

Lairdmannoch Energy Park

Technical Appendix 8-4: Private Water Supply Risk Assessment

Lairdmannoch Energy Park Limited wind2

May 2025



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Glossary of Terms

Term	Definition
The Applicant	Lairdmannoch Energy Park Limited
The Agent	Atmos Consulting Limited
Environmental Advisors and Planning Consultants	Atmos Consulting Limited
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development
Environmental Impact Assessment Regulations	The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	Lairdmannoch Energy Park
The Proposed Development Site	The full application boundary as per Figure 1-1
Study Area	The Proposed Development Site plus a 500m buffer

List of Abbreviations

Abbreviation	Description
CEMP	Construction Environment Management Plan
CIWEM	Chartered Institution of Water and Environmental Management
CSM	Conceptual Site Model
DGC	Dumfries and Galloway Council
DTM	Digital Terrain Model
ECoW	Ecological Clerk of Works
EnvCoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
NGR	National Grid Reference
PWS	Private Water Supplies
SEPA	Scottish Environment Protection Agency
SLR	SLR Consulting Ltd



1 Introduction

SLR Consulting Ltd (SLR) was commissioned by Lairdmannoch Energy Park Limited to undertake a private water supply (PWS) risk assessment for the proposed Lairdmannoch Energy Park (the Proposed Development).

This Technical Appendix considers the potential effects of the Proposed Development on the quality and quantity of water at PWS sources within a Study Area which comprises a buffer of 500 m from the Proposed Development Site. To complete the assessment a conceptual site model is presented which uses a source-pathwayreceptor linkage to assess the risk to each PWS. Where necessary mitigation, required to safeguard a water source, is proposed.

The location of the PWS sources is shown on Figure 8-4-1 appended.

This Technical Appendix should be read in conjunction with **Chapter 8: Hydrology**, **Geology and Hydrogeology** of the EIA Report which contains a detailed description of the local hydrology and hydrogeology, flow mechanisms and hydraulic properties of the soils and geology, the embedded mitigation incorporated in the development design, and an assessment of impacts on groundwater and surface water flows and quality.

1.1 Survey Approach

Following consultation with Dumfries and Galloway Council (DGC) data was received for PWS sources within the study area. This data was then augmented with Ordnance Survey mapping and aerial photography.

Additional properties, and potential water users, were also identified following a programme of site-specific field investigation that involved visiting the properties within the study area, enquiring about their water use and source, and mapping water abstraction locations. A standard reporting questionnaire was used to ensure consistency of data collected.

The location of water sources (boreholes, springs, surface abstractions) and holding tanks etc. were recorded using a handheld GPS. When residents were unavailable on the day that the survey was conducted, questionnaires were left at properties requesting details of their water source or PWS.

The field investigation was completed in November 2024 and March 2025 by the author of this report and the assessment has been reviewed by Brian Dunlop.

Brian is a Technical Director with SLR and is responsible for undertaking and managing hydrological and hydrogeological assessments. He has over 30 years' experience in engineering and environmental consultancy and has acted as water lead on projects in the renewables, infrastructure, built environment and mining sectors both in the UK and internationally. Brian is based in SLR's London office and has provided expert evidence in legal proceedings requiring specialist knowledge of engineering hydrology and stormwater management. He is a Chartered Engineer (C.Eng) and a Member of the Chartered Institute of Water and Environmental Management (CIWEM).



1.2 Assessment Methodology and Report Structure

As required by Scottish Environment Protection Agency (SEPA)'s guidance the assessment has been undertaken by suitably qualified and experienced specialists.

The assessment has been undertaken with reference to SEPA guidance which sets out SEPA's expectations for the assessment of impact of developments on groundwater abstractions, used for both public and private water supplies. This guidance applies to all proposed infrastructure, both temporary and permanent and provided any temporary or permanent dewatering abstractions are unlikely to exceed 10 m³/day.

SEPA recommends adopting a phased approach to the assessment of risks to groundwater abstractions, with greater detail being required for higher risk sites or activities, and identify the steps given in **Table 8-4-1**.

