

Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.4 A Phase 1 habitat survey should be provided unless the developer is already aware that GWDTE are likely to be present. Where initial assessment results indicate relevant habitats may be present, a National Vegetation Classification (NVC) survey should be submitted, along with the following information:

- a) A set of drawings demonstrating all GWDTE are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved, a conceptual site model (CSM) should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime, and the ecological features present. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling in addition to topography, properties of the emergent water and the soil, and underlying geology. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.
- c) Please note that while we will accept The UK Habitat Classification System (UKHab) as an alternative to a Phase 1 habitat survey, due to discrepancies in habitat definition and ambiguity in correspondence with NVC types, we do not accept the use of the UKHab as an alternative to NVC.

Existing groundwater abstractions

4.5 The source (rather than the property it supplies) of both public and private water supply groundwater abstractions, both within and outwith the site boundary, should be identified. Scottish Water holds information regarding public water supplies and the Local Authority holds records of private water supplies. Note that the information

held by the Local Authority will sometimes relate to the property served by the private water supply, rather than the location of the source itself (e.g. the house rather than the borehole or spring). Therefore, the details of each private water supply source require confirmation, including a site walkover survey.

4.6 The following information should be submitted where the assessment results indicate groundwater supplies may be present:

- a) A set of drawings demonstrating all groundwater abstractions are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved a conceptual site model should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

5. Flood risk

5.1 We reiterate that, as detailed above, our position and advice is based on the determining authority determining that the proposal is supported under Policy 22, as defined in NPF4, unless we are advised otherwise.

5.2 Advice on flood risk is available at [Flood Risk Standing Advice](#) and reference should also be made to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

- 5.3 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.
- 5.4 In order to establish that the five bullet points within NPF4 Policy 22a have been satisfied and where it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our [Technical Flood Risk Guidance for Stakeholders](#) provides generic requirements for undertaking Flood Risk Assessments as well as our [Climate change allowances for flood risk assessment in land use planning](#) guidance.
- 5.5 The FRA should specifically address the following issues:
- a) All existing watercourses and drains on the site are fully identified and flow pathways understood in relation to the 1 in 200 year plus climate change flood levels for the catchment.
 - b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.
 - c) Demonstration there is no increased flood risk to existing properties in the vicinity of the proposed development and, if possible, demonstrate an improvement.
 - d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.
 - e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.

- 5.6 Generally, we are unable to support landraising within a flood risk area unless it is required for development outlined under the exceptions in Policy 22a of NPF4. Which, as indicated above, we understand this proposal is unless notified otherwise, and as such we may be able to accept. However, where landraising is proposed within the flood risk area identified within the FRA, it should be linked to compensatory storage and demonstrated that there is no reduction in floodplain capacity, or increased risk for others. Notwithstanding this, any landraising must be shown to be minimised as far as possible.
- 5.7 Culverting for land gain would not be supported by us. If any works to alter watercourse channels are proposed, we would expect betterment to the channel and utilisation of this opportunity to help reduce flood risk to the wider site and any other nearby receptors.
- 6. Environmental enhancements**
- 6.1 Policy 3 of NPF4 requires all EIA development to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. EIA development should fully mitigate potential negative effects prior to identifying biodiversity enhancements, with the enhancements provided in addition to mitigation. We have published a data set which identifies where riparian planting would be most beneficial. This is available via the data publication page at sepa.org.uk/environment/environmental-data/. We highlight there may be opportunities for riparian planting along watercourses within landownership boundaries and would welcome the exploration of such planting as part of any biodiversity net gain proposals.
- 7. Forest removal and forest waste**
- 7.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in substantial amounts of waste material and a peak in release of nutrients which can affect local water quality.

- 7.2 The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#) and our guidance [Management of Forestry Waste](#).

8. Pollution prevention and environmental management

- 8.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the [Guidance for Pollution Prevention](#) (GPPs), along with our sepa.org.uk/regulations/water/construction/ and sepa.org.uk/regulations/water/pollution-control/water-run-off-from-construction-sites/ webpages, for more information and advice.
- 8.2 A commitment must also be included in the schedule of mitigation that micro-siting will not encroach into sensitive areas, to avoid adversely affecting mitigation measures identified in the EIAR that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).

