

Technical Appendix 1.4: Scoping Opinion

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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion on behalf of Scottish Ministers under the
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Ravengill Energy Park
Ravengill Energy Park Ltd**

10th September 2025

1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Ravenshill Energy Park Ltd a company incorporated under the Companies Acts with company number SC809424 and having its registered office at 10 Newton Place, Glasgow, United Kingdom, G3 7PR ("the Company") in response to a request dated 5th June 2025 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Ravenshill Energy Park Wind Farm ("the proposed development"). The request was accompanied by a scoping report.

1.2 The proposed development would be located north of Leadhills, Biggar.

1.3 The proposed development comprises of 32 wind turbines (220m blade to tip height) 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.

1.4 In addition to the wind farm, there will be ancillary infrastructure including:

- crane hardstanding at each wind turbine base
- new on-site access tracks with associated watercourse crossings
- underground power cables
- onsite substation and control building
- temporary construction compounds and laydown areas
- extraction of rock from borrow pits
- temporary on-site concrete batching plant
- off-site works to facilitate large deliveries
- temporary anemometer masts

1.5 The Company indicates the proposed development would be decommissioned after 40 years and the site restored in accordance with the decommissioning and restoration plan.

1.6 The proposed development is solely within the planning authority of South Lanarkshire Council.

1.7 The site of the proposed development was previously used for lead and gold mining from the 16th to 20th century. There is evidence of disused mines and related assets both on and adjacent to the proposed site.

There are six scheduled monuments within the proposed site boundary.

- Waterhead, platform settlement 900m N of (SM 4714)
- Glengeith, settlement, bastle house and field system (SM 4798)
- North Shortcleuch unenclosed platform settlement (WoSAS 10408)
- Hass Burnt Mound (WoSAS 12012)
- Scapcleuch Burn unenclosed platform settlement (WoSAS 12014)
- Scapcleuch Burn unenclosed platform settlement (WoSAS 12015)

There are no Listed Buildings or Conservation Areas within the proposed development site. It is also outwith the Inventory Garden and Designed Landscape (GDL) and Historic Battlefield.

There are 31 non-designated heritage assets recorded in the Historic Environment Record (HER) within the proposed development site. These do not include assets that form part of the Scheduled Monuments and assets that are non-statutory register sites (NSR). The non-designated heritage assets include:

- Prehistoric features such as platform settlements and burnt mounds.
- Medieval features include a possible chapel, burial ground and possible field clearance.
- Post medieval assets, largely relating to lead mining activity and agrarian activity, including farmsteads, enclosures and field systems.

There have also been 55 assets identified from preliminary examination of historic mapping, that are not recorded in the HER as non-designated assets. These assets largely relate to previous mining activity, sheepfolds, grouse butts and a disused railway.

There are 31 Listed Buildings within 10 km of the proposed development site. The listed building are largely concentrated in the villages of Leadhills and Wanlockhead.

The proposed development lies within 50 km of the Eskdalemuir Seismic Array (EKA) and may be subject to a Seismic Impact Limit (SIL).

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between Ramboll UK Limited (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 10th June 2015. The consultation closed on 4th September 2025. Extensions to this deadline were granted to - Historic Environment Scotland, Leadhills Community Council, Defence Infrastructure Organisation, NatureScot and ScotWays. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 36 of the Electricity Act 1989. All consultation responses received, and the standing advice from MD-SEDD, are attached in **ANNEX A Consultation responses** and **ANNEX B MD-SEDD Standing Advice**.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MD-SEDD, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 The following organisations were consulted but did not provide a response:

- BAA Aerodrome Safeguarding
- Civil Aviation Authority – Airspace
- Clyde River Foundation
- Crawford and Elvanfoot Community Council
- Crown Estate Scotland
- District Salmon Fisheries Board
- Duneaton Community Council
- Fisheries Management Scotland
- Fisheries Trust - Clyde River Foundation
- John Muir Trust
- Mountaineering Scotland

- Oban Airport
- Royal Burgh of Sanquhar and District Community Council
- Scottish Fire and Rescue Service
- Scottish Power Energy Networks (SPEN)
- Scottish Wildlife Trust
- Scottish Wild Land Group
- Shell UK Ltd
- South Strathclyde Raptor Study Group
- Southern Uplands Partnership
- Visit Scotland
- Wanlockhead Community Council
- West of Scotland Archaeology Service
- Woodland Trust

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 36 consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with South Lanarkshire Council, within whose area the proposed development would be situated, NatureScot, Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 5th June 2025 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to South Lanarkshire Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A and Annex B**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 The proposed development set out in the scoping report refers to wind turbines, and other technologies including battery storage. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to:

- the scale of the development (dimensions of the wind turbines, solar panels, battery storage)
- components required for each generating station
- minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage

3.8 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.9 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

3.10 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for onshore wind farm and overhead line development <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 or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.11 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.

3.12 MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.13 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.14 The scoping report identified viewpoints at Table 3.3.1 to be assessed within the landscape and visual impact assessment. South Lanarkshire Council (SLC) are satisfied with the Scoping Report's suggested viewpoint locations and requires no additional visualisations for the EIAR.

ScotWays request additional viewpoints from recreational routes SL135, SL164/165/167 and SHT(5)058/SHT(6)058 that lie within the proposed development. They also request viewpoints from the B7040 public road that bisects the proposed development.

Leadhills Community Council (LCC) requests additional viewpoints:

- Leadhills Football pitch: Grid ref. 288850 614840
- Cattle grid at Glengonnar on the B797. Grid ref. 288002 613450.
- Former railway level crossing site. Grid ref. 293400 617622
- Location on B7040 near Risping Cleuch. Grid ref. 290350 615800
- Coom Dod at Grid Ref: 29100 618300. (LVIA3)

Historic Environment Scotland (HES) requests additional viewpoints for:

- SM4714 Waterhead, platform settlement
- SM4798 Glengeith, settlement, bastle house and field system.

Prehistoric ritual and funerary monuments

- SM4766 Fall Hill, enclosed cremation cemetery 650m NE of Midlock
- SM4238 Crooked Stone, standing stone 160m N of Crookedstane
- SM4254 Fagyad Hill, Cairn
- SM4256 Midlock, cairn 640m NE of
- SM4515 Stoneyburn, cairns 800m SW of
- SM4641 Air Cleuch, cairns 1300m S of Glengeith

Prehistoric forts and enclosures

- SM2614 Kirkton, fort 860m NNE of
- SM2822 Kirkton, fort 1155m ENE of
- SM4527 Collins Burn, enclosure 750m NW of Elvanfoot Bridge
- SM2605 Bodsberry Hill, fort

HES requests a wireline/frame taken from the front (west) elevation of the following asset towards the development site

- LB732 Scot's Mining Company House
- GDL00339 Scot's Mining Company House

NatureScot (NS) requests the use of following viewpoints are included in the LVIA.

- A702 near Glenochar;
- B797 South of Leadhills near Glengonnar Station;
- B7040 Shortcleugh;
- B7040 east of the Hass;
- Allenylic Law;
- Southern Upland Way, Whing Head;
- Southern Upland Way near Glengaber Hill;
- Minor road west of Lettershaws;
- B797 south-west of Lettershaws;
- B797 near Glencapel;
- Green Lowther as opposed to Lowther Hill; and
- B7040/A702 Junction at Elvanfoot.

Scottish Minister's advice that finalised Viewpoints (VP) and wireframes for the EIAR must be agreed in advance of preparation of any visuals with SLC, ScotWays, LCC, NS and HES.

3.15 The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 3 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise".