Step	Description
1	Identifying any Existing Groundwater Abstractions
	This covers both public and private water supply groundwater abstractions, both within and out with the site boundary. It is critical that it is the actual source of the abstraction, and not the property that it supplies, that is identified.
	The relevant buffer zones for groundwater abstractions for all proposed infrastructure, both temporary and permanent and provided expected dewatering rates do not exceed 10m ³ /day, are:
	a) 10m for all activities
	b) 100m radius of all subsurface activities less than 1m in depth;
	c) 250m of all subsurface activities deeper than 1m
	Details of each private water supply source will require confirmation, including a site walkover survey. If there are no groundwater abstractions within the buffer zones, SEPA will not provide comment on this topic in our planning response.
	If there are no groundwater abstractions within the buffer zones there is no need to assess further and progress to Step 2.
2	Qualitative Impact Assessment
	A conceptual site model (CSM) should be provided as part of the Environmental Statement. This should include interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling.
	Qualitative assessment of the potential impacts to any groundwater abstractions identified within the relevant buffer zones is required. This should consider the expected extent, magnitude, likelihood, and duration, frequency, and reversibility of any potential impacts.
	The impact assessment should consider the impacts to each groundwater abstraction individually, including any potential cumulative effects if the groundwater abstraction is near multiple parts of the proposed development.
	If the potential impacts to groundwater abstractions are considered low or less then no further risk assessment (e.g. Step 3) is required.

Table 8-4-1: SEPA Methodology – Assessment Steps



Step	Description
3	Detailed Quantitative Risk Assessment
	This would include characterisation of the ground conditions at both the relevant infrastructure location(s) and the groundwater abstraction(s), plus the pathway(s) in between if appropriate. This will require ground investigation, including groundwater level and quality monitoring and quantify the potential change(s) in groundwater levels or flow regime.

Using this approach and extending this to include surface water abstractions and to consider the distribution pipework from ground and surface water abstractions results in the risk assessment criteria given in **Table 8-4-2**.

Table 8-4-2: Private Water Supply Risk Assessment Criteria

PWS Risk	Criteria
PWS source considered potentially at risk from the	• PWS source is located within 10m of any element of the Proposed Development;
Proposed Development	 spring fed or groundwater source is located within 100m of excavations less than 1m deep (such as access tracks);
	 spring fed or groundwater source is located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas); and / or
	 stream or surface water fed abstraction is located within the same surface water catchment and downstream of the Proposed Development.
PWS source is not considered at risk from the	• PWS source is located at least 10m away from any element of the Proposed Development;
Proposed Development, but distribution pipework may	 spring fed or groundwater source is not located within 100m of excavations less than 1m deep (such as access tracks);
be impacted	 spring fed or groundwater source is not located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas);
	 stream abstraction is not located within the same surface water catchment and / or upstream of the Proposed Development;
	 the distribution pipework between the PWS source and property may be crossed by the Proposed Development.
PWS source or pipework not considered to be at risk from	• PWS source is located at least 10m away from any element of the Proposed Development;
the Proposed Development	 spring fed or groundwater source is not located within 100m of excavations less than 1m deep (such as access tracks);
	 spring fed or groundwater source is not located within 250m of excavations greater than 1m deep (such as borrow pits, turbine crane pads and other hardstanding areas);
	 stream abstraction is not located within the same surface water catchment and / or upstream of the Proposed Development;
	• the distribution pipework between the PWS source and property will not be crossed by the Proposed Development.



The results of the PWS survey and assessment are presented in **Section 2** of this report in accordance with Step 1 of the SEPA guidance. For any PWS considered to be at risk from the Proposed Development, a qualitive risk assessment has been completed and is presented within **Section 3** of this report (Step 2 of the SEPA guidance).

Section 4 of this report gives detail of a potential water monitoring schedule and parameter list that could be used to monitor water quality at receptors that have a hydraulic linkage (e.g. flow pathway) to the Proposed Development. The monitoring frequency, parameter list and reporting programme would be subject to agreement with DGC, Scottish Water and SEPA should consent be granted, and it is anticipated would be secured by an appropriately worded pre-commencement planning condition.