9. Life extension, repowering and decommissioning

- 9.1 The discarding of materials as waste should be avoided and the [waste hierarchy](#) applied to waste produced during construction, operation and decommissioning of the development. If there is an intention to discard materials then further guidance on this can be found in [Is it waste - Understanding the definition of waste](#), and our sepa.org.uk/regulations/waste/ and sepa.org.uk/regulations/waste/guidance/ webpages.

10. Other planning matters

- 10.1 For all other planning matters, we refer you and the developer to the relevant standing advice in our [Triage guidance and standing advice](#), which is also applicable to Electricity Act applications.

11. SEPA authorisation

- 11.1 We authorise several matters relating to water, waste management, radioactive substances, and pollution prevention and control. In 2018, the Scottish Government brought in the Environmental Authorisations (Scotland) Regulations 2018 (EASR 2018). The aim of these Regulations is to provide a standardised, simplified, common framework for environmental authorisations in Scotland, known as an Integrated Authorisation Framework (IAF). A copy of the draft Environmental Authorisations (Scotland) Amendment Regulations 2025 can be found at legislation.gov.uk/sdsi/2025/9780111062319/introduction.
- 11.2 The IAF is being developed in a phased manner during 2025, with the regulations applying initially to radioactive substances activities in early 2025. For further information on the amendment of the regulations please refer to our sepa.org.uk/regulations/how-we-regulate/environmental-authorisations-scotland-regulations-2018/ webpage.
- 11.3 It is an applicant's responsibility to ensure their proposals will meet all relevant regulatory requirements and they are working within regulatory guidelines. We prefer all the technical information required for any SEPA authorisations to be submitted at the same time as the planning or similar application. We consider it to be at the applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.
- 11.4 Our sepa.org.uk/regulations/ webpage provides good practice advice and guidance and defines those activities which may require authorisation by SEPA, along with details of how to contact us for more help, advice and how to apply for any necessary authorisations.

Appendix 2: SEPA's additional EIA scoping requirements by type of development

The below advice should be read in conjunction with the scoping advice in [Appendix 1](#) above.

1. Windfarm

- 1.1 Proposals for life extension, repowering and/or decommissioning of windfarms must demonstrate accordance with our guidance on the [Life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.

Katie Butchart

From: #ABZ Safeguarding <abzsafeguard@aiaairport.com>
Sent: 20 June 2025 10:53
To: Econsents Admin
Subject: RE: Request for Scoping Opinion Ravengill Energy Park

This proposal is located outwith the consultation area for Aberdeen Airport. As such we have no comment to make and need not be consulted further.

Kind regards
 Kirsteen



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 www.aberdeenaairport.com
 Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

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

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Dear Consultee,

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

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

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

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

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

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

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

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

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

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

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

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

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



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Patron His Majesty The King

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

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Bringing Horses and People Together

A44

The
British
Horse
Society

A45

semi-rural areas, and areas of high horse ownership. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) - but they often have few other places to ride or no other way to access their safe off-road riding.

Vehicles travelling to and from the site are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our "Guidance to drivers of large vehicles" document.

The Horse and the Rural Economy

Scotland's equestrian industry is worth over £300 million to the Scottish economy annually. This figure excludes the value of the horse racing industry, which is worth a further £300 million. Equestrianism is therefore an important part of the rural economy, especially in areas of high horse ownership. Recent joint research between SRUC and The BHS showed current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society, leading to growth in the sector.

A national survey of riders who had recently given up their horse found that 27% of them had done so because they had lost access and had nowhere to ride. Failing to accommodate horses on our local path networks may lead to riders being forced to give up their horses, which in turn may damage the local economy.

I trust that the above information is of assistance. If you have any questions or would like to discuss the needs of equestrians further, please do contact me.

Kind regards,

Elizabeth Birtley
Access Team Manager
British Horse Society

access@bhs.org.uk
02476 840515

By email:

23 June 2025

Dear Sir/Madam,

Re: Request for scoping opinion on Ravengill Energy Park - ECU00006172

Thank you for the opportunity to respond to this request for scoping opinion. The British Horse Society (BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles and is the largest and most influential equestrian charity in the UK. The BHS is committed to protecting and promoting the interests of all horses and the people who care for them through our work in education, welfare, safety and access.

Outdoor Access

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing energy infrastructure. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.