The Scottish Ministers are aware that the proposed development falls within the statutory safeguarded area around Eskdalemuir Seismological Recording Station. Scientific research has established that wind turbines of current design generate noise emissions that cause seismic vibrations which can interfere with the effective operation of the array. In order to ensure the United Kingdom can continue to implement its obligations in maintaining the Comprehensive Nuclear Test Ban Treaty, a noise budget has been allocated to regulate the development of wind turbines within a 50km radius of the array.

As advised by the Defence Infrastructure Organisation ("the DIO"), the budget has been set at 0.336nm rms and at present the reserved noise budget has been reached. Consequently, the DIO has stated there would be concerns if this proposal progresses to application based upon current information.

The Scottish Ministers request that the company keep up to date with the information provided by the Eskdalemuir Working Group (EWG) and contact the Defence Infrastructure Organisation at the earliest opportunity to discuss any possible mitigation measures. Enquiries regarding the work being undertaken by EWG can be directed to onshorewindpolicy@gov.scot

3.16 As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 3 of the scoping report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.

3.17 It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company, NatureScot and the Royal Society for the Protection of Birds (RSPB) Scotland.

The RSPB Scotland requests that the EIAR discuss the omissions of the 2023/2024 bird surveys that encompasses the entirety of the proposed development site and its 500m buffer.

In regard to the EIAR's Important Ornithological Features (IOFs), Scottish Ministers strongly request that Black Grouse are scoped in for further assessment. Scottish Ministers also request that the full assemblage of breeding waders recorded on the proposed development are scoped in for further assessment in the EIAR.

Scottish Minister's advise that the EIAR includes further information on the impacts that the proposed development could have on Hen Harrier, Golden Plover, and Merlin in relation to the Muirkirk and North Lowther's Special Protected Areas (SPA).

RSPB disagrees with the Scoping Report's decision to scope out "*effects relating to any target species not identified to be breeding within the relevant Study Area*" (page 45 of Scoping Report). This excludes foraging areas that support breeding populations as well as potential impacts of the proposed development on roosting or wintering species.

NatureScot requests that Merlin are included in the EIA's collision risk model and include information on how this might affect the viability of the Merlin's SPA population. Further requests include, maps showing documented flight lines of Merlin from vantage point watches.

The Scottish Ministers recommend bird surveys must be carried out in relation to the qualifying features of the relevant SPAs / SACs.

3.18 Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in '**PAN 50: Controlling the Environmental Effects of Surface Mineral Workings**'.

3.19 Further issues for consideration include but are not limited to, Transport Scotland's request for early consultation on potential site access from the A74(M).

HES are content with the Scoping Report's description of how historical assets will be chosen for consideration for the EIAR but request consultation to ensure the finalised list meets their assessment criteria.

HES also requests further details of proposed access routes and other ancillary works to allow them to provide further comment on potential direct impacts on historical assets.

The Scottish Environment Protection Agency (SEPA) requests that the EIAR include evidence if no development works take place within 250m of a groundwater supply source.

RSPB has also made a request that Turbines 3 and 6 are relocated to avoid impacts on Class 1 peatlands.

RSPB Scotland advises that the proposed development intersects with a proposed afforestation scheme, Glenochar. Scottish Ministers advise that the Glenochar proposed afforestation scheme is included in the EIAR under *cumulative impacts* or a related section.

ScotWays may present an objection if turbines 7 and 8 are within 220m safeguarding distance from routes SHT(5)058/SHT(6)058. ScotWays also requests that turbine 5 and 26 are 220m distance from the defined routes Priest's Pool to Leadhills and Glengeith to Glen Ea's Hill.

Should the developer provide an application for the proposed development, the Joint Radio Company (JRC) would likely object due to its proximity to the Eskdalemuir Seismic Array.

The Ministry of Defence (MOD) would also likely object due to the proposed development's proximity to the Eskdalemuir Seismic Array. The MOD also has concerns that the proposed development would pose a physical obstruction to low flying aircraft within Tactical Training Area 20.

Glasgow Prestwick Airport Ltd would likely object to the proposed development due to its potential impact on the airport's Air Navigation Services Provider (ANSP).

NatureScot would likely object to the proposed development due to its potential impact on the Lowther Hills landscape. They also request that a detailed Peat Condition Assessment is scoped in for the EIA due to turbine 3 and turbine 6 being located on class 1 peatland.

National Air Traffic Services (NATS) have concerns that the proposed development conflicts with their safeguarding criteria. NATS predicts that the Ravensgill's turbines would have a negative impact on Lowther RADAR, Cumbernauld RADAR and Prestwick Centre Air Traffic Control.

HSE has cautioned that the proposed development intersects with three Major Accident Hazard (MAH) pipelines.

- the 11 Feeder Bathgate-Moffat natural gas pipeline (ref 7923_2180)
- the 12 Feeder Bathgate-Moffat natural gas pipeline (ref 7921_2178)
- the NWEF Grangemouth-Stanlow ethylene pipeline (ref 7129)

In regard to these pipelines, Scottish Ministers advise that the EIAR include evidence that the operator of the pipeline has been consulted. The EIAR should also include which areas of the proposed development are restricted due to the pipelines. Furthermore, evidence should be provided that demonstrates consideration has been given for the integrity and protection of the pipelines from developmental and operational works.

The Leadhills Community Council (LCC) requests that the following topics are scoped into the EIAR:

- Population
- Human Health
- Air Quality
- Shadow Flicker
- Aviation Warning Lighting
- Muirkirk and North Lowther SPA
- Detailed Flow Rate Calculations

- Infrasound and Low Frequency Noise, Operational Noise and Amplitude Modulation

The LCC would also like to request that the following animals are included in the EIAR's Ecological Impact Assessment.

- Otter (*Lutra lutra*)
- Hedgehog (*Erinaceus europaeus*)
- Water Vole (*Arvicola amphibius*)
- Common Toad (*Bufo bufo*)
- Palmate Newt (*Lissotriton helveticus*)
- Oyster catchers (*Haematopus longirostris*)

They have also requested that regardless of the results of the baseline surveys, the ecological impact on resident fish populations should be scoped in the EIAR. The LCC also request that further survey work is carried out to document mining assets, including related mineral contamination and metal pollution on the proposed development.

3.20 The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:-

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;
- underground cables;
- water pipes;
- telecommunications links.

3.21 Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.

3.22 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.7 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

Niall MacQuarrie
Energy Consents Unit
10th September 2025



Community And Enterprise Resources
Executive Director **David Booth**
Planning And Regulatory Services

ANNEX A

Consultation

List of consultees who provided a response.

• South Lanarkshire Council	A1-A4
• Historic Environment Scotland	A5-A13
• NatureScot	A14-A23
• Scottish Environmental Protection Agency	A24-A40
• Aberdeen Airport	A41-A43
• British Horse Society	A44-A45
• British Telecommunications plc	A46
• Defence Infrastructure Organisation	A47-A49
• Edinburgh Airport	A50
• Glasgow Airport	A51
• Glasgow Prestwick Airport	A52-A55
• Health and Safety Executive	A56-A59
• Highlands and Islands Airports Limited	A60-A62
• Joint Radio Company Limited	A63-A66
• Leadhills Community Council	A67-A83
• NATS Safeguarding	A84-A95
• Office for Nuclear Regulation	A96
• RSPB Scotland	A97-A100
• Scottish Forestry	A101-A103
• Scottish Rights of Way and Access Society	A104-A114
• Scottish Water	A115-A117
• Transport Scotland	A118-A120

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry and Marine Directorate (in the form of standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) or bespoke advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD)).

See Section 2.4 above for a list of organisations that were consulted but did not provide a response.

Our Ref: P/25/0683
Your Ref: ECU00006172
If calling ask for: Andrew Bennie
Date: 17th June 2025

Mr Niall MacQuarrie
Case Officer
Energy Consents Unit
Scottish Government

By E-mail only.