2 Private Water Supply Risk Assessment (Step 1)

Table 8-4-3 presents information collected from the PWS field survey, returned questionnaires, data collected during the desk study following consultation with DGC. If a source is assessed to be within the buffers specified in SEPA's guidance and to have a hydraulic connection (e.g. there is a flow pathway) to the Proposed Development, a further qualitative risk assessment has been undertaken and necessary mitigation are given in **Section 3**.

The findings of Table 8-4-3 are summarised as follows:

- one PWS source is considered to be at risk from the Proposed Development;
- the distribution pipework to one PWS is considered to be at risk from the Proposed Development;
- two PWS sources are not at risk from the Proposed Development; and
- five properties are confirmed or thought to be supplied by mains.

Table 8-4-3: Private Water Supply Risk Assessment

PWS ID (Figure 8-4-1)	Property Name	Data Source and Source Type	Location of PWS Source and Distance from the Proposed Development	Details	PWS Risk Assessment (see Table 8-4-2)
PWS01	Beoch Old Farmhouse Beoch Backfell	Survey Spring	E 268515 / N 560702 Approximately 830 m east of the proposed access point off A762.	Properties have been confirmed to be supplied by a spring fed source which is located from Brastobrick Hill. Water is gravity fed to the farmhouse initially and then downhill to the other two properties. The exact location of the PWS source was not found during the survey, however, no development is proposed within 250m or upstream of the PWS source or on the Brastobrick Hill. The distribution pipework is also not considered to be at risk from the Proposed Development.	PWS source and pipework not considered to be at risk. No further assessment, monitoring or mitigation required.
PWS02	High Barlay Farm	Unknown	E 261266 / N 558113 (property location) Approximately 200 m north of the proposed southwestern access	The residents were unavailable during the survey and no questionnaire has been returned at the time of reporting. If the property is supplied by a PWS source it is likely this will be sourced north (upgradient) of the property.	PWS source and pipework not considered to be at risk, however the PWS source will need to be confirmed prior to construction.



PWS ID (Figure 8-4-1)	Property Name	Data Source and Source Type	Location of PWS Source and Distance from the Proposed Development	Details	PWS Risk Assessment (see Table 8-4-2)
			track.	No development is proposed within 250m or upstream of the property with the exception of minor improvements of the proposed southwestern access track. Further the Barlay Burn is located between the southwestern access track and the property so there is unlikely to be any hydraulic connectivity between the Proposed Development and any groundwater source PWS. The PWS source, if present, and associated distribution pipework is not considered to be at risk from the Proposed Development.	No further assessment, monitoring or mitigation required.
PWS03	Hillhead Cottage	Survey Spring (unconfirmed)	E 260936 / N 556986 Approximately 215 m north of the southwestern access track.	The property is confirmed to be supplied by a spring fed source which is thought to be located in the woods approximately 330 m north of the property, although the exact location of the supply was not found during the survey. No development is proposed within 250m or upstream of the PWS source, however, the distribution pipework will be crossed by the southwestern access track of the Proposed Development.	PWS source is not considered at risk but distribution pipework may be impacted. Further mitigation required – see Section 3. Subject to adoption of good practice measures, no further assessment on PWS03 is required.
PWS04	Girthon Old Manse	Survey Spring (unconfirmed)	E 260975 / N 556421 Approximately 40 m south of the southwestern access track.	The property is confirmed to be supplied by a spring fed source which is located in the woods approximately 350 m north of the property. The spring is located near a tributary of the Bush Burn and is located on the opposing side of the stream to the proposed southwestern access track. The PWS source is located within 100m of the proposed access track and therefore within the screening buffers given in SEPA guidance. Further assessment is required.	PWS source is potentially at risk. Further assessment is required (Step 2) – see Section 3.
M1	1 Kirkconnel Cottage	Survey Mains (unconfirmed)	N/A	The residents were unavailable during the survey and no questionnaire has been returned at the time of reporting. Neighbours confirm that the property is	No further assessment, monitoring or mitigation required.



