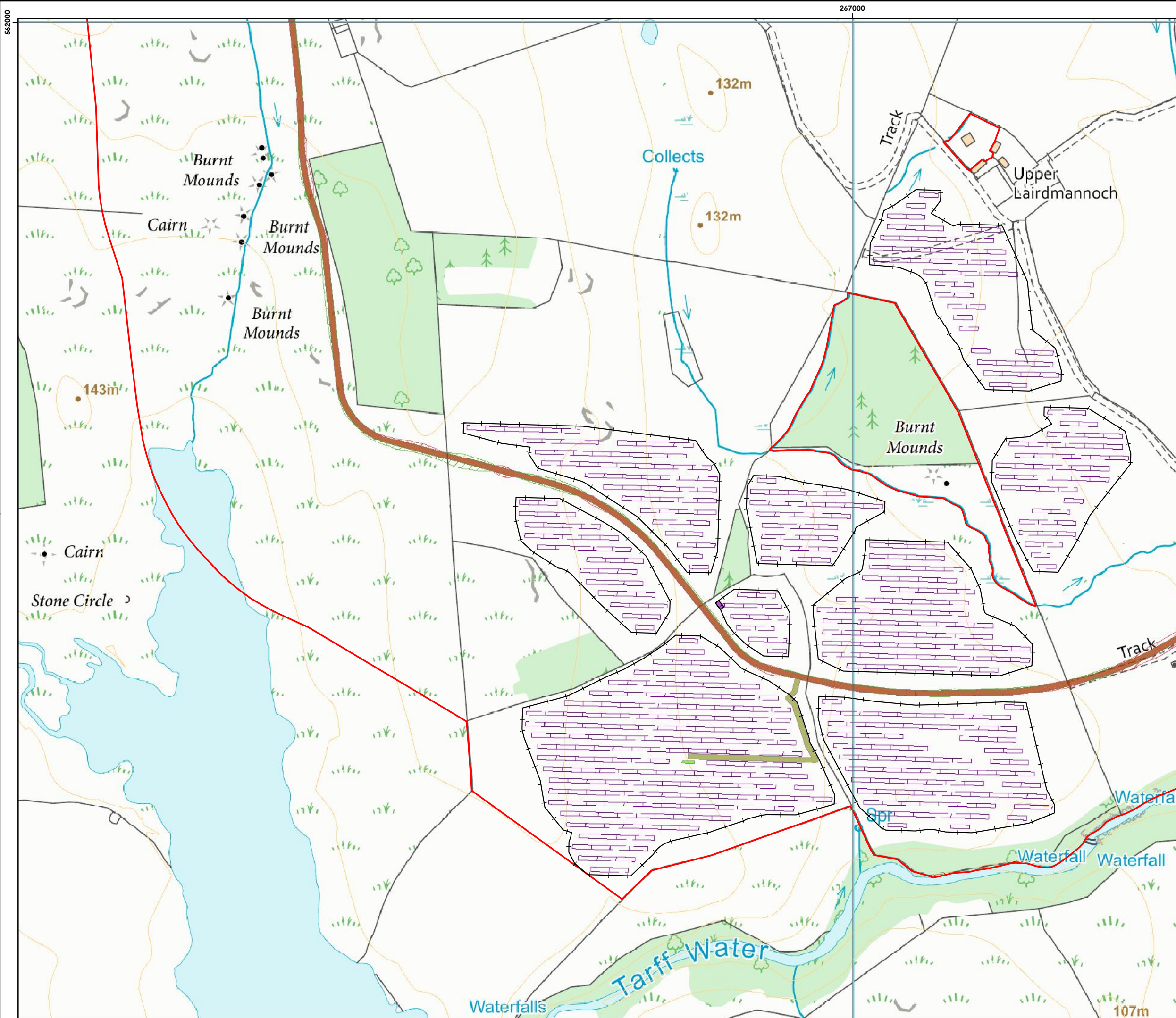
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Lairdmannoch Energy Park



Figure 2
Proposed Development Layout

- Key**
- Site boundary
 - Earthworks - fill
 - Earthworks - cut
 - Access tracks**
 - Access track - cut
 - Access track - solar
 - Solar infrastructure**
 - Solar panel
 - Power Station
 - Switching and Breaking Station
 - Security fence



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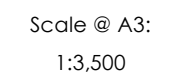
wind2