Dear Mr Mac Quarrie

Electricity Act 1989 The Electricity Works (environmental Impact Assessment) (Scotland) regulations 2017 Request for Scoping Opinion for Proposed Section 36 Application for Ravensgill Energy Park

I refer to your request for comments to inform a scoping opinion made under regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Following internal consultation, South Lanarkshire Council, as Planning Authority would offer the following comments, noting that these comments are made in relation to the above scoping opinion request only and do not provide comment on the proposals themselves.

The structure of the scoping report is considered clear and sets out a prudent approach to the topics that may give rise to likely significant environmental effects and should be fully assessed in the EIA Report. The topics listed in the scoping report are acceptable to the Council and should be fully assessed within the EIA Report.

In addition to the proposed topics, the Council would ask that the EIAR contain a standalone chapter which sets out clearly the proposed mitigation and enhancement measures which are to be brought forward to address those impacts that will/may arise because of the proposed development.

Floor 6, Council Offices, Almada Street, Hamilton, ML3 0AA
Email Andrew.Bennie@southlanarkshire.gov.uk Phone:



In addition to the matters set out above, the following responses are made in response to the “Questions for Consultees” which are set out within the Scoping Report.

Table 3.3.2 – Landscape and Visual Amenities

LVIA1 – South Lanarkshire Council (hereinafter referred to as SLC) is content with the proposed approach to the consultation process associated with this proposed development.

LVIA2 – SLC are content that the coverage of the proposed Study Areas is sufficient to for the purposes of the assessment of landscape and visual receptors (including also the issue of CLVIA).

LVIA3 – SLC are content that the suggested viewpoint locations are sufficient to allow for a full and proper assessment of the potential impact of the proposed development to be carried out.

LVIA4 – SLC are content as regards the proposed approach to the assessment of the effects of the turbine aviation lighting.

LVIA5 – SLC can confirm its agreement to focusing the assessment of the effects on existing landscape designations to those two RSAs which lie within 15km of the Site.

LVIA6 – SLC has no comment to make on this matter.

LVIA7 – SLC can confirm its agreement to the proposed methodology to be applied to the LVIA process.

Table 3.4.2 – Cultural Heritage

CH1 – SLC can confirm its acceptance of the proposed study methodology, including the extent of the proposed Study Areas.

CH2 – SLC would advise that the Scoping Report contains insufficient information to allow it to come to a settled view on this issue. Consequently, adopting a precautionary approach to this matter, SLC would suggest that no identified cultural heritage assets be scoped out of the assessment.

CH3 – SLC do not consider there to be any additional assets beyond the boundary of the Study Areas which would require to be considered as part of this assessment.

CH4 – SLC do not consider that any additional visualisations will be required to inform the assessment.

Table 3.5.3 – Ecology

ECO1 – SCL has no comment to make on this question.

ECO2 – SLC can confirm that the 2024 and proposed 2025 field surveys, coupled with the additional desk studies will be sufficient to properly inform this assessment.

ECO3 – SCL are content with the appropriateness of the proposed study methodology and scope.

ECO4 – SLC would defer to the stance taken by both NatureScot and SEPA on this matter.

ECO5 – SLC can confirm its acceptance of the matters to be scoped out of the assessment.

Table 3.6.1 – Ornithology

OR1 – SLC can confirm that it is content that the desk studies and field surveys identified will provide significant to properly inform the assessment.

OR2 – Subject to the caveat noted, SLC are content as to the scope of the IOFs to be included within the assessment.

OR3 – SLC can confirm that it is content that, with the exception of the Muirkirk and North Lowther Uplands SPA in the context of breeding merlin, all designated sites can be scoped out for further detailed assessment within either an HRA or EIA context.

OR4 – SLC has no comment to make in this matter.

OR5 – SLC can confirm that it accepts that the methodology and scope of the assessment is appropriate.

OR6 – SLC has no comment to make on this matter.

Table 3.7.3 – Hydrology, Hydrogeology and Geology

HYD1 – SLC can confirm its acceptance of the proposed assessment methodology.

HYD2 – SLC can confirm its agreement to the features that are to be scoped out of the assessment.

HYD3 – SLC has no comment to make on this issue.

Table 3.8.1 – Traffic and Transport

TT1 – SLC can confirm its agreement to the extent of the proposed Study Area.

TT2 – SLC are content that this issue can be scoped out of the assessment.

Table 3.9.2 – Noise and Vibration

NV1 – SLC can confirm that it is content as regards the suggested approach for the noise assessment.

NV2 – SLC are content for the assessment to reference previous background noise data acquired around the site.

Table 3.10.6 – Aviation

AV1 – SLC can confirm its agreement to the methods proposed to determine the aviation baseline.

AV2 – SLC can confirm its agreement to the matters to be scoped into of the assessment.

AV3 - SLC can confirm its agreement to the matters to be scoped out of the assessment.

Conclusion

Overall, the scope of topics and assessment methodologies set out within the Scoping Report are considered acceptable by South Lanarkshire Council.

It is again reiterated that this Scoping Response is a technical response in relation to the Scoping Opinion Request and the EIA Regulations and does not provide any advice on the planning merits or other of the proposals and therefore does not prejudice the outcome of any planning application that may be submitted.

Yours faithfully

Area Manager



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to: Econsents_Admin@gov.scot

Niall MacQuarrie
Case Officer
Energy Consents Unit
The Scottish Government

Longmore House
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EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300080657
Your ref: ECU00006172
17 July 2025

Dear Niall MacQuarrie

The Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017
Ravengill Energy Park
Comments on scope of proposed Environmental Impact Assessment

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 10 June 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed Development

We understand the proposed development comprises 32 wind turbines with a maximum tip height of 220m and a battery energy storage system (BESS), plus the ancillary infrastructure listed on page 10 of the scoping report.

Scope of Assessment

We recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts. We have identified likely significant effects on our historic environment interests. Our advice on the nature of these impacts, and any potential mitigation measures, are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

Further Information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

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Scottish Charity No. **SC045925**
VAT No. **GB 221 8680 15**

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultation mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Jessica Malone at jessica.malone@hes.scot.

Yours sincerely

Historic Environment Scotland

ANNEX

Scope of Assessment

We welcome the inclusion of our [Managing Change: Setting](#) guidance and the [EIA Handbook](#) in the list of relevant policy and guidance on page 24. We recommend that any assessment methodology tools not specified in the scoping report, like matrixes, follow the examples in the handbook (if used).

We also welcome that the assessment will consider the potential impacts on designated heritage assets within the context of National Planning Framework 4 (NPF4). However, we note that the scoping report currently references Policy 7h) ii, which applies specifically to scheduled monuments (pg. 28). While this is an important consideration, Policy 7 of NPF4 encompasses a broader range of designated heritage assets, and the EIA report should cite the relevant provision for each type.

The figures provided do not illustrate the proposed associated infrastructure, such as the battery energy storage system (BESS), substation, etc. These may have impacts, and we advise that the EIA report assess the entire development (including access).

We welcome the intention to assess the cumulative impacts of the proposed development with others in the vicinity. We request that we are included in any further consultation on the assessment of cumulative impacts alongside the other consultees listed on page 28. Generally, we advise that cumulative assessments should clearly describe the baseline conditions, and the potential impact or change combined with other existing and reasonably foreseeable developments. The combined impact may be more or less than the sum of the impacts of individual developments. The applicant's assessment should focus on the additional impact (if any) caused by the proposed development.

