

Moffat W E. "Blood lead determinants of a population living in a former lead mining area in Southern Scotland." Published in Environmental Geochemistry and Health 1989 11(1): 3-9

Scottish Environmental Protection Agency "Scoping Study on metal contamination in the Glengonnar Water. National Health Public Health Response. Relating to Human Health Risk Assessment of the implications of metal contamination of water sources around Leadhills and Wanlockhead." Published 11 July 2012 by Health Protection Scotland, NHS Dumfries and Galloway and NHS Lanarkshire.

Ice Throw and Ice Fall.

The Community Council notes the comments relating to measures which minimise the risk of ice throw from turbine blades. It is also noted that ice fall from turbines is likely to occur. We can confirm that this is an issue with existing telecommunication and air traffic control structures in the Lowther Hills where hikers have to be aware of this hazard. It has been observed by hikers and fell runners that considerable sized blocks of ice can form and detach themselves.

Air Quality.

We would regard air quality as relevant to human health since construction works could lead to heavy metal particles being mobilised into the atmosphere. As such, this topic should not be scoped out.

Climate Change.

Given that a carbon balance assessment of the proposed development will be included in the EIA it is accepted that this topic can be scoped out.

Forestry.

We also agree that this topic can be scoped out.

Eskdalemuir Seismic Array.

We do not feel competent to comment on this topic.

Telecommunications.

Although this is a technical matter, the residents of Leadhills will expect that there will be no deterioration in the quality of television reception within the area and that any technical measures to ensure this is the case will be included within the EIA process.

Shadow Flicker.

It is noted that shadow flicker is identified in the report as affecting 17 dwellings within ten rotor blade diameters distance of proposed turbine locations and within 130 degrees either side of north of particular turbines. Shadow flicker can cause significant disturbance to those affected. The Community Council would expect that these properties should be identified within the EIA process and appropriate mitigation measures identified, including the resiting or deletion of offending turbines if satisfactory mitigation measures cannot be identified. The Community Council would further expect that, if the proposed development comes to fruition and unacceptable levels of turbine flicker occur, then the shutdown of offending turbines should be conditioned in any consent given. For these reasons we consider that this topic should not be scoped out of the EIA assessment.

5. Authorisation.

This document was prepared for consideration by Leadhills Community Council at an Extraordinary Meeting on 10 July 2025 at which the Community Council endorsed this document as its official response to the EIA Scoping Request.

From: [NATS Safeguarding](#)
To: [Econsents Admin](#)
Subject: RE: Request for Scoping Opinion Ravengill Energy Park [SG39557]
Date: 27 June 2025 14:33:48
Attachments: [image002.png](#)
[image003.png](#)

Our Ref: SG39557

Dear Sir/ Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.

Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority ("CAA") of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS's comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully

NATS

NATS Safeguarding

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NATS Internal

From: [NATS Safeguarding](#)
To: [Econsents Admin](#)
Subject: FW: Request for Scoping Opinion Ravengill Energy Park [SG39557]
Date: 27 June 2025 14:51:54
Attachments: [image002.png](#)

[SG39557 Ravengill Energy Park Wind Farm - TOPA Issue 1.pdf](#)

Our Ref: SG39557

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG39557.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

NATS

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Prepared by:
NATS Safeguarding Office



Technical and Operational Assessment (TOPA)

For Ravengill Energy Park
Wind Farm Development

NATS ref: SG39557

Scottish Government ref: ECU00006172

Issue 1

Contents

1.	Background	4
1.1.	En-route Consultation	4
2.	Scope	4
3.	Application Details	5
4.	Assessments Required	6
4.1.	En-route RADAR Technical Assessment	6
4.1.1.	Predicted Impact on Lowther RADAR	6
4.1.2.	Predicted Impact on Cumbernauld RADAR	6
4.1.3.	En-route operational assessment of RADAR impact	6
4.2.	En-route Navigational Aid Assessment	7
4.2.1.	Predicted Impact on Navigation Aids	7
4.3.	En-route Radio Communication Assessment	7
4.3.1.	Predicted Impact on the Radio Communications Infrastructure	7
5.	Conclusions	7
5.1.	En-route Consultation	7

Publication History

Issue	Month/Year	Change Requests and summary
1	June 2025	Scoping Request

Document Use

External use: Yes

Referenced Documents

1. Background

1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3. Application Details

Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Ravengill Energy Park Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Hub (m)	Tip (m)
1	55.4508	-3.7753	287818	618876	135	220
2	55.4473	-3.7686	288227	618468	135	220
3	55.4440	-3.7903	286849	618133	135	220
4	55.4405	-3.7841	287226	617738	135	220
5	55.4359	-3.7763	287709	617214	135	220
6	55.4341	-3.7975	286364	617049	135	220
7	55.4300	-3.7916	286722	616588	135	220
8	55.4261	-3.7859	287073	616142	135	220
9	55.4584	-3.7109	291906	619614	135	220
10	55.4555	-3.6973	292761	619274	135	220
11	55.4527	-3.6879	293346	618944	135	220
12	55.4506	-3.7025	292418	618728	135	220
13	55.4473	-3.6959	292825	618355	135	220
14	55.4542	-3.7214	291231	619163	135	220
15	55.4497	-3.7208	291257	618660	135	220
16	55.4472	-3.7133	291728	618374	135	220
17	55.4424	-3.7055	292208	617823	135	220
18	55.4446	-3.7281	290781	618106	135	220
19	55.4420	-3.7210	291226	617800	135	220
20	55.4379	-3.7141	291648	617338	135	220
21	55.4435	-3.7379	290157	618004	135	220
22	55.4382	-3.7324	290494	617403	135	220
23	55.4347	-3.7241	291010	616998	135	220
24	55.4280	-3.7029	292331	616223	135	220
25	55.4236	-3.7095	291904	615736	135	220
26	55.4185	-3.7188	291300	615191	135	220
27	55.4129	-3.7244	290928	614577	135	220
28	55.4200	-3.6865	293345	615301	135	220
29	55.4157	-3.6940	292862	614836	135	220
30	55.4078	-3.7120	291699	613988	135	220
31	55.4032	-3.7064	292040	613466	135	220
32	55.4132	-3.6874	293271	614553	135	220

Table 1 – Turbine Details

4. Assessments Required

The proposed development falls within the assessment area of the following systems:

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Great Dun Fell Radar	54.6841	-2.4509	61.2	113.3	316.2	CMB
Lowther Hill Radar	55.3778	-3.7530	2.2	4.1	104.1	CMB
Perwinnes Radar	57.2123	-2.1309	117.9	218.3	207.2	CMB
Tiree Radar	56.4556	-6.9230	121.9	225.8	118.3	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
Lowther Rx	55.3853	-3.7432	1.7	3.1	100.9	Rx
Lowther Tx	55.3902	-3.7355	1.3	2.4	108.8	Tx

Table 2 – Impacted Infrastructure

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on Lowther RADAR

Using the theory as described in Appendix A and development specific propagation profile 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.

Degradation in the performance of the co-located SSR is expected. Work is ongoing to fully understand the technical impact and subsequently determine how operationally significant or not this is likely to be.

4.1.2. Predicted Impact on Cumbernauld RADAR

Using the theory as described in Appendix A and development specific propagation profile 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.