The creation and upgrading of paths and tracks within developments can be an opportunity to improve outdoor access and provide the local community with additional amenity, especially if consideration is given to laying out tracks to provide circular loops. To achieve this outcome, when completed, paths and tracks should be suitable for all users. Unconsolidated sharp stone is likely to injure horses so tracks should be finished with a layer of consolidated whin dust. Obstructions to access like locked gates or deer grids with no side gate should be avoided.

The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.

The Importance of Off-Road Riding

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences.

Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and

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From: radio@bt.com
To: radio@bt.com
Cc: radio@bt.com
Subject: RE: WID13881 - Due by 1st July 2025 - Request for Scoping Opinion Ravensgill Energy Park
Date: 18 June 2025 15:41:05
Attachments: [image003.png](#)
[image005.png](#)
[Ravensgill_EIA_Scoping_Report.pdf](#)



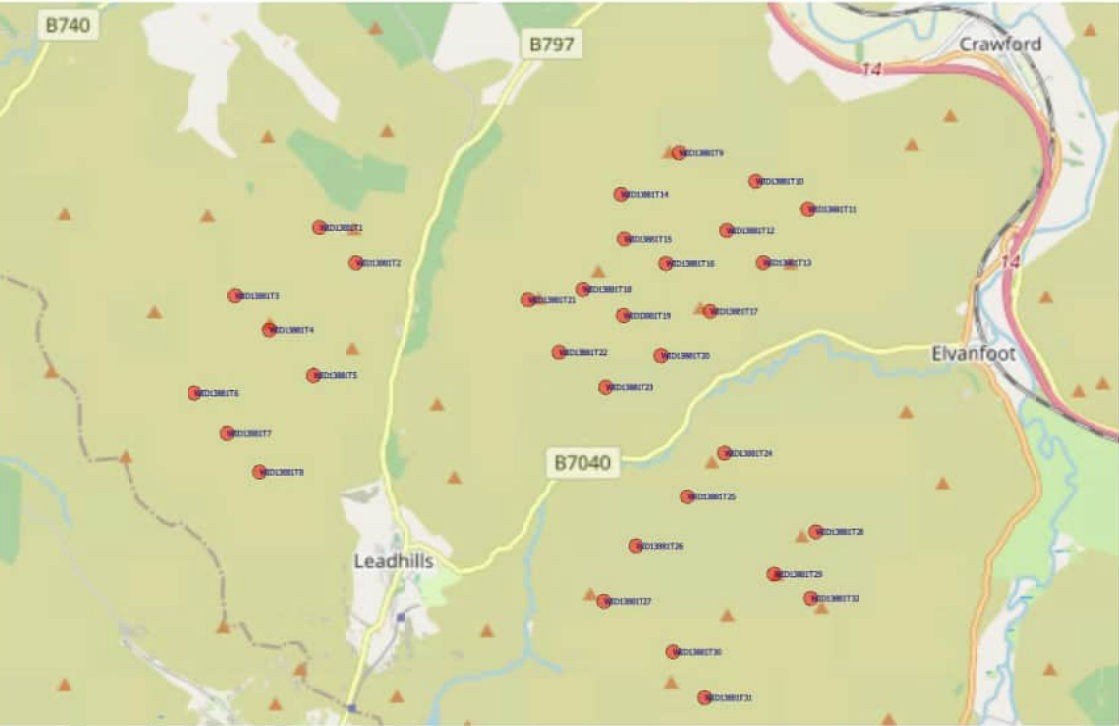
OUR REF: WID13881

We have studied this proposal using the attached with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that this proposal should not cause interference to BT's current and presently planned radio network.

BT requires 100m minimum clearance from any structure at height to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any further changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.



Kind Regards

Lisa Smith
National Radio Planner
Radio & Satellite Platforms



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Defence
Infrastructure
Organisation

Wendy Talbot
Ministry of Defence
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WS14 9PY

Your Reference: ECU00006172

E-mail: DIO-safeguarding-statutory@mod.gov.uk

Our Reference: DIO10067718

Niall MacQuarrie
Energy Consents Unit
Scottish Government

By e:mail

16 July 2025

Dear Niall

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

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
Ravensgill Energy Park.**

Thank you for consulting the Ministry of Defence (MOD) in relation to the scoping opinion request for Ravensgill Energy Park through your communication dated 10 June 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that the MOD has concerns with the proposal.