Our Historic Environment Interests

We advise assessing any physical or setting impacts on designated assets within our remit that the proposals may cause. We generally advise producing wirelines where the assessment suggests impacts could occur and photomontages to illustrate the impacts where these are likely to be significant. Our comments on specific cultural heritage assets are included below.

Scheduled Monuments

The scoping report does not list any scheduled monuments to be scoped in or out of the EIA assessment. However, we are content with the description of how assets will be chosen for consideration in the section titled "Assessment of Effects on Setting" (pg. 27). We recommend further consultation with us as the assessment moves forward, to ensure the list of assets for assessment meets our needs.

We note that no specific approaches to mitigation measures for direct impacts or impacts on setting have been described in the scoping report. We highly recommend that where significant impacts are identified and prove capable of mitigation, this should be considered and inform the iterative design process to avoid or reduce those effects to a level that is no longer significant.



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Inner Study Area

Two scheduled monuments lie within the proposed site boundary:

- [SM4798](#) Glengeith, settlement, bastle house and field system

The monument consists of the remains of an extensive agricultural settlement and bastle house. Also included is an earthwork platform which probably contained a small, defended homestead of possible later prehistoric or early medieval date. The settlement, bastle house and field system straddle the Glengeith Burn within a steep gully. The remains are on the north facing lower slopes of White Hill and extend into more level ground in the valley of the Elvan Water to the north.

Features within the monument have a clear relationship with the topography surrounding them, in particular the bastle house appears to have been located within a gully around the Glengeith Burn, perhaps to provide some shelter as well as a source of water. More widely, features in the monument clearly relate to agricultural exploitation of the lower slopes of the Elvan Water valley. The bastle house is likely to have been positioned on higher slopes overlooking the junction of the Elvan Water and Clyde Valleys to offer some protection from raiders and oversight of their movements. The possible earlier defensive enclosure may have been sited here for similar reasons. Adverse impacts are likely if turbines are positioned in such a way as to dominate this valley or distract in important views to or from the monument. The early assessment of potential impacts on the setting of this monument is strongly recommended. Mitigation in the form of relocation or removal of turbines may be advisable.

- [SM4714](#) Waterhead, platform settlement 900m N of

A single platform scooped into the south-east flank of the hillside N of Carle Gill; this isolated prehistoric house site is situated overlooking the Carle Gill and Glengonnar Water. With views in an arc from north to south, the site has a clear relationship to surrounding topographic features, in particular the lower slopes of the valley and flatter wetter ground in the valley bottom. The house does not appear to have been part of a larger settlement and was deliberately isolated. The nearest indicative turbines are c.1km to the west, with others c1.5km to the south-east. Adverse impacts are likely if turbines are positioned in such a way as to dominate this valley or distract in important views to or from the monument. The impact of any turbines that would be visible above the valley sides should be assessed and impacts mitigated; visualisations are likely to be required to inform this assessment and mitigation by relocation or removal of turbines may need to be considered.

Without details of proposed access routes and other ancillary works we are unable to comment on the potential direct impact of such works on assets within the inner study area.

Outer Study Area

We welcome that site visits to heritage assets in the Outer Study Area will be carried out to inform assessment of setting impacts. In our comments below, we highlight several scheduled monuments that we recommend for detailed assessment because they may experience significant adverse impacts.



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Mining remains in close proximity to the site boundary

- [SM13677](#) Historic gold workings, Leadhills, South Lanarkshire
- [SM5817](#) Lead mines and associated remains, Leadhills
- [SM5597](#) Wanlockhead, remains of lead mining and smelting

Leadhills and Wanlockhead are large areas of lead and gold mining with smelting remains from medieval and later periods, including tracks, buildings, spoil heaps and other associated remains. The remains have functional relationships with each other and the wider landscape that may be understood through views to and across the monuments. Key views may include lines of sight that allow an appreciation of various elements within these complexes and assist an understanding of how mining was organised and changed over time. Important views associated with the Wanlockhead remains tend to be along the valley of the Wanlock Water, which is orientated northwest to southeast. Impacts on these views should be assessed.

The remains at Leadhills are in a more open landscape and the nearest indicative turbines are c.0.4km west of SM5817 and 0.65km north of SM13677. There is potential for views across the monument that contribute to an appreciation of the remains to be adversely impacted. The potential for such impacts needs to be assessed at an early stage of the project, with reference to the effects on any key views. Visualisations are likely to be required to inform this assessment and mitigation by relocation or removal of turbines may need to be considered.

Later prehistoric settlements and burnt mound

- [SM4332](#) Lettershaws, platform settlement 1000m NE of
- [SM5267](#) Glencaple, burnt mound 980m WNW of
- [SM4249](#) Glencaple, platform settlement 600m NW of
- [SM2617](#) Kirkton, settlement 1280m ENE of
- [SM4756](#) Normangill Rig, platform settlement E of Midlock
- [SM4603](#) Boghead, platform settlement 500m SW of
- [SM4486](#) Stoneyburn, platform settlement and field system 700m WSW of
- [SM4516](#) North Shortcleuch, platform settlement 1000m E of
- [SM4296](#) North Shortcleugh, platform settlement 1500m E of
- [SM4646](#) Crookedstane, platform settlement 1300m W of
- [SM4647](#) Crookedstane, platform settlement 200m E of

All these monuments are likely to be later prehistoric in date and the setting of these monuments relates to their topographic locations with settlements cut in to the lower slopes of valleys overlooking more level ground that may have been used for agriculture. Except for SM4603 which is unusually on a north-facing slope and SM4647 which faces west, the platform settlements and burnt mound occupy the lower south and east facing slopes of the valley and have clear relationships to topographic features around them, in particular the lower slopes of the valleys and flatter wetter ground in the valley bottoms. Turbines located near these features have the potential to have significant adverse effects on their setting; however, the setting of these monuments are often relatively restricted, and, in many cases, it should be possible to avoid significant effects through sensitive design of the proposed



development. The impact of any turbines that would be visible above the valley sides should be assessed and impacts mitigated.

Prehistoric ritual and funerary monuments

- [SM4766](#) Fall Hill, enclosed cremation cemetery 650m NE of Midlock
- [SM4238](#) Crooked Stone, standing stone 160m N of Crookedstane
- [SM4254](#) Fagyad Hill, Cairn
- [SM4256](#) Midlock, cairn 640m NE of
- [SM4515](#) Stoneyburn, cairns 800m SW of
- [SM4641](#) Air Cleuch, cairns 1300m S of Glengeith

Fall Hill comprises a Bronze Age cremation cemetery situated in a broad hollow between Fall Hill and Normangill Rig, overlooking the confluence of Camps Water and Midlock Water with the River Clyde to the south-west. Crooked Stone standing stone is a ritual monument of the Neolithic or Bronze Age which is situated on gently sloping land overlooking the valley of the River Clyde close to SM4647 with the River Clyde to the west. Both sites may have been deliberately sited to both have open views and to be seen from a wide surrounding area. The settings of both monuments are therefore much broader and the contribution of such views to their significance should be established, and the impacts of the development assessed and mitigated. It is recommended that the assessment of these assets should be supported by visualisations.

Fagyad hill cairn occupies the summit of Fagyad Hill and may have been deliberately sited to have open views. The contribution of such views to its significance should be established and the impacts of the development assessed and mitigated. It is recommended that the assessment of this asset should be supported by visualisations if visibility of the development is predicted.

Midlock cairn is situated on a small, level platform projecting from the lower south-facing slope of Fall Hill. Nearby cairns are located to the north-west and south-east of the monument and may have a visual relationship with Midlock. Sited overlooking the confluence of Camps Water and Midlock Water with the River Clyde to the south-west, the contribution of such views to its significance should be established and the impacts of the development assessed and mitigated. It is recommended that the assessment of this asset should be supported by visualisations.