4.1.3. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Prestwick Centre ATC	PSR impact in isolation is Unacceptable, any additional impact on the SSR will need to be assessed.

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

It is clear that there will be some degradation in the performance of the Lowther Hill air ground air installation from some of the closer, higher turbines. Work is ongoing to determine the likely volume within which this degradation is likely to occur and subsequently determine how operationally significant or not this is likely to be.

5. Conclusions

5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, and although work is required to fully explore the extent of this the degradation that has already been identified would, in isolation be deemed to be unacceptable.

Appendix A – Background RADAR Theory

Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of P_t the power density, P , at a range of r is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where G_t is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of σ , this can be treated as if the object re-radiates the pulse with a gain of σ and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area, A_e , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where G_r is the RADAR antenna's receive gain in the direction of the object and λ is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable L .

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where r_t and r_r are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams



Figure 1: Proposed development location shown on an airways chart

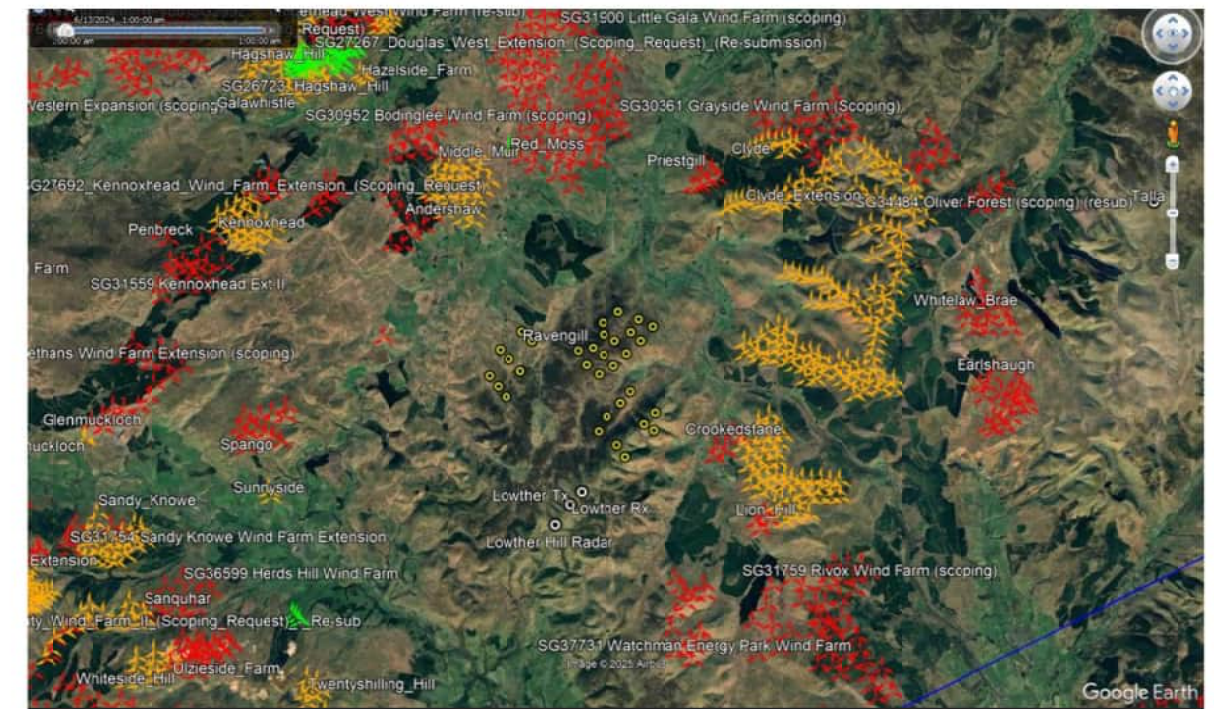


Figure 2: Proposed development shown alongside other recently assessed applications



From: [ONR Land Use Planning](#)
To: [Econsents Admin](#)
Subject: ONR Land Use Planning - Application ECU00006172 - Ravengill Energy Park
Date: 11 June 2025 15:27:50
Attachments: [image001.png](#)
[image001.png](#)

Dear Sir/Madam,

With regard to planning application ECU00006172 - Ravengill Energy Park, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here: (<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Land Use Planning
Office for Nuclear Regulation
ONR-Land.Use-planning@onr.gov.uk

Niall MacQuarrie
Case Officer
Energy Consents Unit
The Scottish Government
Sent by email to: Econsents_Admin@gov.scot

1st July 2025

Dear Niall,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR Ravengill Energy Park

Many thanks for consulting RSPB Scotland on the Request for Scoping Opinion for Ravengill Energy Park (ECU00006172). We have made the following comments in response to the questions set out in the Scoping Report.

Section 3.6 – Ornithology

OR1 – Do consultees agree that the desk study and the field surveys (September 2023 to August 2025) will provide sufficient data to inform a robust impact assessment.

NatureScot guidance states that the area of flight activity survey should encompass the maximum extent of the proposed turbine layouts plus a 500m buffer¹ over a minimum of two years to account for variation. However, the Scoping Report (Section 3.6.3) and Figures 3.6.1-3.6.3 confirm that four turbines were not visible during VP surveys in 2023 and 2024. Figure 3.6.4 also confirms that survey work for breeding waders and Black Grouse did not cover the whole site plus the appropriate buffers. Therefore, it would appear that only one year of ornithology survey work will be completed across the entire site plus the appropriate survey buffers, as the southeast area was not surveyed in 2023/2024. The Scoping report suggests that the above omissions are unlikely to affect the assessment of impact, which we are unable to conclude without full details of survey

¹ NatureScot (2017) Recommended bird survey methods to inform impact assessment of onshore wind farms
<https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms>

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The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

work results already undertaken. We recommend that the above omissions are addressed as part of the EIA process.

OR2 – Do consultees agree that, subject to further information becoming available from the field surveys and desk study, the scope of IOFs to be included in the assessment is appropriate, or at this stage, should any other species be included?

Section 3.6.4 of the Scoping Report states that species not included on the BoCC red-list will be scoped out of further assessment. Black Grouse is a red-listed, UK BAP species which is undergoing serious declines in southern Scotland. With fewer than 200 lekking males recorded across the region by conservation organisations since 2022, there are growing concerns that this species may become regionally extinct. Page 43 of the Scoping Report confirms that Black Grouse are present within the Proposed Development site during the breeding season, yet this species is not listed as an IOF on page 46 and appears to have been scoped out of further assessment. Due to the status of this species both regionally and nationally, **we strongly recommend that Black Grouse is included as an IOF and scoped in to further assessment at EIA.**

The Proposed Development is situated within a key area for breeding waders, as evidenced by the Clyde Valley Wader Initiative (CVWI) which has recorded wader densities of regional importance through survey work in the area. Through this initiative, RSPB Scotland works closely with local farmers and landowners to assist the trialling and funding of habitat management to maintain the status of breeding waders in this area. The BTO Wader Map² confirms that this area is of high importance for breeding waders. Whilst the Scoping Report states that eight species of breeding wader have been recorded on site through survey work, it is only planning to scope in red-listed species. This would exclude the wider breeding wader assemblage and amber-listed declining species, including Oystercatcher, Snipe, Redshank, Common Sandpiper, and Ringed Plover, all of which are amber or red-listed on the BoCC³. Due to the high importance of this area for breeding wader species, **we strongly recommend that the full assemblage of breeding waders recorded on site is scoped in for further assessment at EIA to allow for an accurate assessment of impacts.**

We agree with the Scoping report that it is not possible to scope out species at this stage and we recommend that all raptor species that have been recorded on site remain scoped in for full assessment during the EIA process. We also recommend that this assessment includes all potential impacts, and not just collision risk which is suggested. We disagree with the decision to scope out “effects relating to any target species not identified to be breeding within the relevant Study Area” (page 45), as this does not take into account impacts on important foraging areas that support breeding populations, or impacts on roosting or wintering species, such as raptors.