The proposal concerns a development of 32 turbines each with maximum blade tip heights of 220 metres above ground level and a battery energy storage system. The proposed development has been assessed using the location data (Grid References) below provided in "Ravensgill Energy Park EIA Scoping Report, Version 3" dated 3 June 2025.

Turbine no.	Easting	Northing
1	287818	618876
2	288227	618468
3	286849	618133
4	287226	617738
5	287709	617214
6	286364	617049
7	286722	616588

8	287073	616142
9	291906	619614
10	292761	619274
11	293346	618944
12	292418	618728
13	292825	618355
14	291231	619163
15	291257	618660
16	291728	618374
17	292208	617823
18	290781	618106
19	291226	617800
20	291648	617338
21	290157	618004
22	290494	617403
23	291010	616998
24	292331	616223
25	291904	615736
26	291300	615191
27	290928	614577
28	293345	615301
29	292862	614836
30	291699	613988
31	292040	613466
32	293271	614553

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to the impact of the development on the Eskdalemuir Seismological Recording Station and the potential for the turbines to create a physical obstruction to air traffic movements.

Eskdalemuir Seismological Recording Station

The development site identified falls within the statutory consultation zone associated with the seismological recording station at Eskdalemuir (the array), an asset that forms part of the UK contribution to the Comprehensive Nuclear Test Ban Treaty.

Research has confirmed that wind turbines of current design generate seismic noise which can interfere with the operational functionality 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 finite seismic noise capacity for the 50km radius surrounding the array, based on the findings of research, is managed by the MOD.

At this time, there is no seismic noise capacity available. The MOD must, therefore, make you aware that we will likely object to proposals for wind energy development in this location due to the unacceptable impact the proposed wind energy development would have on the operation and capability of the array.

Physical Obstruction

The application site falls within Tactical Training Area 20 (TTA 20T), an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

If the developer is able to overcome the Eskdalemuir impact stated above, to address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

Summary

The MOD has concerns with this proposal due to the potential impact it will have on the Eskdalemuir Seismological Recording Station and the potential to create a physical obstruction to air traffic movements.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Ravengill Energy Park EIA Scoping Report, Version 3" dated 3 June 2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely

REDACT

Wendy Talbot
Assistant Safeguarding Manager
DIO Safeguarding

Katie Butchart

From: Safe Guarding <safeguarding@edinburghairport.com>
Sent: 02 July 2025 08:41
To: Econsents Admin
Cc: Safe Guarding
Subject: ECU00006172 - Ravensgill Energy Park

Good morning,

The proposed development has been fully examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria.

We therefore have no objection to this proposal.

With best regards,
 Claire

Claire Brown
 Aerodrome Safeguarding & Compliance Officer



Our values

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FAO Niall MacQuarrie
 Energy Consents Unit
 By Email

27th June 2025

Dear Niall

Request for Scoping Opinion Ravensgill Energy Park
Our reference: GLA4631

I refer to your request for scoping opinion received in this office on 10th June 2025.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The site is outwith the obstacle limitation surfaces and radar consultation area for Glasgow Airport;
- It is within the instrument flight procedures safeguarding areas and may impact. Detailed assessments will be required.

Our position with regard to this proposal will only be confirmed once the turbine details are finalized and we have been consulted on a full planning application. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operational impact and cumulative effects.

Yours sincerely
 REDACT

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 Safeguarding Manager
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A52

By email only

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

11 June 2025

Dear Niall

Glasgow Prestwick Airport

ELECTRICITY ACT 1989

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

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

Glasgow Prestwick Airport Ltd ("GPA", "the Airport") is supporting the Scottish and UK Governments' drive to release 20GW of renewable energy projects by 2030, working to facilitate over 4GW of potential wind power within a 45 nautical mile radius of the aerodrome. We continue to be actively engaged with numerous developers to address aviation safeguarding issues, including the resolution of infringements to published instrument flight procedures associated with The Airport.

We have reviewed the documents available on the ECU planning portal for the Ravengill Energy Park (**ECU00006172**) and respond to the scoping consultation on aviation matters only.