The possible burial cairns at Stoneyburn are near the Stoneyburn platform settlement noted above. The cairns are located on the summit of a knoll close to the east bank of the Ellershie Burn. The cairn and settlement are viewed as surviving fragments of a later prehistoric landscape within this part of the Upper Clyde valley and there may be a visual relationship between the two sites that should be considered as part of any assessment. The cairns are not prominent in long distance views and have been positioned on a small knoll in the wetter floor of the valley.

The Air Cleuch cairns consist of an area of ground on the north bank of the Air Cleuch containing numerous small cairns which probably originated from prehistoric agriculture but may also contain human burial remains. The cairns are located on the lower, south-east



facing slopes of Watchman Hill overlooking the Clyde valley. They are not prominent features in long distance views towards them and probably indicate the extent of arable agriculture up the sides of the valley during the later prehistoric period. Turbines located near the cairns noted here have the potential to have significant adverse effects on their setting. It may be possible to avoid effects on the setting of the cairns through sensitive design of the proposed development. It is recommended that the assessment of impacts on these assets should be supported by visualisations.

Prehistoric forts and enclosures

- [SM2614](#) Kirkton, fort 860m NNE of
- [SM2822](#) Kirkton, fort 1155m ENE of
- [SM4527](#) Collins Burn, enclosure 750m NW of Elvanfoot Bridge
- [SM2605](#) Bodsberry Hill, fort

All these enclosed monuments are likely to be later prehistoric in date and the settings of these sites relate to their topographic locations within the Upper Clyde valley. The Collins Burn enclosure is located on a knoll on the wetter valley floor whilst the forts are located on higher summits or promontories, often with extensive views in all directions and clearly situated with reference to the River Clyde. Turbines located near these features have the potential to have significant adverse effects on their setting. The settings of these monuments are therefore broad, and the contribution of such views to their significance should be established and the impacts of the development assessed and mitigated. It is recommended that the assessment of these asset should be supported by visualisations.

Bastle house, settlement and field system

- [SM5385](#) Glenochar Burn, bastle house, post-medieval settlement & field system

The monument consists of an extensive settlement and field system around a bastle house of likely 16th century date. The site is within the valley of the Glenochar Burn, which runs broadly west to east towards the Clyde Valley. The bastle house is located at the confluence of the burn with Rae Cleuch, which runs downslope from the northwest between the slopes of Coupland Gair and Great Hill. The western end of the valley is terminated by the slopes of Kneesend, while the slopes of Doddin rise to the south. The surrounding valley is open and used for upland grazing while to the east the valley opens to the Upper Clyde valley.

The bastle house would have been built to provide security during border raids. Its location within a relatively isolated valley adjacent to a farmtown and within agricultural fields and enclosures, assists in understanding the rural economy and lifestyle of the inhabitants, as well as the need for defence. It is quite likely that the house's location in a remote 'side valley' away from the major communication routes along the Clyde Valley was deliberate. Changes within the surrounding valley since the settlement's occupation are likely to have been relatively minimal, restricted to the replacement of boundaries and the abandonment of cultivated fields. Excavation has suggested that sheep farming was always important, and this remains the principal land use. The settlement would have been abandoned as part of 'agricultural improvements' in the 18th or 19th century, and the monuments will have associative characteristics related to this phase of its history. The atmosphere and appearance of this ruined settlement may contribute to a 'sense of place'.



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The surrounding landscape's relationship to the settlement is clearly important to its understanding and appreciation and this is assisted by interpretative materials associated with the heritage trail promoted by the Biggar Museums Trust. Views from the settlement to the surrounding valley, and to the Clyde Valley to the east, are likely to contribute to this understanding. Views from the valley to the settlement are also likely to be important and the surroundings of the settlement may also contribute to a 'sense of place'. Significant adverse effects are likely if turbines are positioned in such a way as to dominate the valley or distract in important views to or from the monument.

As set out in the scoping report there is a group of turbines proposed on the north side of the Glenlochar valley, with the nearest of the proposed turbines located c.1km to the north-west of the monument. It seems likely that these turbines would be prominent on the skyline along the north side of the glen and may have major adverse impacts on the setting of the monument. The early assessment of potential effects on this monument is strongly recommended and this should include the production of photomontages. Based on the information already available, there is clear potential that turbines on the north side of the valley could have a significant adverse impact on this monument. It may be necessary to re-locate or delete turbines that are proposed to be located on the skyline.

At this stage, we have not identified assets beyond the proposed study areas where significant effects may occur, but we welcome that consideration will be given to designated heritage assets beyond 10km where long-distance views and intervisibility between monuments may be an important aspect of their settings.

Visualisations

We welcome that visualisation viewpoints will be provided for the two monuments within the inner study area:

- [SM4714](#) Waterhead, platform settlement 900m N of
- [SM4798](#) Glengeith, settlement, bastle house and field system

Adverse impacts are likely if turbines are positioned in such a way as to dominate the valleys where the monuments lie or distract in important views to or from the monuments. More than one visualisation for each monument may be needed to establish this.

For the outer study area, we particularly welcome that visualisation viewpoints will be provided for:

- [SM4641](#) Air Cleuch, cairns 1300m S of Glengeith
- [SM5385](#) Glenochar Burn, bastle house, post-medieval settlement and field system
- [SM5817](#) Leadhills, remains of lead mining and smelting
- [SM13677](#) Historic gold workings, Leadhills, South Lanarkshire

In addition, we consider that visualisations are likely to be needed to support the assessment of impacts on the other prehistoric ritual and funerary monuments and the prehistoric forts and enclosures we have highlighted above. These monuments may have important sight lines associated with their functions. For some monuments, more than one visualisation may be needed, reflecting the size of monuments, the size of the proposed

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development, and the importance of views both from and towards monuments.

If wireframes can be provided at an early stage this may assist with both the potential to identify significant impacts and potential to scope out any monuments if significant impacts are not likely, as well as identify if mitigation by design is possible. It will also assist with identifying where photomontages will be required for detailed assessment in addition to wireframes. We would be happy to provide further advice on visualisations as the iterative design of the development progresses, including on the location of viewpoints.

Category A-listed Buildings and Inventory Garden & Designed Landscapes

The proposed development would be located to the north, west and east of the following assets:

- [LB732](#) Scot's Mining Company House
- [GDL00339](#) Scot's Mining Company House

Scot's Mining Company House is a classical two-storey, three-bay house, built in 1736-40. It was built as the manager's house for Leadhills mining settlement. The first occupant of the house was James Stirling, who has been referred to as one of the pioneering figures in Scotland's industrial history.

The house is set on high ground within a contemporary terraced garden, both of which may have been designed by William Adam. The house overlooks the village so that the manager of the mines could literally oversee the mining operations, and as a result, it is a dominant landmark. Although largely enclosed by dense planting, our understanding is that views from the house and garden, through the trees to the surrounding countryside (towards the development site) exist. The principal elevation of the house faces west, towards part of the development site with the nearest turbine being approximately 2km away.

Visualisations

We are content with the proposed scoping. We consider a wireline/frame – taken from the front (west) elevation of the house towards the development site – would be helpful to our assessment. It would demonstrate if turbines would be visible in views from the house and its associated designed landscape. The provided information (ZTV) does not clearly demonstrate if turbines would be visible from this location.

Historic Environment Scotland
17 July 2025

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Niall MacQuarrie
Case Officer
Energy Consents Unit
Scottish Government

By email:
niall.macquarrie@gov.scot
econsents_admin@gov.scot

Dear Niall

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED S36 APPLICATION FOR RAVENGILL ENERGY PARK

Thank you for consulting us on the above proposal on 1 July 2025 and for allowing us additional time to respond.