OR3 – Do consultees agree that all designated sites, with the exception of the Muirkirk and North Lowther Uplands SPA in the context of breeding merlin, can be scoped out from detailed assessment within an Habitat Regulations Assessment (HRA) or EIA context, due to it not being likely that significant effects would arise?

The Muirkirk and North Lowther SPA is noted in the Scoping Report as being c.3.6km from the site. Whilst this is outside the core foraging range for qualifying feature breeding

² <https://app.bto.org/wader-map/>

³ Stanbury et al (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain.

Hen Harrier (2km), it is well within the maximum range of 10km⁴. Page 43 notes that for Hen Harrier “two potential breeding attempts” were recorded during survey work, and we consider that there is potential connectivity to the SPA population. Whilst the site lies outwith the core foraging range for qualifying feature breeding Golden Plover (3km), it is well within the maximum range for this species (11km)⁴. Golden Plover were recorded both during flight activity surveys and breeding bird surveys, and we consider that there is potential connectivity to the SPA population. **We strongly recommend that sufficient information is included in the EIA to allow an Appropriate Assessment of the impacts of this proposal on qualifying species Hen Harrier, Golden Plover, and Merlin in relation to the Muirkirk and North Lowther SPA.**

Short-eared Owl and Peregrine Falcon were both recorded on site, and are included as part of the breeding bird assemblage feature of the North Lowther Uplands SSSI. The Proposed Development site falls within the maximum range for both of these species (5km and 18km, respectively), which suggests potential connectivity with this SSSI. We therefore recommend that the Muirkirk and North Lowther Uplands SSSI remains scoped into the EIA.

OR5 – Do consultees agree that the methodology and scope of the assessment is appropriate?

The footprint of the Proposed Development intersects and overlaps the footprint of a proposed afforestation scheme (Glenochar⁵), which is currently at EIA Scoping stage. However, we could not find any mention of this scheme within the Scoping Report, and it is proposed to scope out forestry issues (4.7). Due to the importance of this area for breeding waders, and the potential for cumulative impacts of the Proposed Development and the proposed afforestation scheme on these sensitive species, **we strongly recommend that the Glenochar proposed afforestation scheme is included within the assessment of cumulative impacts.**

The sections on construction and operational impacts (page 44) of the Proposed Development on birds conflates the issues of human disturbance with those of displacement due to development. These are two separate issues, and their impacts on ornithology should be assessed separately for both construction and operational phases.

We note the statement in Table 3.2 that cumulative schemes to be considered would include onshore wind developments “within 15km of the Site”. However, we recommend that the cumulative assessment should consider all development proposals within the relevant NHZ in line with NatureScot guidance⁶. As the boundary of the Proposed Development includes areas of both NHZ 19 and NHZ 20, we recommend that the assessment of cumulative impacts should include all developments within both of these NHZs, in line with NatureScot guidance⁷. For species such as Black Grouse, Golden Eagle, and Hen Harrier, where more recent data on population estimates are available, the most up to date data should be used to ensure a robust assessment of impacts for the Proposed Development, and cumulative impacts.

⁴ NatureScot (2016) Assessing Connectivity with Special Protection Areas (SPAs)

<https://www.nature.scot/sites/default/files/2022-12/Assessing%20connectivity%20with%20special%20protection%20areas.pdf>

⁵ <https://www.glenocharforest.co.uk/>

⁶ NatureScot (2018) Assessing the cumulative impacts of wind farms on birds

<https://www.nature.scot/sites/default/files/2018-08/Guidance%20-%20Assessing%20the%20cumulative%20impacts%20of%20onshore%20wind%20farms%20on%20birds.pdf>

⁷ NatureScot (2018) Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas <https://www.nature.scot/doc/guidance-note-assessing-significance-impacts-bird-populations-onshore-wind-farms-do-not-affect>

QR6 – Are there any other relevant consultees who should be contacted, or other sources of information that should be referenced with respect to the ornithology assessment?

We strongly recommend that the Applicant submits a data request to RSPB Scotland for relevant ornithology data which we hold for this area, including Hen Harrier tagging data. A data request should also be made with the South of Scotland Golden Eagle Project (SSGEP) through Restoring Upland Nature (RUN) for their Golden Eagle tagging data. Neighbouring wind farms and afforestation projects will also hold relevant ornithological data for this proposal. We recommend that local records centres (SWSEIC and TWIC) and the Raptor Study Groups are also approached for any relevant data they may hold.

Other Comments

Section 3.5.3 of the Scoping Report states that “two proposed turbine locations (T3 and T6) are currently located within areas mapped as Class 1 peatland”. Class 1 peatlands have been identified as nationally important areas of priority peatland habitats of high conservation value. Due to the importance of peatland in terms of both habitat and carbon storage, **we recommend that Turbines 3 and 6 are relocated to avoid impacts on Class 1 peatlands.**

We hope that our comments are useful. If you have any questions or would like to discuss our comments further, please get in touch.

Yours Sincerely,

REDACTED

Sarah West
Conservation Officer
sarah.west@rspb.org.uk

From: [Stewart Snape](#)
To: [Scottish Forestry Conservancy, Central Scotland](#); [Niall Macquarrie](#)
Subject: RE: Request for Scoping Opinion Ravensgill Energy Park
Date: 12 June 2025 12:12:50
Attachments: [image001.png](#)
[image002.png](#)

Dear Niall,
Request for Scoping Opinion Ravensgill Energy Park

Thank you for the opportunity to comment on this proposal. I have reviewed the scoping report and note that it includes the following statements:

- “It is anticipated that no areas of sensitive woodland or commercial forestry plantation would be affected by the Proposed Development. Therefore, there will be no requirement for the development of forestry felling and re-stocking proposals in accordance with The Scottish Government’s Control of Woodland Removal Policy”,
- “The Ancient Woodland Inventory (AWI)⁴⁴ shows there are no stands of ancient woodland located within the Site.”

Consequently, as currently formulated, the proposals do not affect any forestry interests.

Regards
Stewart

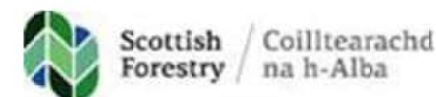
My working days are Wednesday, Thursday and Friday

Stewart Snape MICFor, MRSB
Regulations and Development Manager
Scottish Forestry
Central Scotland Conservancy | Bothwell House | Hamilton Business Park | Caird Park |
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Website: forestry.gov.scot

Brave values are the roots that underpin Scottish Forestry, to create a workplace where our staff, and the people we work with, feel valued, supported and respected.