PWS ID (Figure 8-4-1)	Property Name	Data Source and Source Type	Location of PWS Source and Distance from the Proposed Development	Details	PWS Risk Assessment (see Table 8-4-2)
				thought to be supplied by mains.	
M2	2 Kirkconnel Cottage	Survey Mains	N/A	Property confirmed to be supplied by mains	No further assessment, monitoring or mitigation required.
M3	Kirkconnel Farm	Survey Mains	N/A	Property confirmed to be supplied by mains	No further assessment, monitoring or mitigation required.
M4	Meadowpark	Survey Mains	N/A	Property confirmed to be supplied by mains	No further assessment, monitoring or mitigation required.
M5	Unknown	Survey Mains (unconfirmed)	N/A	The residents were unavailable during the survey and no questionnaire has been returned at the time of reporting. Neighbours confirm that the property is thought to be supplied by mains.	No further assessment, monitoring or mitigation required.
M6	Multiple properties	Survey Mains	N/A	Properties within the study area in this location confirmed to be supplied by mains	No further assessment, monitoring or mitigation required.



3 Qualitative Impact Assessment (Step 2)

This Section of the report provides assessment of PWS04 (Girthon Old Manse) which has been identified as potentially at risk from the Proposed Development.

3.1 Committed Mitigation

Chapter 8 of the EIA Report details the mitigation measures that would be deployed and used to safeguard the water environment and abstractions. Of relevance to this report and assessment are the following:

- the production of a final Construction and Environmental Management Plan (CEMP) which would be agreed with statutory consultees prior to commencement of any works;
- the deployment of an Ecological or Environmental Clerk of Works (ECoW or EnvCoW) to oversee all works and with the authority to cease works should a risk to the water environment (e.g. change in water flow or quality) become apparent;
- a commitment to undertake preconstruction (baseline), construction and post construction water quality monitoring and reporting; and
- commitment to protect distribution pipework in accordance with good practice.

As discussed in **Chapter 8** of the EIA Report. As part of the detailed design stage of the project, the location of the pipework at these locations will be confirmed and necessary protection implemented to ensure that the integrity of the infrastructure is maintained.

Where water distribution pipework is crossed by the Proposed Development this will be marked, and structural analysis competed. A site investigation will be undertaken to review confirm the location of the pipework, review the condition of the pipework and provide any additional mitigation measures that would be required to safeguard the pipework. If required, additional protection to pipework will be placed for the duration of works / traffic movement as required.

If damaged, the distribution pipework would be repaired, and reinstated, to its previous condition at the time of construction, as a minimum.



3.2 Assessment of PWS04 - Girthon Old Manse

Table 8-4-4: PWS04 - Girthon Old Manse: Summary Details

Descriptors	Details
Date Visited	March 2025
Source Type	Spring
Location	E 260975 / N 556421 Approximately 40 m south of the southwestern access track which will be upgraded as part of the Proposed Development. It is noted that the exact location of the spring was inaccessible during the survey due to dense forestry.
Photograph of Source	

Ground elevations locally fall to the southwest. The upstream catchment (which can often be a reliable proxy to the groundwater catchment area in this site setting) has been delineated using 1 m contours extracted from the 0.5 m Digital Terrain Model (DTM) obtained from the Scottish Remote Sensing Portal and is shown on **Plate 8-4-1**.

Published geology plans show that the source is located on / within deposits of glacial till underlain by sedimentary rocks of the Kirkmaiden Formation, both of which are common regionally. Sand and gravel in the till can yield groundwater but typically yields are low and unreliable given the variation in thickness and extent of the sand and gravel. The upper weathered surface of the bedrock can sustain small groundwater abstractions. Again, in both deposits groundwater flow is likely to follow local surface gradients (e.g. be approximated by the surface water catchment).