The proposal is for 32 wind turbines with a maximum blade tip height of 220 metres along with associated infrastructure including a battery energy storage system (BESS). It is located approximately 1km north of Leadhills village and 1.5km south of Abington within the South Lanarkshire local authority area.

Summary

The proposal would likely result in significant effects on the distinctive landscape of the Lowther Hills and setting of Leadhills. The proposal would introduce man-made development of considerable vertical scale and horizontal extent into a landscape which exhibits a unique sense of place stemming from the distinctive combination of historic features, landform, and perceptual responses relating to sense of wildness and isolation, which we consider contribute to the strong sense of identity afforded by this landscape.

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NatureScot is the operating name of Scottish Natural Heritage

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We consider the proposal has the potential to result in significant adverse effects on the distinctive landscape of the Lowther Hills which could lead to a NatureScot objection. We consider that the impacts would be difficult to overcome through design mitigation due to the siting of the proposal.

We provide more detailed comments on this and other site-specific issues in **Annex 1** to this letter, to assist with the Environmental Impact Assessment (EIA) process.

General pre-application and scoping advice

The scoping report broadly covers the topics that we would expect to see included in the EIA report. Our website includes a wide range of standing advice and guidance documents which we recommend the applicants follow in the preparation of the EIA report:
<https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents>.

We recommend the applicants and their consultants review the document *NatureScot pre-application guidance for onshore wind farms*: <https://www.nature.scot/doc/naturescot-pre-application-guidance-onshore-wind-farms>. It is a key resource for issues within our remit and outline our advice on the type of survey and assessment work likely to be required for a future application, sources of further information and guidance on data presentation.

Biodiversity enhancement

We welcome the inclusion of a Biodiversity Net Gain Assessment and Biodiversity Environmental Management Plan. NPF4 sets out a requirement for developments to deliver positive effects for biodiversity, primarily under Policy 3. For national and major developments, or those subject to EIA, Policy 3b notes that proposals will only be supported where it can be demonstrated that they will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. The Policy requires that significant biodiversity enhancements are provided, in addition to any proposed mitigation. We recommend these requirements are adopted as part of any future application. For further advice see: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-enhancing-biodiversity>.

We would advise the applicant to be clear at the application stage with any offsetting and enhancement measures proposed, this should include the level of commitment and minimum deliverables.

Decommissioning

We recommend that the EIA process assesses the likely impacts of decommissioning. Although this can be brief it should still provide an appropriate level of detail on how the site infrastructure may be removed and how the site is intended to be restored.

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NatureScot is the operating name of Scottish Natural Heritage

Conclusion

The scoping report includes a number of questions and we hope those within our remit and relevant to us are answered within this letter.

Please note that while we are supportive of the principle of renewable energy, our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

Please let me know if you or the applicants require any further information or advice from us in relation to this proposal.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours sincerely,

[by email]

Sophia Irvine
Renewable Energy Casework Adviser
sophia.irvine@nature.scot

Annex 1 – details to assist the EIA for the proposed Ravensgill Energy Park

1. Landscape and visual impacts

(a) Distinctive Landscapes

There is a national interest in safeguarding and enhancing the distinctive character and diversity of Scotland's landscapes at the regional scale, including those places, landmarks and views that are acknowledged to capture the essence of what is valued and enjoyed about Scotland's landscapes. Our aim is to ensure that Scotland's landscapes retain their distinctive character and features that contribute to national identity and sense of place.

Proposals that would result in a significant and substantial change either individually or cumulatively to landscapes or iconic landscape features or views, which strongly contribute to the distinctiveness or identity, or enjoyment of Scotland may merit an objection.

(b) The Proposal

The proposal would comprise up to 32 turbines, up to a maximum blade tip height of 220m. There may also be an associated BESS. The site is located around 1km north of Leadhills village and 1.5km south of Abington within the South Lanarkshire local authority area. The Proposed Development site comprises an area of 5184 hectares of the Southern Uplands between around 499m and 404m AOD with the layout of the proposed turbines set within three distinct upland clusters between around 494m and 677m AOD (Rake Law and Dun Law).

The site is within the Southern Uplands LCT with a spur of the Upland Glen – Glasgow and Clyde Valley LCT south-west of Abington also contained within the site boundary. The site is also located entirely within the Leadhills and Lowther Hill Special Landscape Area (SLA).

There are numerous operational wind farms within the surrounding area. Within 25km of the site these include the Clyde and Clyde Extension around 4km east, Middlemuir 7.8km north-west, Hagshaw Cluster 15.8km north-west, Harestanes and Minnygap 15.9km south-east, and Sandy Knowe, Hare Hill, Whiteside and Sanquhar 17.2km south-west of the proposal.

(c) Planning History

The site encapsulates a former proposed wind energy development site which was located around 5km north-east of Leadhills. This site was subject to a previous Application in 2017 (ECU Reference: 00005277) for Harryburn Wind Farm (16 turbines¹, 149.9m to blade tip

¹ Turbine numbers amended during application process from seventeen to sixteen

height). NatureScot² objected to the proposal due to significant impacts on the distinctive landscape of the Lowther Hills and setting of Leadhills.

The Harryburn Wind Farm was refused planning permission following public inquiry on the 27th September 2019. The Report to the Scottish Ministers for the Harryburn Wind Farm proposal, states the following in relation to concluded effects on the Lowther Hills distinctive landscape: *'The proposal...would lead to an unacceptable loss of the character and distinctiveness of the Lowther Hills. This distinctiveness is regionally important and we share the concerns of Scottish Natural Heritage in this respect. The proposal would extend the influence of wind farms to the west and would have a dominant influence on the Upland Valleys landscape and the setting of Leadhills which is one of the highest villages in Scotland and is designated as a conservation area'*³. **We consider that the proposal would result in similar and intensified impacts on the Lowther Hills distinctive landscape to that of the refused Harryburn Wind Farm.**

(d) Summary of Key Issues

Distinctive Landscape

A review of the ZTV provided for the proposal shows that there would be extensive visibility over the Lowther Hills, Leadhills, Wanlockhead, B797 and B7040 north-east of Conrig Hill and Threehope Height. Given the predicted visibility of the proposal over the Lowther Hills, we consider that the Lowther Hills distinctive landscape would be highly susceptible to effects from the proposal.

The national importance of the distinctive landscape of the Lowther Hills has been previously established⁴. The landscape of the Lowther Hills is characterised by *'a small but dramatic range of smoothly domed hills, incised by deep glens'*⁵, clearly distinct from the more subdued surrounding Southern Uplands in which they sit'. The ZTV shows that the landscape which has the potential to be significantly affected by the proposal is an area where the distinctive character of the Lowther Hills is most clearly expressed, with a key feature being the setting this landscape provides for the remote and historic mining villages of Leadhills and Wanlockhead. Given the height of the proposed turbines, at around 70m taller than the Harryburn Wind Farm proposal, we consider the proposal would have the potential to result in extensive effects on this distinctive landscape. Based on the information available we consider the following impacts on the distinctive landscape of the Lowther Hills could arise from the siting, vertical scale and horizontal extent of the proposal:

² Formerly Scottish Natural Heritage (SNH)

³ Harryburn Wind Farm: Reporters' Conclusions – Report to Scottish Ministers (29th August 2019)

⁴ NatureScot: Harryburn Wind Farm Response Letter dated 06 October 2017 and Harryburn Wind Farm: Reporters' Conclusions – Report to Scottish Ministers (29th August 2019)