Be professional, **Respect** others, **Act** with honesty and integrity, **Value** teamwork and collaboration and **Encourage** innovation and creativity.



Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

From: Niall Macquarrie <Niall.Macquarrie@gov.scot> **On Behalf Of** Econsents Admin
Sent: 10 June 2025 10:45
Subject: Request for Scoping Opinion Ravengill Energy Park

Dear Consultee,

**ELECTRICITY ACT 1989
 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
 (SCOTLAND) REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36
 APPLICATION FOR Ravengill Energy Park**

On **9th May 2025**, **Ravengill Energy Park Limited** (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section **36** application for the **Ravengill Energy Park**. The proposed development comprises 32 wind turbines (220m to tip) and a current assumed generating capacity of 7 MW each. The proposed development also includes a Battery Energy Storage System (BESS) of 50 MW. The current expected total capacity is approximately 274 MW.

Ancillary infrastructure will include a crane hardstanding at the base of each turbine, a substation, control building, external transformers, new access tracks and site entrances, temporary construction compounds and laydown areas and borrow pits. The proposed site, covers an area of approximately 5,184 hectares (ha), is located north of Leadhills village, south of Abington village and west of the A74(M) motorway.

The proposed development is located in the planning authority area of **South Lanarkshire Council** in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Ravengill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006172** and then click on **Documents** tab.

The indicative wind turbine OS grid co-ordinates details can be found at **Appendix B - Table B.1.** of the Scoping Report. The turbine dimensions below should be considered indicative as the actual dimensions that would be delivered will depend on turbine selection as part of the procurement process post-consent. **The rotor diameter is 170m. The hub height 135m.**

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **1st July 2025**. Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

To view our current casework please visit www.energyconsents.scot





Niall.Macquarrie@gov.scot

Niall MacQuarrie
Case Officer
Energy Consents Unit
Energy Infrastructure
Directorate for Energy and Climate Change
The Scottish Government
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Our Ref: 12412
24 July 2025

Dear Mr MacQuarrie

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 – REGULATION 12

ECU ref: ECU00006172

Proposal: Scoping Opinion Request for S.36 Application for Ravengill Energy Park, comprising up to 32 x 7mW wind turbines of maximum blade tip height 220m, 50 mW Battery Energy Storage System (BESS) and Associated Infrastructure and Works.

Site: Approximately 1 km to the north of Leadhills village and 1.5 km south of Abington village, located within the planning authority areas of South Lanarkshire Council

Thank you for your email of 10 June 2025, seeking feedback on the scoping report prepared by Ravengill Energy Park Ltd, in respect of the above, proposed development. We thank you for granting us an extension of the original response deadline, within which to submit our comments.

ScotWays Recorded Routes

The national Catalogue of Rights of Way (CROW) was created by ScotWays in the early 1990s with the assistance of Scottish Natural Heritage (now NatureScot) and local authorities, and is an amalgamation of rights of way information from a number of different sources. Mapped at 1:50,000

scale, CROW does not include all rights of way: many of these are known only to local people and come to ScotWays' notice only when a problem arises.

CROW is updated on an ongoing basis to take account of new information as it comes to ScotWays' attention.

The enclosed map shows that rights of way SL135 and SL164-167, as recorded in CROW, all cross or bound the application site (the Site) as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout.

The enclosed map shows that Scottish Hill Tracks (5th edition) SHT(5)058 crosses or bounds the Site as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout.

The enclosed map shows that Scottish Hill Tracks (6th edition) SHT(6)058 and SHT(6)058a cross or bound the Site as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout. South Lanarkshire Council (SLC) Core Path CL/3529/1 Hunt Law Hill – Snarhead coincides with SHT(5)058 and SHT(6)058a.

In searching our records at this scoping stage, we have focussed solely on the immediate area of the proposed application. If required by the applicant to inform its Environmental Impact Assessment Report (EIAR), maps of a wider search area are available from the Society, alongside a more detailed response.

Other Access to Land

You should be aware that other forms of public access to land may affect the proposed Site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes.

In addition to the recorded recreational access routes referred to above that cross or bound the Site, the enclosed map shows that various rights of way, as recorded on CROW, pass in close proximity to the north-east and south-west of the Site. In addition, Heritage Paths (HPs) 'Roman Road from Moffat to Abington' and 'Muirkirk to Wanlockhead Drove Road' lie between 3km and 1km to the east and south-west of the Site respectively. The Southern Upland Way, a popular long distance recreational route, passes west to east between 1 and 4km to the south-west and south of the Site.

Other obvious, defined routes exist adjacent to and within the Site, notably including aspirational SLC Core Paths CL/5701/1 Snar Farm-Leadhills and CL/5690/1 LMC Leadhills to Elvanfoot Dis'd Rlwy. These routes are likely to be used by recreational walkers, cyclists and equestrians, and the applicant should be aware the right of access conferred on the public by Section 1 of the Land Reform (Scotland) Act 2003 (LRSA) is exercisable over them, as well as most, if not all, of the Site (see Comments below).

We welcome the fact section 3.3.2 of the Scoping Report (the Report) indicates that the Study Area for landscape and visual receptors in the Landscape and Visual Impact Assessment (LVIA) chapter of the applicant's Environmental Impact Assessment Report (EIAR) will extend to 25km for "Routes and long distance footpaths" and 5km for "Core Paths and Rights of Way". However, section 3.3.3 Baseline Conditions refers to the Southern Upland and Annandale Ways and National Cycle Route 7, but fails to mention the recorded rights of way, HPs, SHTs and Core Paths referred to above. As

such, it appears deficient in failing to take account of the full recreational access baseline. We believe the LVIA should also assess the development's impact on these routes.

Although we have no objection to the 15 preliminary viewpoints proposed in Table 3.3.1 of the Report, we consider the list is not sufficiently comprehensive and request specifically the EIAR provides representative wirelines or photomontages, illustrating the impact of the proposed development on views from recreational routes SL135 and SL164/165/167 and SHT(5)058/SHT(6)058, within the Site, as well as from the B7040 public road which bisects the Site.

Proximity of Wind Turbines to Public Access Routes

ScotWays understands there is limited guidance on the siting of wind turbines relative to established paths and rights of way, so uses the following principle as the starting point when considering what would constitute a reasonable safeguarding distance between proposed turbines and existing access routes:

"a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line."

We consider the above represents a reasonable principle to follow when seeking to site turbines safely. ScotWays is likely to object to any proposed layout which does not apply the above principle, including where a micro-siting allowance could lead to turbine encroachment upon a route because it has been insufficiently buffered.

In that respect, we request the applicant be required to ensure turbines 7 and 8, as shown on Figure 1.2 Scoping Report – Scoping Layout, are located at least blade tip height safeguarding distance away from routes SHT(5)058/SHT(6)058, and that turbine 5 at O.S. grid reference NS877171 and turbine 26 at grid reference NS913152, as shown on Figure 1.2 Scoping Report – Scoping Layout, are located at least blade tip height safeguarding distance away from the defined routes Priest's Pool to Leadhills (part of which forms aspirational SLC Core Path CL/5701/1 Snar Farm-Leadhills) and Glengeith to Glen Ea's Hill (part of which forms aspirational SLC Core Path CL/5690/1 LMC Leadhills to Elvanfoot Dis'd Rlwy) respectively. The requested safeguarding distance should take account of any micro-siting allowance.