Glasgow Prestwick Airport Ltd
Aviation House, Prestwick, Ayrshire, Scotland, KA9 2PL

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The Airport's Windfarm Safeguarding Assessment Process

1. In aviation, safety in the air is paramount. That being the case, the Airport has considered the planning application in line with its Windfarm Safeguarding Assessment Process. The steps of that process are undertaken to ensure the Airport meets the requirements imposed upon it through the Civil Aviation Publications (CAPs) which are promulgated by the Airport's regulator, the Civil Aviation Authority (CAA).

The Airport's Initial Safeguarding Assessment

2. The Initial Safeguarding Assessment confirms that the proposed development lies outwith the lateral limits of Glasgow Prestwick Airport's Controlled Airspace (CAS), however it is in an area where the Airport's ATC regularly provide an air traffic control service as part of the approach to Runway 30.
3. Other issues identified in the assessment include:
 - i. Potential disruption to Instrument Flight Procedures and minimum safe altitudes due to the site's location and proximity to GPAs controlled airspace, in particular the satellite based Instrument Flight Procedures for Runway 30.

Primary Surveillance Radar (PSR)

1. Preliminary Radar Line of Sight ("RLoS") analysis at the maximum turbine tip heights of 220m for the proposed Ravengill Energy Park indicates that there is no likelihood that the proposed turbines may be visible to the Airport's primary radar.

Glasgow Prestwick Airport Ltd
Aviation House, Prestwick, Ayrshire, Scotland, KA9 2PL

T: +44 (0)1292 511038 E: ihutchinson@glasgowprestwick.com
www.glasgowprestwick.com safeguarding@glasgowprestwick.com

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Instrument Flight Procedures (IFPs)

2. Given the proposed maximum tip height (220m) of the turbines and an approximate height above sea level of 848m (2782ft), there is the potential for infringement of multiple IFPs and their associated safety buffers. The Terminal Arrival Altitude (TAA) is a safety level which allows aircraft undertaking a satellite based navigation (RNP) Approach to the Airport to do so safely. The TAA in the area above the site is currently set at 3800ft AMSL, making the maximum height for any proposed turbines 2800ft AMSL to avoid infringing the procedure. At an estimated height of 2782ft AMSL, the tallest turbine at Ravensgill Energy Park would be within the margin of error for the purposes of IFP infringements.

However, there is currently work underway to increase the TAA level in this area to 3900ft AMSL associated with the consented Sanquhar II Wind Farm. With this in mind, and subject to CAA IFP regulatory approval of the change, this would remove the requirement for an IFP Assessment and allow the Airport to remove its holding objection subject to all turbines remaining below 2900ft AMSL, which would require confirmation from the Developer regarding accurate elevations at design freeze. Should the Developer wish to remove all IFP infringement risks, then a level not above 2799ft AMSL would allow the Airport to remove its objection without any further caveats

Ravensgill Energy Park Scoping Report

3. In response to the Aviation section commencing at Section 3.10 of the Ravensgill Energy Park Scoping Report, the Airport wishes to commence a dialogue with the Developer to undertake the following aviation safeguarding assessments.
 - i. Confirmation from the Developer on the required micro-siting and maximum elevation above mean sea level within that micro-siting to determine the need for an IFP Assessment.
 - ii. An IFP assessment against the Airport's published flight procedures (both RNAV/RNP and conventional); In this case, given the location of the proposed development, we would recommend a Stage 1 Assessment, which gives a 'Yes/No' result to the question

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of whether any IFP infringements are present. The findings of any Developer provided IFP reports would need to be verified by our contracted IFP Safeguarding provider.

Conclusions

4. This development raises aviation safety concerns, and would have a potential operational impact on the Airport as an Air Navigation Services Provider (ANSP).
5. Consequently, the Airport would lodge an initial **holding objection** to this development should it proceed to a full Section 36 application, until such time as the aviation safety issues are fully examined, defined, and resolved to both the Developer and the Airport's satisfaction.
6. We believe that the confirmation of the elevations upon which the turbines will be constructed followed by commission of a formal Instrument Flight Procedures Assessment (if necessary) could provide a positive result that would allow the Airport to remove this holding objection quickly.