The water catchment (Plate 1) is shown to be limited and to extend to the northeast of the PWS source. It is confirmed no development is proposed within the catchment.

Further, a small tributary of the Bush Burn watercourse is shown to flow southward between the PWS source and the proposed southwestern access track, which is likely to form a "hydraulic barrier" between the two which means that there is unlikely to be any hydraulic connectivity between the access track and the spring.





Plate 8-4-1: PWS04 - Girthon Old Manse: Water Catchment Area

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The proposed upgrade works to the southwestern access track will not, therefore, affect the water supply that sustains the spring. The distribution pipework between the PWS source and the property is also unlikely to be crossed by the proposed access track.



Table 8-4-5 presents a qualitative risk assessment of PWS04, as required by SEPA's guidance. No significant risk is identified to the PWS source and therefore there is no requirement to progress to Stage 3 of SEPA's guidance, i.e. a quantitative risk assessment.



Descriptors	Details
Risk to Water Quality	Shallow groundwater flow is likely to occur which is vulnerable to pollution, however, no development is proposed within upstream catchment of the PWS source.
Risk to Water Quantity	PWS source likely abstracts water from shallow sand and gravel within the glacial till deposits or from shallow weathered bedrock.
	No works are proposed upstream of the PWS source and therefore the water supply which sustains the PWS source will not be affected by the Proposed Development.
	No permanent dewatering is required and no long-term effect on water levels or flow direction is expected.
	The distribution pipework from the source to the property will not be crossed by the proposed access track.
Recommendation	Confirmatory baseline, construction and post construction water level/flow and quality monitoring at the private water supply source should be undertaken.
	The distribution pipework from the source to the property will need to be clearly marked and protected as it passes beneath the access track.
Additional Mitigation	None over and above that specified in Chapter 8 of the EIA Report.
Overall Risk Assessment	The controls which would be adopted during construction and operation of the Proposed Development, which are in accordance with best practice and will be agreed in the final CEMP, will safeguard surface water and groundwater which sustains the PWS source. The likelihood and magnitude of impact on the PWS source is therefore assessed as negligible, and the resultant significance of effect is assessed as negligible and not significant .

Table 8-4-5: PWS04 - Girthon Old Manse: Qualitative Risk Assessment



4 Example Monitoring and Contingency Plan

Monitoring of the surface water catchments that drain from the site and PWS05 source (as identified in **Section 3**) has been recommended to confirm that the embedded mitigation included in the site design and committed to in the EIA Report are effective and that there is no impairment of the water environment and water sources.

Pre-development monitoring data can be used to establish baseline water levels and quality and establish trigger values which routine monitoring data collected during construction can be compared against.

A separate water monitoring and reporting plan would be developed during the detailed project design phase. The monitoring programme would be secured by a predevelopment planning condition to be agreed with statutory consultees. It is expected that the water monitoring plan would contain the following:

- in accordance with SEPA guidance, baseline monitoring would be undertaken monthly for a period of at least 12 months, fortnightly monitoring would be undertaken at PWS04 with monthly monitoring at other locations, and post construction monitoring would be carried out at a frequency of not less than monthly;
- location of proposed monitoring locations (National Grid Reference (NGR) and plan);
- proposals for baseline, construction and post construction monitoring and reporting;
- commitment to prepare and adhere to a pollution incident response plan;
- a commitment to maintain wholesome water supplies at all private water supply sources.

Table 8-4-6 shows an example protocol which could be used as a basis to agree a water monitoring protocol with relevant consultees, including Scottish Water.