Impact on Existing Public Access Routes

Whilst Figure 1.2 Scoping Report – Scoping Layout suggests the proposed development might have no direct impact on the aforementioned recorded and obvious, defined routes within the Site (provided turbines 7 and 8 are sited more than blade tip height away from routes SHT(5)058/SHT(6)058), the lack of information on other elements of the proposed development, such as the BESS, sub-station, construction compound etc., means no definitive conclusion can be drawn in that regard, at this stage in the process. The applicant should employ appropriate management measures to ensure continuity of public access over the aforementioned, recorded and defined routes within the Site, during the construction, operational and decommissioning phases of the proposed wind farm. In particular, any gates or structures proposed for erection or installation to manage legitimate, non-vehicular, public access or deer movement within or through the Site should be designed to permit access by all user categories (pedestrians, cyclists and equestrians).

Access Route/User Amenity

As well as direct impacts of development upon public access and specific routes, ScotWays is concerned about its indirect impacts on recreational amenity, including the impact of wind farm development on the character of the landscape traversed by access routes, the cultural heritage of such routes and the experience and enjoyment of access users. Consequently, we expect the applicant to take into account both access user amenity and landscape impacts in developing their proposals for the Site. To that end, as stated above, we would expect the EIAR LVIA to provide representative wirelines or photomontages, illustrating the impact of the proposed development on views from routes SL135 and SL164/165/167 and SHT(5)058/SHT(6)058, within the Site. In addition, HPs 'Roman Road from Moffat to Abington' and 'Muirkirk to Wanlockhead Drove Road' should be included in the EIAR's Cultural Heritage baseline for the "Outer Study Area" and the impact of the proposed development on their cultural heritage value assessed.

Potential for Consequential Public Access Improvements

In addition to the potential enhancement to public access resources provided by the formation of new, and upgrading of existing, tracks to provide access to the proposed turbines (the extent and location of which the Report provides no detail), the EIAR should explore opportunities to link the Site into the wider public access network, such as the formalisation and way marking of aspirational SLC Core Path CL/5701/1 Snar Farm-Leadhills, at least to the Site boundary north-west of Glendorch.

Cumulative Impact

ScotWays welcomes the fact the applicant intends assessing the cumulative effects of the proposed development with other operational, under construction, consented and within the planning process wind farms within a 15-20km radius of the Site, and that the final list of windfarms assessed will be agreed with statutory consultees (sections 3.3.3 and 3.3.4 and Figure 3.3.3 of the Report refer).

Comment

Section 3 of the LRSA imposes a duty on landowners to use and manage land responsibly, in a way which respects public access rights. Under section 14 of the LRSA, access authorities have a statutory duty "to assert, protect and keep open and free from obstruction or encroachment any route, waterway or other means by which access rights may reasonably be exercised" and a similar duty under Section 46 of the Countryside (Scotland) Act 1967, "to assert, protect, and keep open and free from obstruction or encroachment any public right of way which is wholly or partly within their area." In addition, the applicant will be aware that access rights conferred on the public are a material planning consideration.

Accordingly, we recommend the applicant prepares an Access Management Plan (AMP) for the proposed development, for submission in support of a S.36 application, should the development progress to that stage, and seeks the input of SLC's Landscape and Access Development Team when preparing the AMP. The AMP should identify all rights of way and other defined paths and tracks through the Site and take account of how the statutory right of access currently affects the Site, showing any areas currently outwith or excluded from statutory access rights under part 1 of the LRSA; and consider the range of users involved (which might include walkers, cyclists, horse-riders). It should set out the effect the proposed development will have on the access resources identified, during its construction, operational and decommissioning phases, including showing

clearly (preferably in map form) any areas proposed for exclusion from statutory access rights; all paths and tracks proposed for construction, for active travel users; and any diversions of paths - temporary or permanent - proposed for the purposes of the development. An AMP will serve to clarify those areas where access rights will be exercisable and ensure continuity of public access through the site at all stages of the proposed development.

Having read the relevant sections of the Report, we are generally content with the proposed methodology of the EIAR, but find it deficient in certain details, as described above. That being said, we are content with the majority of the scope of the EIAR, subject to the following provisos:

1. In the EIAR chapter detailing the Legislative and Policy Context of the proposed development, the applicant should assess the proposed development against the provisions of National Planning Framework 4 (NPF4) Policy 13(b)(viii), which states, "Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they..... Adequately mitigate any impact on local public access routes.", in addition to the other NPF4 policies referred to in Appendix C of the Report;
2. As well as the various relevant policies of the adopted SLC Local Development Plan 2 (LDP2) and associated planning guidance, the EIAR should also consider the proposed development in the context of SLC LDP3, which is currently in preparation;
3. As mentioned above, we would wish the EIAR to provide representative wirelines or photomontages, illustrating the impact of the proposed development on views from routes SL135 and SL164/165/167 and SHT(5)058/SHT(6)058, within the Site, as well as from the B7040 public road which bisects the Site;
4. The EIAR should commit to ensuring, so far as is reasonably practicable, that the aforementioned rights of way and Scottish Hill Tracks, together with the obvious, defined routes within the site referred to above, are kept open and free from obstruction or encroachment during all phases of the development - construction, operational and decommissioning - to maintain public recreational access into and through the Site; and
5. Figure 1.2 Scoping Report – Scoping Layout does not show the proposed location of the BESS or associated infrastructure, such as the proposed Site access, sub-station, turbine access tracks, construction compounds, borrow pits etc. We expect the EIAR to contain that information in detail, to enable consultees, including ScotWays, to submit a fully informed and meaningful response to the S.36 application for the proposed wind farm, if and when it is submitted.

I hope the information and comments provided prove useful to both the Scottish Government and the applicant. Please do not hesitate to contact us at info@scotways.com if you have any further queries.

Yours sincerely
REDACTED

Neil Feggans MRTPI, MIPROW
Access Officer



CROW Guidance Notes - Windfarm Developments

These notes explain what is shown on the map(s) provided with our comments and provide information about the public right of access to land in Scotland. All maps are provided on a 1:50,000 scale base.

What is the Catalogue of Rights of Way (CROW)?

CROW was created by ScotWays in the early 1990s with the help of Scottish Natural Heritage (now NatureScot) and local authorities and is an amalgamation of rights of way information from a number of different sources. Mapped at 1:50,000 scale, the catalogue does not include all rights of way – many of these are known only to local people and come to ScotWays' notice only when a problem arises.

CROW is continually updated to take account of new information as it comes to ScotWays' attention.

What is a Recorded Right of Way?

Any right of way that we record in the Catalogue of Rights of Way.

Where any Recorded Rights of Way pass through or close to the wind farm application site a map will be provided showing them.

What is an Other Route?

Any path that we record in the Catalogue of Rights of Way that does not appear to meet the criteria to be a right of way.

Where any Other Routes pass through or close to the wind farm application site a map will be provided showing them.

What is a Heritage Path?

A historic route that forms part of the transport heritage of Scotland. Such routes reflect our cultural and social development and include drove roads, military roads, Roman roads, pilgrim routes and trade routes.