⁵ NatureScot: Landscapes of Scotland Description – 74. Lowther Hills

- *Diminish the perceived scale of the Lowther Hills when experienced from Leadhills village, the B797 and other access routes to and through the hills;*
- *Erosion of the strong sense of wildness and isolation which is expressed in this landscape;*
- *Impacts on the unique sense of place afforded by the distinctive combination of historic features and landform;*
- *Landscape setting of Leadhills village - the characterful, historic villages of Leadhills and Wanlockhead, set within and enclosed by the Lowther Hills, are strongly defined by their landscape context;*
- *Detraction from a sense of Leadhills village being perceived as a remote destination embedded within the hills, and from the village as a visual focal point within the wider landscape;*
- *Effects on the strong aesthetic qualities displayed in this landscape – colour and texture, land cover of the heather-clad hills in contrast to the surrounding offorested areas which contain wind farms;*
- *Impacts on the journey through this landscape to the core area of hills from the B797, B7040 and Southern Upland Way; and*
- *Cumulative effects with other wind energy developments.*

We advise that a comprehensive assessment of effects on the distinctive landscape of the Lowther Hills is included within the LVIA, which takes the above aspects into consideration. We advise that the LVIA should draw not only from LCT descriptions but also on perceptual responses (both scenic and wildness/ tranquillity/ dark skies)⁶ given that this is a landscape which evokes a strong sense of wildness, remoteness and isolation.

The proposed Ravengill Energy Park, 32 turbines to blade tip height of up to 220m, would be around 70m taller than the previous Harryburn Wind Farm proposal and is likely to raise similar and potentially intensified issues to the Harryburn proposal in relation to the distinctive landscape of the Lowther Hills and setting of Leadhills. Effects would result from the proposals siting, which we consider would be difficult to overcome through design mitigation.

Strategic Development Pattern

A review of the cumulative base plans for the surrounding area shows the evolution of the overall strategic pattern of wind energy development within 20km of the proposal since 2017. It is important to note that the Lowther Hills are currently free from wind energy development⁷, in contrast to the substantial amount of existing and consented wind energy development in surrounding areas. While other distant operational wind farm developments are visible from the hills surrounding Leadhills and Wanlockhead, operational wind farms generally continue not to be experienced as prominent or characterising features from the distinctive landscape of the Lowther Hills. The proposal would extend wind energy

⁶ Landscape Institute Technical Guidance Note 02-21 Assessing Landscape Value Outside National Designations: Table 1 - Range of factors that can be considered when identifying landscape value - [LI TGN 02-21](#)

⁷ Evolving area of interest from wind energy development to the south-east within the Lowther Hills east of the A702 with currently two sites at application (Daer and Rivox) and one site at scoping stage (Watchman).

development westward from the established wind energy development pattern present around the M74 into a distinctive, core area of the Lowther Hills. *'We consider that, in order to maintain the distinctiveness of this landscape and some degree of landscape diversity in this part of Scotland, it is important to achieve some balance between wind farms and undeveloped landscapes. We [consider] that bringing wind farm development into the heartland of these distinctive hills risks this balance being lost'*⁸.

The Lowther Hills plays a vital role in affording diversity to the landscape in this part of Scotland, affording a contrast to the substantial volume of existing and consented wind farm development in the surrounding area, achieving a balance between wind energy development and undeveloped landscapes. The Proposed Development would extend development into a distinctive, core area of the Lowther Hills which exhibits a unique sense of place; a landscape which is dramatic in scenic terms with strong aesthetic qualities, and a strong perception of remoteness and wildness.

(e) Mitigation

Demonstration of mitigation through design should be detailed in the submission, relating to reducing impacts on distinctive landscapes with a strong sense of place and identity. Based on the limited information available we do however consider that effects resulting from the proposal would not be readily mitigated due to the siting of and nature of the Proposed Development.

(f) Scoping Report Questions

LVIA 1: Are consultees in agreement with the proposed approach to consultation?

Consultation on night-time viewpoints and visualisations will be required.

LVIA 2: Are consultees in agreement with the proposed Study Areas for the assessment of landscape and visual receptors (including CLVIA)?

We are in agreement.

LVIA 3: Are there any comments or suggestions in relation to the viewpoint locations proposed in Table 3.4.1?

We consider there to be an underrepresentation of viewpoints relating to capturing potential impacts on the distinctive landscape of the Lowther Hills and recommend the following be included in the LVIA:

- A702 near Glenochar;
- B797 South of Leadhills near Glengonnar Station;
- B7040 Shortcleugh;
- B7040 east of the Hass;
- Allenylic Law;
- Southern Upland Way, Whing Head;
- Southern Upland Way near Glengaber Hill;

⁸ NatureScot: Harryburn Wind Farm Response Letter dated 06 October 2017

- Minor road west of Lettershaws;
- B797 south-west of Lettershaws;
- B797 near Glencapel;
- Green Lowther as opposed to Lowther Hill; and
- B7040/A702 Junction at Elvanfoot.

360-degree baseline photography from viewpoints should be included.

LVIA 4: Are there any comments on the approach to assessing the effects of turbine aviation lighting?

We advise that NatureScot guidance is consulted for the assessment of effects from turbine lighting: [NatureScot: Guidance on Aviation Lighting Impact Assessment \(November 2024\)](#). It is noted that further consultation will be carried out for viewpoints to be taken forward for night-time photomontages. Lighting mitigation measures should be stipulated within the assessment and state if these have been agreed with the Civil Aviation Authority (CAA). Lighting intensity mapping should also be included.

LVIA 5: Are consultees in agreement that the assessment of the effects on landscape designations should focus on two RSAs located within 15 km of the Site?

South Lanarkshire Council and Dumfries and Galloway Council will comment further on this matter.

LVIA 6: Are there any comments or suggestions on the approach to cumulative landscape and visual assessment?

No comment.

LVIA 7: Are consultees in agreement with the proposed methodology to be applied to the LVIA?

We are in agreement.

2. Protected areas

We recommend that the design and layout aims to avoid direct and indirect impacts to the protected areas outlined below. Further information can be found on SiteLink at: <https://sitelink.nature.scot/home>.

Muirkirk and North Lowther Uplands Special Protection Area (SPA)

The proposal is located approximately 3.5km from the Muirkirk and North Lowther Uplands SPA, protected for its populations of a number of breeding and non-breeding bird species. The proposal is within core foraging range for Merlin which is a qualifying species of the SPA and therefore means there is a likely significant effect on the SPA.

The status of the SPA means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") or, for reserved matters, The Conservation of Habitats and Species Regulations 2017 apply. Consequently, Scottish

Ministers will be required to consider the effect of the proposal on the SPA before it can be consented (commonly known as Habitats Regulations Appraisal). Further information on the this process is available on our website: <https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra>.

We agree that information to inform an Appropriate Assessment is provided in the ornithology chapter of the EIA report. An assessment of potential collision risk for Merlin and how this might affect the viability of the Merlin SPA population along with maps showing flight lines of Merlin recorded during vantage point watches should be included in the EIA report.

Raven Gill SSSI

Raven Gill SSSI lies within the site boundary and is designated for its geological importance as it has nationally important fossil-bearing sedimentary rocks and exposures of the Arenig – Llanvirn age. Although there is no infrastructure proposed to be undertaken within the SSSI it is important to ensure potential indirect impacts are considered particularly impacts relating to composition and structure of geological exposures, their visibility and accessibility. Any new access tracks should not encroach any further towards the SSSI and water levels within the SSSI should not be altered unnaturally by construction works outwith the SSSI.

3. Ornithology

(a) Scoping Report Questions

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?

We have not yet seen full details of the survey methods, results and assessment, so cannot comment on whether the data collected is sufficient at this stage. Our standard advice is that two years of survey should be undertaken unless a shorter period can be justified. The EIA report will require justification why two years has not been undertaken for the whole site. As per our guidance viewpoint surveys should encompass the maximum extent of potential turbine layouts and should extend to 500m beyond the outermost proposed turbines.