Location	Frequency	Determinand Suite
PWS04	Monthly for 12 months prior	Field Sampling
• Surface water catchments that drain the Proposed Development Site, including the Tarff Water (in consultation with Scottish Water)	to, during construction and 12 months post construction.	• pH
		 Electrical conductivity
		Dissolved Oxygen
		• Redox
		Temperature
		 Water Level and/or flow
		Extractive Samples
		Chloride
		Alkalinity
		• Sulphate
		• Sodium
		• Potassium
		• Calcium
		Magnesium
		Ammoniacal Nitrogen
		• Nitrate
		Nitrite

Table 8-4-6: Example Monitoring Protocol



Location	Frequency	Determinand Suite
		 Orthophosphate
		 Biological Oxygen Demand
		 Chemical Oxygen Demand
		 Iron (total and dissolved)
		 Manganese (total and dissolved)
		 Total suspended solids
		 Dissolved organic carbon
		• Colour
		• Turbidity
		• Taste
		• Order
		 Other parameters relevant to the activities being undertaken or the hydrogeological setting e.g. hydrocarbons, metals, etc.

Monitoring locations, suite and frequency to be agreed with statutory consultees

4.1 Monitoring and Reporting Personnel

The monitoring and reporting would be undertaken by appropriately experienced and trained staff.

4.2 Monitoring Methodology

Water samples would be collected following guidance within SEPA, July 2003, Guidance on Monitoring of Landfill Leachate, Groundwater and Surface Water, v2 (specifically Section 9 thereof).

Prevailing weather conditions, qualitative flow conditions as well as other visual indicators would be recorded in order to aid the sample reporting.

The water samples would be placed directly into appropriate sterile bottles, which would be labelled and dispatched to a UKAS accredited laboratory under chilled conditions and accompanied by the relevant chain of custody documentation.



4.3 Example Intervention Strategy

In the unlikely event that the routine monitoring data recorded potential pollution at a private water supply an investigation would be undertaken and intervention strategy would be implemented. The details of this would be agreed prior to any construction and secured by an appropriately worded pre-commencement planning condition.

4.3.1 Alerting Potentially Affected Properties

Contact details (telephone numbers / email addresses) for private water supply users would be maintained by site management at all times.

In the event that monitoring data collected at any private water supply is above the baseline monitoring record and above prescribed regulatory standards then property owners would be advised and repeat water sampling undertaken (if agreed with the property owners). Property owners would be advised and repeat water sampling would be undertaken as soon as reasonably practicable.

Details of any affected property would be reported to DGC within the timeframe as agreed with DGC when the monitoring programme was agreed and finalised.

4.4 Provision of Alternative Water Supplies

The Applicant commits to maintaining the yield and wholesomeness of water supplies.

The following measures may be deployed in the unlikely event a private water supply is impaired by the works:

- provision of bottled potable water in the event of a short or transient derogation of a water supply (bottled water would be retained on site ready for quick dispatch to any affected property); and
- provision of an alternative water source (e.g. spring, borehole, alternative surface water abstraction location) in the event of a permanent derogation of a water supply.

In the event of an alternative water source being implemented DGC would be advised as soon as is practical.



5 References

SEPA (2024) Guidance on Assessing the Impacts of Development on Groundwater Abstractions.

SEPA (2003) Guidance on Monitoring of Landfill Leachate, Groundwater and Surface Water, v2.

Scottish Government, Scottish Remote Sensing Portal, available online at https://remotesensingdata.gov.scot/ [Accessed March 2025]



Lairdmannoch **Energy Park**

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Figure 8.4.1a Private Water Supply (PWS) Locations

Key Site Boundary Turbine Location Wind Infrastructure Turbine foundation Crane Hardstanding Auxillary Crane Area Tower Storage Blade Storage Substation and Battery Energy Storage System (BESS) Construction Compound Borrow Pit Track Lines Onsite Access Track - Cut Onsite Access Track - Upgraded / Widened Onsite Access Track - Floating Onsite Access Track - Solar Solar Infrastructure Solar Panel Power Station Switching and Breaking Station Local Hydrology SEPA Nested Waterbody Catchment Waterbody (OS OpenMap Local) Watercourse (OS OpenMap Local) Watercourse and Waterbody 50 m Buffer Private Water Supply (PWS) Type 🔺 Mains A Mains (unconfirmed) Property with PWS Property with PWS (unconfirmed) ▲ Spring Spring (unconfirmed) 岩SLR atmos CONSULTI 0 0.25 0.5 Kilometress

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