These routes may or may not be rights of way, core paths or carry some other type of designation.

Find out more about the Heritage Paths project at <http://www.heritagepaths.co.uk>

Where any Heritage Paths pass through or close to the wind farm application site a map will be provided showing them.

What is a Scottish Hill Track?

First published in 1924, our book *Scottish Hill Tracks* is a record of the network of paths, old roads and rights of way which criss-cross Scotland's hill country, from the Borders to Caithness.

The Scottish Rights of Way and Access Society, 24 Annandale Street, Edinburgh EH7 4AN (Registered Office)
0131 558 1222 info@scotways.com www.scotways.com

ScotWays is a registered trade mark of the Scottish Rights of Way and Access Society, a company limited by guarantee.
Registered Company Number: SC024243. Scottish Charity Number: SC015460.

These publicised routes may or may not be rights of way, core paths or carry some other type of designation.

Copies of our book *Scottish Hill Tracks* can be purchased from the ScotWays webshop: <https://www.scotways.com/shop>

Where any *Scottish Hill Tracks* routes pass through or close to the wind farm application site a map will be provided showing them.

Disclaimer

The routes shown on the CROW maps provided have been prepared from information contained in the records of ScotWays, local authorities, judicial and other records. The inclusion of a route in CROW is not in itself definitive of its legal status.

Other Public Access Information

You should be aware that other forms of public access to land may affect the wind farm application site.

Unrecorded Rights of Way

Our records only show the rights of way that we are aware of. Scots law does not require a right of way to be recorded in a specific document or register. Any route that meets the following criteria will be a right of way. This could include any paths, tracks or desire lines within your area of interest. A right of way:

1. Connects public places.
2. Has been used for at least 20 years.
3. Follows a more or less defined route.
4. Has been used by the public without judicial interruption or the landowner's permission.

Core Paths

The Land Reform (Scotland) Act 2003 requires all access authorities to create a system of routes within their area. These are known as core paths and are recorded in the authority's core paths plan. It is anticipated that applicants will have consulted the relevant access authority's core paths plan to check whether any core paths cross or are close to the wind farm application site, and will also have consulted the authority's access team.

The General Right of Access

Irrespective of the presence or absence of rights of way and core paths, the land in question may be subject to the access rights created by Section 1 of the Land Reform (Scotland) Act 2003. Unless the land falls into one of the excluded categories in Section 6 of this Act, the public has a right of access to the land, and land owners/managers have a duty under the Act's Section 3 to consider this in any decisions made about the use/management of the land.

Other Promoted Routes

There may be a promoted route running through or close to any wind farm application site. Such routes will usually be clearly marked with signposts or waymarking and may feature in guidebooks, leaflets, on local information boards and on websites. The two main types of nationally promoted routes are:

Scotland's Great Trails: <https://www.scotlandsgreattrails.com>

National Cycle Network: <https://www.sustrans.org.uk/map-ncn>

Public and Private Roads

The Roads (Scotland) Act 1984 created the terms 'public road' and 'private road'. Public roads are those roads which are on the List of Public Roads and which, importantly, the roads authority is required to manage and maintain. Private roads are those roads which are not on the List of Public Roads and thus there is no duty on the roads authority to manage or maintain them. There is a public right of passage over these roads and the owner(s) of a private road may not restrict or prevent the public's right of passage over the road.

If required, the local roads authority should be contacted by the applicant for more information on public and private roads that may cross or pass close to the application site.

More Information on Outdoor Access Law

If you would like to know more about outdoor access law, visit our website (<https://scotways.com/outdoor-access/>) or get a copy of our book "*The ScotWays Guide to the Law of Access to Land in Scotland*" by Malcolm M Combe (<https://www.scotways.com/shop>).

Development and Planning Applications

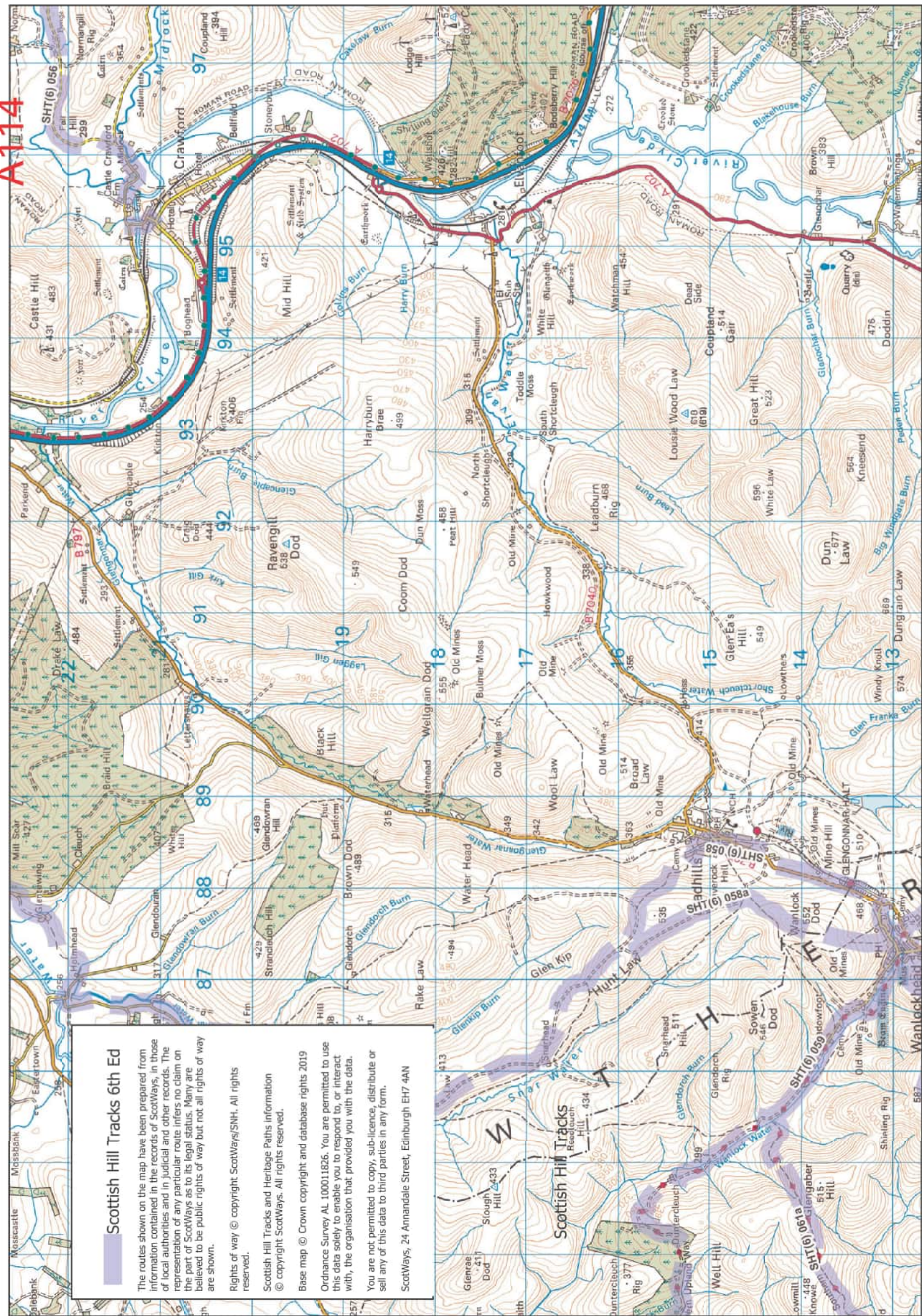
When proposing to develop a site, it is advisable that the applicant reviews the current amount and type of public access across it and presents this as an access management plan as part of their application. This should include rights of way, core paths, other paths and tracks, and take account of how the statutory right of access currently affects the site.