Yours faithfully

REDACT

Ian Hutchinson
Aerodrome Safeguarding Manager
For and on behalf of Glasgow Prestwick Airport Limited

Glasgow Prestwick Airport Ltd
Aviation House, Prestwick, Ayrshire, Scotland, KA9 2PL

T: +44 (0)1292 511038 E: ihutchinson@glasgowprestwick.com
www.glasgowprestwick.com safeguarding@glasgowprestwick.com

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From: [LUP enquiries](#)
To: [Niall Macquarrie](#)
Cc: [Econsents Admin](#)
Subject: Request for Scoping Opinion Ravengill Energy Park - ECU 00006172
Date: 13 June 2025 13:19:30
Attachments: [image005.png](#)

Dear Mr Macquarrie,

Thank you for your request to HSE's Chemical Explosives and Microbiological Hazards Division for comments on the Environmental Impact Assessment for Lees Hill Renewable Energy Park in the Scottish Borders (reference ECU00004571).

A.Application under section 36 of the Electricity Act 1989

Regarding the application under section 36 of the Electricity Act 1989, it is our understanding that while the 1989 Act includes a provision for HSE to be consulted on relevant electrical safety issues, this does not apply to consent applications submitted under Section 36 of the Act. Therefore HSE's Chemical Explosives and Microbiological Hazards Division has no comments to make on the consent application under section 36 of the Electricity Act 1989.

B.Environmental Impact Assessment report

HSE's Land Use Planning advice team is responding under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, Regulation 4(4) – the vulnerability of the proposed development to major accidents relevant to the development

- HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.
- HSE is not responding in our regulatory role in the health and safety system

1.The proposed development does not appear to be of a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.

2. The development is not located within a safeguarding zone of an explosives site licensed under the Explosives Regulations 2014 or the Dangerous Goods in Harbour Area Regulations 2016.

3. The development is not located within HSE's land-use-planning consultation zones for hazardous substances consented sites.

4. The development crosses the land-use-planning consultation zones for three major accident hazard pipelines:
 - the 11 Feeder Bathgate-Moffat natural gas pipeline (ref 7923_2180) operated by National Grid Gas PLC
 - the 12 Feeder Bathgate-Moffat natural gas pipeline (ref 7921_2178) operated by National Grid Gas PLC
 - the NWEF Grangemouth-Stanlow ethylene pipeline (ref 7129) operated by Essar Oil UK Ltd

There is potential to initiate a major accident at the major accident hazard pipeline, for example during the development construction phase and potentially the operational phase, because the

development area intersects the route of the major accident hazard pipeline. We understand that the UK Onshore Pipeline Operators Association has produced guidance at <https://www.ukopa.co.uk/published-documents/good-practice-guides/> including:

- UKOPA/GP/013 Requirements for the Siting and Installation of Wind Turbines Installations in the Vicinity of Buried Pipelines
- UKOPA/GP/014 Edition 2 Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines

HSE suggests that the EIA should show that the operator of the pipeline has been consulted and that these issues have been considered in the assessment:

- the development restricted area due to the pipeline
- ensuring the integrity of the pipeline and protecting the pipeline from development and operational works.

We hope that this takes your assessment of the application forward.

Yours sincerely

Richard Lomax

Land Use Planning Advice team - Chemicals Explosives Microbiological Hazards Division 5B



Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

02030283092

Please send enquiries on Land Use Planning to lupenquiries@hse.gov.uk and enquiries on hazardous substance consents to HazSubCon@hse.gov.uk

HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>

From: HazSubConsent CEMHD5 <HazSubCon.CEMHD5@hse.gov.uk>

Sent: 11 June 2025 07:22

To: LUP enquiries <LUPenquiries@hse.gov.uk>

Subject: FW: Request for Scoping Opinion Ravengill Energy Park

From: Niall.Macquarrie@gov.scot <Niall.Macquarrie@gov.scot> **On Behalf Of** Econsents_Admin@gov.scot

Sent: 10 June 2025 10:45

Subject: Request for Scoping Opinion Ravengill Energy Park

Dear Consultee,

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

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36

APPLICATION FOR Ravengill Energy Park

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

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

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

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report.

Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

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

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

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

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

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

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

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



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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhwch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

Katie Butchart

From: Safeguarding <Safeguarding@hial.co.uk>
Sent: 30 June 2025 09:00
To: Econsents Admin
Cc: Safeguarding
Subject: RE: Request for Scoping Opinion Ravengill Energy Park

OFFICIAL

Your Ref: ECU00006172
 Our Ref: 2025/139/CAL

Dear Sir/Madam,

Proposal: ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR Ravengill Energy Park

This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.