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?

We are in agreement subject to further information from the field surveys.

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?

We are in agreement subject to further information from the field surveys.

OR4 - Do consultees agree with the proposal to scope out effects relating to lighting/decommissioning and ornithology?

We are in agreement subject to further information becoming available from the field surveys.

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

It is stated that the assessment will be undertaken in line with our guidance. Any deviations to our guidance should be detailed in the EIA Report.

OR6 - 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?

No comment.

4. Priority peatland habitats

Turbine 3 and turbine 6 are currently located within areas mapped as Class 1 peatland. We do not agree that a detailed Peat Condition Assessment is scoped out of the assessment.

We recommend that survey and assessment for peatland habitats follows our peatland guidance: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>. This guidance contains advice on the mitigation hierarchy, survey and assessment, mitigation and enhancement, including peatland restoration techniques, Habitat Management Plans and the level of information we would expect in an application.

5. Protected species

We recommend that all survey work for protected species covers the proposed development site, access and appropriate buffers around these, as well as any areas proposed for habitat management/enhancement.

We would expect the EIA report to demonstrate that all survey, assessment and mitigation for protected species has followed our standing advice for protected species at: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents>. This link contains detailed advice on protected species survey methods (including timing of surveys, survey area and shelf-life), Species Protection Plans, mitigation and licence applications. If protected species could be affected mitigation details/Species Protection Plans should also be included in the EIA report.

Niall Macquarrie
ECU

Our Ref: PCS-20005839
Your Ref: ECU00006172

By email only to: Econsents_Admin@gov.scot

SEPA Email Contact:
planning.south@sepa.org.uk

17th June 2025

Dear Niall Macquarrie

**Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
ECU00006172**

Scoping Opinion: 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.

Ravengill Energy Park, North of Leadhills village, South of Abington village and West of the A74(M) motorway

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development. We welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter and would especially welcome further pre-application engagement once the higher resolution peat probing, peat



condition assessment and habitat survey work; including the proposed further NVC work; has been completed and the layout developed further as a result.

Our position and advice, given below, is based on the Scottish Ministers ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 Soils and 22 Flood risk and water management, as defined in National Planning Framework 4 (NPF4). If this is not the case, please advise so we can re-consider our position and advice. We consider that this also covers the requirements in NPF4 Policies 2 Climate mitigation and adaption, 3 Biodiversity and 11 Energy.

Advice for the determining authority

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to waterbodies, overlain with proposed permanent and temporary development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in [Appendix 1](#) below, which provides details of our standard information requirements for EIA development and the form in which they must be submitted, and [Appendix 2](#), which provides additional development type specific advice, be addressed to our satisfaction in the EIA process.

We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment.

1. Site specific comments

- 1.1 There are some areas of deep peat (up to 4.5m) and areas of Class 1 peatland on site. We therefore expect the application to be supported by a comprehensive site-specific peat management plan. As noted above, we would

welcome the opportunity to comment on the site layout once it has been informed by the higher resolution peat probing.

- 1.2 It is noted that further NVC surveys are to be undertaken to ensure coverage of the site. For further information on assessments please refer to the Habitat survey screening for potential GWDTE section of our [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#). The [Good practice during wind farm construction](#) guidance document also provides useful information on NVC survey method and mapping requirements.
- 1.3 It is outlined within the Scoping Report that a number of Private Water Supplies are present within the site boundary and others in the vicinity. Please refer to 4.5 and 4.6 of Appendix 2 for further guidance. Should it emerge that no development will take place within 250 m of a groundwater supply source, it would be helpful if the Environmental Impact Assessment Report (EIAR) provides evidence to confirm this.
- 1.4 Any Water Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.
- 1.5 Further advice on Battery Energy Storage Systems can be found [here](#).

If you have queries relating to this letter, please contact us at planning.south@sepa.org.uk including our reference number in the email subject.

Your sincerely,

Lee Harkness
Senior Planning Officer
Planning Service

Ecopy to: Niall.Macquarrie@gov.scot

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

Appendix 1: SEPA Energy generation and transmission EIA scoping requirements

Please note that some of our planning guidance referenced in this response has been reviewed and updated to reflect the [National Planning Framework 4](#) (NPF4) policies. For example, our [Flood Risk Standing Advice](#), [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#).

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below and in [Appendix 2](#) depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

1. Site layout

- 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information.
- 1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.
- 1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development haven't avoided for example near-natural peatland, adequate justification should be

provided for the proposed layout. The justification should include how any impacts are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by maps with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.

2. Peatland and other carbon rich soils (CRS)

- 2.1 Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. Where proposals are on peatland or other CRS, the following should be submitted to address our requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage).
- 2.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.
- 2.3 The submission should include a series of layout drawings, at a usable scale, showing all permanent and temporary infrastructure, along with the ancillary construction work areas, with the extent of excavation required. These plans should be overlaid on the following:
 - a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy

in NPF4, which may be more than that outlined in the [Peatland Survey – Guidance on Developments on Peatland \(2017\)](#).

- b) Peat depth survey showing interpolated peat depths.
- c) Peatland condition mapping – the [Peatland Condition Assessment](#) photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

2.4 The detailed series of layout drawings above should clearly demonstrate that peat excavation has been avoided where possible. Where complete avoidance of peat and other CRS is not possible, justification should be provided to adequately demonstrate why this is the case, and it should be clearly demonstrated on the drawings that:

- a) Development proposals avoid any near natural peatland and the deepest areas of peat.
- b) All proposed excavation is on peat less than 1m deep, where feasible.
- c) The volumes of peat excavated have been reduced as much as possible, first through layout and then by design, making use of techniques such as floating tracks.

2.5 The Outline Peat Management Plan (PMP) must include:

- a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.
- b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas

disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed).

- c) Details of proposals for temporary storage and handling of peat – [Good Practice during Wind Farm Construction](#) outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss.
- d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use.
- e) If peat is to be used in the reinstatement of borrow pits on site, cross sections and plans should be provided showing the proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat also being given. The target restoration habitat for each borrow pit should be specified, along with how this will be maintained and managed in perpetuity.
- f) Use of excavated peat in areas not disturbed by the development itself is no longer a matter we provide planning advice on. Please refer to [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) 2023, and the [Peatland ACTION – Technical Compendium](#), which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental

authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this can be found in the document [Is it waste - Understanding the definition of waste](#).

3. Water environment

- 3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.
- 3.2 The submission must include a set of drawings showing:
- a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies.
 - b) The minimum buffer around each waterbody, as detailed in Table 1 of [Recommended Riparian Corridor Layer for use in Land Use Planning](#), from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature.

- c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved.

- 3.3 Further advice and our best practice guidance are available on our sepa.org.uk/regulations/water/engineering/ webpage. Guidance on the design of water crossings can be found in the [Construction of River Crossings Good Practice Guide](#).
- ### 4. Groundwater Dependent Terrestrial Ecosystems and existing groundwater abstractions
- 4.1 The construction and operation of developments can disrupt groundwater flow and impact on Groundwater Dependent Terrestrial Ecosystems (GWDTE), which are protected under the Water Framework Directive, and existing groundwater abstractions. The layout and design of the development must avoid adverse impacts on such areas, ensuring the water environment, including GWDTE and existing groundwater abstractions, are protected.
- 4.2 As detailed in our [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#), a phased approach to the assessment of risks to GWDTE and groundwater abstractions is recommended, with greater detail being required for higher risk sites or activities.
- 4.3 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the Environmental Impact Assessment Report (EIAR) and commencement of development.