The plan should then set out the effect that the proposed works, both during construction and upon completion, would have on the patterns of public access identified. Any good practice guidance associated with the proposed type of development should be considered, e.g. for windfarms the NatureScot "*Good Practice during Wind Farm Construction, Part 8 Recreation and Access*" and "*Siting and Designing Wind Farms in the Landscape*", and the policies contained within any local statutory plans.

Depending upon the proposals, there may be specific legal processes that must be followed to divert any paths or tracks whether temporarily or permanently. These will be in addition to getting planning consent for the proposal. We recommend that applicants contact the access team at the relevant access authority for advice in this regard.



A114



A115



Scottish Water
Trusted to serve Scotland

Friday, 20 June 2025

Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Follow Us

Dear Customer,

Ravengill Energy Park, North of Leadhills , South of Abington, South Lanarkshire, ML12 6TA
Planning Ref: ECU00006172
Our Ref: DSCAS-0134863-B7L
Proposal: A wind farm and associated infrastructure including a Battery Energy Storage System (BESS) located on land approximately 1 km north of Leadhills village and 1.5 km south of Abington village, South Lanarkshire, Scotland.

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Asset Impact Assessment

Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals.

SW Internal
General

The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

Written permission must be obtained before any works are started within the area of our apparatus

Surface Water

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 refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Ruth Kerr
Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and

to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:

- Site Investigation Services (UK) Ltd
- Tel: 0333 123 1223
- Email: sw@sisplan.co.uk
- www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Development Operations department at the above address.

- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.

- Please find information on how to submit application to Scottish Water at our Customer Portal.

Niall MacQuarrie
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

econsents_admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR RAVENGILL ENERGY PARK

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Ramboll in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises approximately 32 turbines with a maximum tip height of 220m and a Battery Energy Storage System (BESS), located south of Abington village and west of the A74(M) Junction 14.

Site Access

We note that a detailed access review is currently underway to confirm the preferred access routes into the site and the optimal location for these. The current access points under consideration are identified as follows:

- Access for AIL traffic to the northern and western clusters will **likely be direct from the A74(M) motorway**, with a crossing of the B797 to access the western cluster. Consultation with the motorway operator will be progressed to confirm the most appropriate means of achieving deliveries direct from the M74.
- AIL deliveries for the southern cluster will likely be from the A702 (having exited the A74(M) at junction 14 (northbound)).
- Construction traffic will likely use the A74(M), A 702 and B797.

A118



Your ref:
ECU00006172

Our ref:
GB01T19K05

Date:
18/06/2025

A119

With regard to the potential for taking direct access from the motorway, Transport Scotland is not aware of any discussions having taken place regarding a potential direct access from the A74(M) and would draw attention to NPF4 Policy 13, which states the following:

While new junctions on trunk roads are not normally acceptable, the case for a new junction will be considered by Transport Scotland where significant economic or regeneration benefits can be demonstrated. New junctions will only be considered if they are designed in accordance with relevant guidance and where there will be no adverse impact on road safety or operational performance.

Notwithstanding the above, any new/upgraded accesses onto the trunk road network would require the applicant to deliver a junction designed in compliance with the requirements of the Design Manual for Roads and Bridges (DMRB), specifically CD123 - Geometric design of at-grade and signal-controlled junctions. We would recommend that early consultation is undertaken with the Transport Scotland Area Manager for the A74(M) who is David Fleming David.Fleming@transport.gov.scot in relation to access options.

Assessment of Environmental Impacts

Section 3.8 of the SR presents the proposed methodology for the assessment of Traffic and Transport. This states that the assessment will be carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)

Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

We note that the proposed study area for the assessment will include the A74(M) to the north of Junction 13 and south of Junction 14, the A702(T) between Junction 14 through to Watermeetings, the B797 between Abington and Leadhills and the B7040 between Elvanfoot and Leadhills.

The SR states that base traffic survey data for the A74(M) would be obtained from the Transport Scotland database, whilst new Automatic Traffic Count (ATC) survey data from the A702(T), B797 and B7040 would be obtained. Future traffic flows will be factored from surveyed data using Low Growth factors estimated from National Road Traffic Forecasts. This is considered appropriate.

It is noted that any impacts associated with the operational and decommissioning phases of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance.

Abnormal Loads Assessment

The SR indicates that detailed swept path analysis will be undertaken for the main constraint points on the route from the port of entry (likely to be King George V Docks, Glasgow) through to the site access junction to demonstrate that the turbine components can be delivered to Site and to identify any temporary road works which may be necessary.

We would add that a full Abnormal Loads Assessment report should be provided that identifies key pinch points on the trunk road network, with details provided with regard to any required changes to street furniture or structures along the route.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully
REDACT

Iain Clement

Transport Scotland
Roads Directorate

cc Alan DeVenny – SYSTRA Ltd.

ANNEX B

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) advice on freshwater and diadromous fish and fisheries in relation to onshore wind farm developments.

July 2020 updated September 2023

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provides internal, non-statutory, advice in relation to freshwater and diadromous fish and fisheries to the Scottish Government's Energy Consents Unit (ECU) for onshore wind farm developments in Scotland.

Atlantic salmon (*Salmo salar*), sea trout and brown trout (*Salmo trutta*) are of high economic value and conservation interest in Scotland and for which MD-SEDD has in-house expertise. Onshore wind farms are often located in upland areas where salmon and trout spawning and rearing grounds may also be found. MD-SEDD aims, through our provision of advice to ECU, to ensure that the construction and operation of these onshore developments do not have a detrimental impact on the freshwater life stages of these fish populations.

The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity Index and support valuable recreational fisheries.

A good working relationship has been developed over the years between ECU and MD-SEDD, which ensures that these fish species are considered by ECU during all stages of the application process of onshore wind farm developments and are similarly considered during the construction and operation of future onshore wind farms. It is important that matters relating to freshwater and diadromous fish and fisheries, particularly salmon and trout, continue to be considered during the construction and operation of future onshore wind farms.

In the current document, MD-SEDD sets out a revised, more efficient approach to the provision of our advice, which utilises our generic scoping and monitoring programme guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>). This standing advice provides regulators (e.g. ECU, local planning authorities), developers and consultants with the information required at all stages of the application process for onshore wind farm developments, such that matters relating to freshwater and diadromous fish and fisheries are addressed in the same rigorous manner as is currently being carried out and continue to be fully in line with EIA regulations. At the request of ECU, MD-SEDD will still be able to provide further and/or bespoke advice relevant to freshwater and diadromous fish and fisheries e.g. site specific advice, at any stage of the application process for a proposed development, particularly where a development may be considered sensitive or contentious in nature.