Key

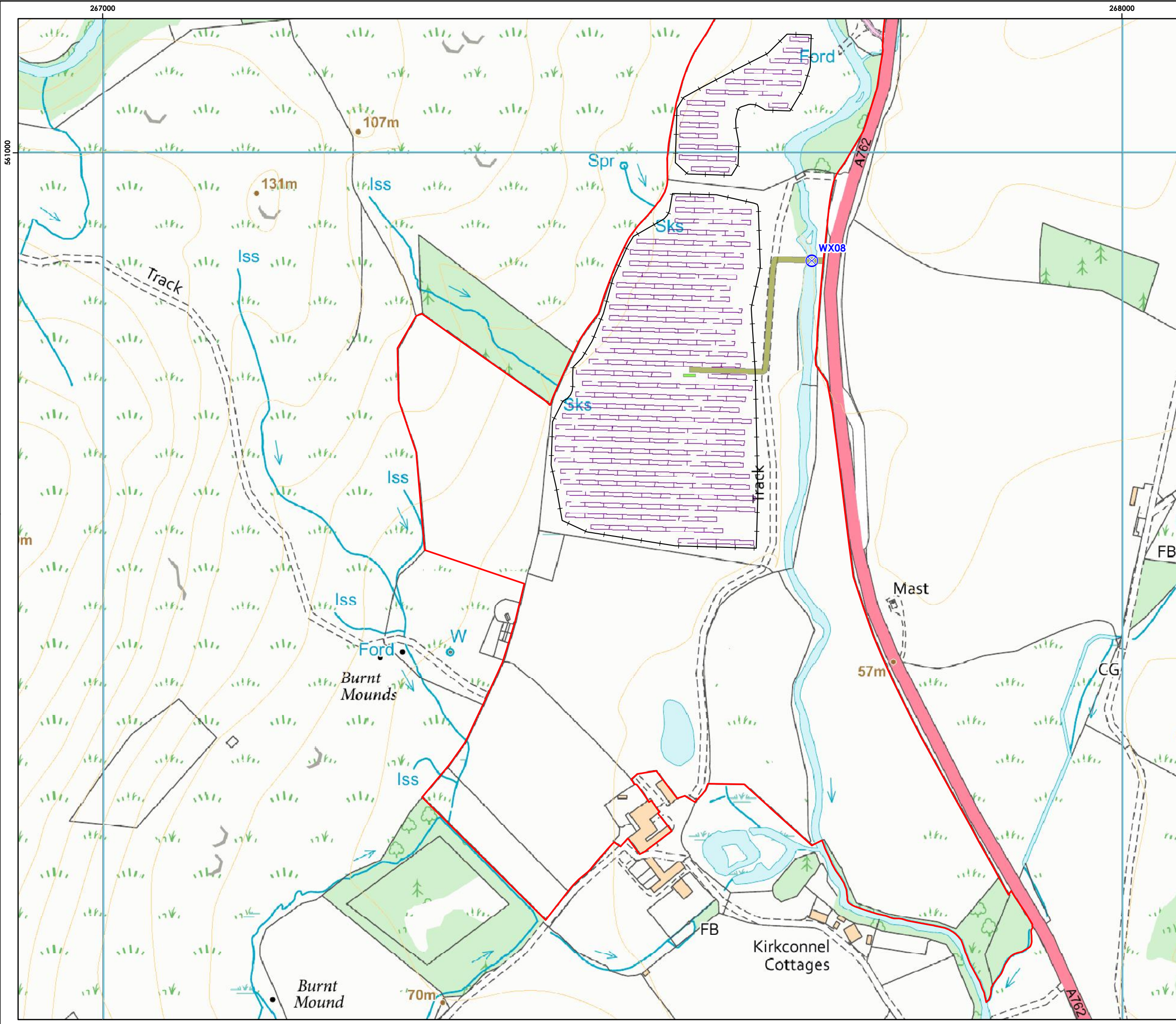
- ## Solar infrastructure

 Solar panel
 Power Station
 Switching and Breaking Station
 Security fence

0 50 100 200
Metres



27/02/2025	TL010	40418/SL/079c
Drawn by: TH	Checked by: TH	Approved by: JG



Lairdmannoch Energy Park

wind2

Figure 2
Proposed Development Layout

- Key**
- Site boundary
 - Access tracks**
 - Access track - upgraded / widened
 - Access track - solar
 - Watercourse crossing
 - Solar infrastructure**
 - Solar panel
 - Power Station
 - Security fence



050100200

Metres

N

Scale @ A3:
1:3,500

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