Kind regards,

Nyree

**Our Values**

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

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Consultee,

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

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

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

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

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

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

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

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

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

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

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



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Katie Butchart

From: Joint Radio Company <wftracker@jrc.co.uk>
Sent: 20 June 2025 09:02
To: Econsents Admin
Cc: windspen@jrc.co.uk
Subject: Re: Ravengill Energy Park ECU00006172 - Request for Scoping Opinion

Dear Sir/Madam,

Planning Ref: **ECU00006172**

Name/Location: **Ravengill Energy Park**

Site Centre/Turbine at NGR:

1	287818	618876
2	288227	618468
3	286849	618133
4	287226	617738
5	287709	617214
6	286364	617049
7	286722	616588
8	287073	616142
9	291906	619614
10	292761	619274
11	293346	618944
12	292418	618728
13	292825	618355
14	291231	619163
15	291257	618660
16	291728	618374
17	292208	617823
18	290781	618106
19	291226	617800
20	291648	617338
21	290157	618004
22	290494	617403
23	291010	616998
24	292331	616223
25	291904	615736
26	291300	615191
27	290928	614577
28	293345	615301
29	292862	614836
30	291699	613988
31	292040	613466
32	293271	614553

Development Radius: 0.1km

Hub Height: 135m Rotor Radius: 85m

JRC analyses proposals for wind energy developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

The Energy Industry considers that any wind energy development within:

- * 1000m of a link operating below 1GHz; or
- * 500m of a link operating above 1GHz, requires detailed coordination.

For turbines with a blade diameter of 32m or less this distance is reduced to:

- * 500m for links below 1GHz; and
- * 300m for links above 1GHz before a detailed coordination is required.

There is an EXCLUSION ZONE around most Base Station sites of 500m, i.e. no development is permitted. This will be evaluated on a case by case basis for smaller turbines.

Unfortunately, part (or all) of the proposed development breaches one or more of these limits.

The affected links are:

460MHz Telemetry and Telecontrol:

JESPVS1 to JESPVO4

>1GHz Microwave Point to Point:

Scottish Power Energy Networks (Sco 1018453/1

Operated by:

Therefore JRC OBJECTS TO THE PROPOSED DEVELOPMENT.

Unfortunately, since these links form part of our critical national infrastructure, no details apart from the link identifiers can now be supplied, due to previous breaches in confidentiality.

However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email.

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

NOTE:

The protection criteria determined for Energy Industry radio systems can be found at [Wind Farm Coordination | Joint Radio Company | JRC](#)

Regards

Wind Farm Team

Friars House

Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC | Joint Radio Company | JRC](#)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact anita.lad@jrc.co.uk.

On Tue, 10 Jun at 5:45 AM , econsents_admin <econsents_admin@gov.scot> wrote:
Dear Consultee,

ELECTRICITY ACT 1989

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

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

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

Regards,

Niall MacQuarrie | Case Officer | Energy Consents Unit

The Scottish Government | email address

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



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LEADHILLS COMMUNITY COUNCIL

Response to Ravengill Energy Park Scoping Report.

ECU REFERENCE: ECU00006172

1. INTRODUCTION.

This report is a response by Leadhills Community Council to an invitation by the Energy Consents Unit to respond to a scoping request by Ravengill Energy Park Ltd for comments relating to a potential development under s.36 of the Electricity Act 1989 at a site to the north of Leadhills, a village in South Lanarkshire. This response is being made under the terms of Regulation 12 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations').

The proposed development site is anticipated to accommodate approximately 32 wind turbine generators with a maximum tip height of 220 m and with a generation capacity of greater than 50 Megawatts (MW). In addition, it is proposed that the site will accommodate a battery energy storage system (BESS) of approximately 50 MW capacity. The anticipated location of the BESS is not shown in the Scoping Report.

This Scoping Response follows the format of topics set out in the scoping document provided by the Energy Consents Unit of the Scottish Government. Where, at the end of core EIA topics, questions have been posed for respondents to answer, the reference numbers are given after the response.