MD-SEDD will continue undertaking research, identifying additional research requirements, and keep up to date with the latest published knowledge relating to the

impacts of onshore wind farms on freshwater and diadromous fish populations. This will be used to ensure that our guidelines and standing advice are based on the best available evidence and also to continue the publication of the relevant findings and knowledge to all stakeholders including regulators, developers and consultants.

MD-SEDD provision of advice to ECU

- MD-SEDD should not be asked for advice on pre application and application consultations (including screening, scoping, gate checks and EIA applications). Instead, the MD-SEDD scoping guidelines and standing advice (outlined below) should be provided to the developer as they set out what information should be included in the EIA report;
- if new issues arise which are not dealt with in our guidance or in our previous responses relating to respective developments, MD-SEDD can be asked to provide advice in relation to proposed mitigation measures and monitoring programmes which should be outlined in the EIA Report (further details below);
- if new issues arise which are not dealt with in our guidance or in our previous responses, MD-SEDD can be asked to provide advice on suitable wording, within a planning condition, to secure proposed monitoring programmes, should the development be granted consent;
- MD-SEDD cannot provide advice to developers or consultants, our advice is to ECU and/or other regulatory bodies.
- if ECU has identified specific issues during any part of the application process that the standing advice does not address, MD-SEDD should be contacted.

MD-SEDD Standing Advice for each stage of the EIA process

Scoping

MD-SEDD issued generic scoping guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

If a developer identifies new issues or has a technical query in respect of MD-SEDD generic scoping guidelines then ECU should be informed who will then co-ordinate a response from MD-SEDD.

Gate check

The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application.

Developers will be required to provide a gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.

EIA Report

MD-SEDD will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/status/Pressures>). The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist 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 should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:

- any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area;
- the presence of a large density of watercourses;
- the presence of large areas of deep peat deposits;
- known acidification problems and/or other existing pressures on fish populations in the area; and
- proposed felling operations.

Post-Consent Monitoring

MD-SEDD recommends that a water quality and fish population monitoring programme is carried out to ensure that the proposed mitigation measures are effective. A robust, strategically designed and site specific monitoring programme conducted before, during and after construction can help to identify any changes, should they occur, and assist in implementing rapid remediation before long term ecological impacts occur.

MD-SEDD has published guidance on survey/monitoring programmes associated with onshore wind farm developments (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which developers should follow when drawing up survey and/or monitoring programmes.

If a developer considers that such a monitoring programme is not required then a clear justification should be provided.

Planning Conditions

MD-SEDD advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent. We recommend, where required, that a Water Quality Monitoring Programme, Fisheries Monitoring Programme and the appointment of an Ecological Clerk of Works, specifically in overseeing the above monitoring programmes, is outlined within these conditions and that MD-SEDD is consulted on these programmes.

Wording suggested by MD-SEDD in relation to water quality, fish populations and fisheries for incorporation into planning consents:

1. No development shall commence unless a Water Quality and Fish Monitoring Plan (WQFMP) has been submitted to and approved in writing by the Planning Authority in consultation with Marine Directorate – Science Evidence Data and Digital (MD-SEDD) and any such other advisors or organisations.
2. The WQFMP must take account of the Scottish Government's MD-SEDD guidelines and standing advice and shall include:
 - a. water quality sampling should be carried out at least 12 months prior to construction commencing, during construction and for at least 12 months after construction is complete. The water quality monitoring plan should include key hydrochemical parameters, turbidity, and flow data, the identification of sampling locations (including control sites), frequency of sampling, sampling methodology, data analysis and reporting etc.;
 - b. the fish monitoring plan should include fully quantitative electrofishing surveys at sites potentially impacted and at control sites for at least 12 months before construction commences, during construction and for at least 12 months after construction is completed to detect any changes in fish populations; and
 - c. appropriate site specific mitigation measures detailed in the Environmental Impact Assessment and in agreement with the Planning Authority and MD-SEDD.
3. Thereafter, the WQFMP shall be implemented within the timescales set out to the satisfaction of the Planning Authority in consultation with MD-SEDD and the results of such monitoring shall be submitted to the Planning Authority on a 6 monthly basis or on request.

Reason: To ensure no deterioration of water quality and to protect fish populations within and downstream of the development area.

Sources of further information

NatureScot (previously "SNH") guidance on wind farm developments -

<https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/renewable-energy-development/onshore-wind-energy/advice-wind-farm>

Scottish Environment Protection Agency (SEPA) guidance on wind farm developments –

<https://www.sepa.org.uk/environment/energy/renewable/#wind>

A joint publication by Scottish Renewables, NatureScot, SEPA, Forestry Commission Scotland, Historic Environment Scotland, Marine Scotland Science (now MD-SEDD) and Association of Environmental and Ecological Clerks of Works (2019) Good Practice during Wind Farm Construction -

<https://www.nature.scot/guidance-good-practice-during-wind-farm-construction>.

Annex 1 (revised September 2023)

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) – EIA Checklist

The generic scoping guidelines should ensure that all matters relevant to freshwater and diadromous fish and fisheries have been addressed and presented in the appropriate chapters of the EIA report. Use of the checklist below should ensure that the EIA report contains the following information; the absence of such information **may necessitate requesting additional information** which could delay the process:

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. A map outlining the proposed development area and the proposed location of: ○ the turbines, ○ associated crane hard standing areas, ○ borrow pits, ○ permanent meteorological masts, ○ access tracks including watercourse crossings, ○ all buildings including substation, battery storage; ○ permanent and temporary construction compounds; ○ all watercourses; and ○ contour lines;			

2. A description and results of the site characterisation surveys for fish (including fully quantitative electrofishing surveys) and water quality including the location of the electrofishing and fish habitat survey sites and water quality sampling sites on the map outlining the proposed turbines and associated infrastructure. This should be carried out where a Special Area of Conservation (SAC) is present and where salmon are a qualifying feature, and in exceptional cases when required in the scoping advice for other reasons. In other cases, developers can assume that fish populations are present;			
3. An outline of the potential impacts on fish populations and water quality within and downstream of the proposed development area;			
4. Any potential cumulative impacts on the water quality and fish populations associated with adjacent (operational and consented) developments including wind farms, hydro schemes, aquaculture and mining;			

5. Any proposed site specific mitigation measures as outlined in MD-SEDD generic scoping guidelines and the joint publication "Good Practice during Wind Farm Construction" (https://www.nature.scot/guidance-good-practice-during-wind-farm-construction);			
6. Full details of proposed monitoring programmes using guidelines issued by MD-SEDD and accompanied by a map outlining the proposed sampling and control sites in addition to the location of all turbines and associated infrastructure. At least 12 months of baseline pre-construction data should be included. The monitoring programme can be secured using suitable wording in a condition.			
7. A decommissioning and restoration plan outlining proposed mitigation/monitoring for water quality and fish populations. This can be secured using suitable wording in a condition.			

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. Any designated area (e.g. SAC), for which fish is a qualifying feature, within and/or downstream of the proposed development area;			
2. The presence of a large density of watercourses;			
3. The presence of large areas of deep peat deposits;			
4. Known acidification problems and/or other existing pressures on fish populations in the area; and			
5. Proposed felling operations.			