It is noted that the proposed development is of a type listed in Schedule 2 of the EIA Regulations (item (1) "a generating station"); and on the basis that *"the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location"* It is further noted that the applicant in this case has volunteered to undertake an EIA rather than request a formal screening opinion.

Public Consultation.

In relation to public consultation, Renewco Power Ltd initially outlined their proposals at an ad hoc presentation following a meeting of Leadhills Community Council on 13 June 2024. At this meeting the Council members and the public present made it clear that, in their view, the company's proposals would be unwelcome.

Renewco Power Ltd, the parent company of Ravengill Energy Park Ltd, presented their proposals at formal exhibition and explanation events held by the company at Leadhills Village Hall and Crawfordjohn Community Centre on 20th and 21st May 2025. The Leadhills exhibition was well attended with 75 people attending and 30+ feedback forms submitted. Unfortunately at the Leadhills meeting there were a

couple of technical glitches relating to the power supply and lack of internet connectivity. Although the former was resolved, the lack of internet provision meant that visualisations showing the likely impact of the proposals from residents' houses was not possible. This constrained some peoples' understanding of the proposals.

Following this opportunity for the residents of Leadhills to scrutinise Renewco's proposals and their likely impact, Leadhills Community Council undertook a community consultation process culminating in a household ballot. The 197 occupied dwellings and holiday homes within the community were balloted with 105 responses being received. The ballot form enabled all people aged 16 or over to vote to support or oppose the windfarm element of the proposed Ravengill Energy Park. 199 people responded to the questionnaire options. Of these 183 (92%) opposed the proposed windfarm and 13 (7%) supported it. There were 3 people who were without a view either way. The results of the ballot showed conclusively that the residents of Leadhills are clearly and overwhelmingly opposed to the proposed Ravengill Energy Park development.

The results of the ballot were reported, discussed and approved at a special meeting of the Leadhills Community Council on 10 July 2025. The Community Council unreservedly support the majority of residents who expressed opposition to the proposed development and will formally object to the proposed s.36 application when it is lodged.

Given the strength of feeling within the community, it is impossible for the Community Council to see how any significant alterations or mitigations could be made which would make the proposals acceptable to the community since, in our view, the scale of the proposals would severely adversely impact the village and the surrounding environment.

Even though the Community Council opposes the scheme, we thought it would be important to maintain a dialogue with the developers and to this end we suggested that a Community Liaison Group be established: a suggestion which was taken up by Renewco.

The Community Council would request that the response of the community to the consultation process be accurately reported within the Pre-Application Consultation Report which will accompany the eventual application, as stated in section 3.2 Of the Scoping Report.

2. DESCRIPTION OF THE PROPOSED DEVELOPMENT

Community Benefits.

The Community Council welcomes the commitment of Renewco to establishing a Community Benefit Fund. It is considered that such a fund should be innovative and flexible in its scope. Historically, Community Benefit payments have been set at £5k per installed MW capacity. Given the efficiency and larger sizes of turbines now being erected on sites, coupled with economies of scale and the high payments being made to electricity generators, it is considered that the £5k figure per MW generated is no longer appropriate. The closeness of the grid connection to the Ravengill site will further reduce the capital connection costs. Furthermore, the BESS would improve the efficiency of the generating and distribution characteristics of the site. It has been noted that, in some recent s.36 consents, developers have agreed to contribute £7.5k per installed MW. It is considered that this level of Community Benefit payments would be appropriate, should consent be given, particularly given that the proposed scheme, if consented, would have a profound impact on Leadhills and its setting.

The commitment to establish such a fund should be included in any agreement to sell, or otherwise transfer, Ravengill Energy Park Ltd/ Renewco Power Ltd's interests in the proposed development to a third party, should consent be given.

3. SCOPE OF THE EIA

In Table 3.1 the applicant proposes to "scope out" a number of topics. Further details of the elements which the developer proposes to scope out are given in section 4. The Community Council cannot agree that the following topics are scoped out: Population and Human Health; Air Quality and Shadow Flicker. Our reasonings are given in our response to section 4.

Landscape and Visual Amenity.

In the introduction to the Scoping Report or in the sections on Landscape and Visual Amenity or Cultural Heritage there is no reference to the previous s.36 application on the central area of the site. An application (The Harryburn Windfarm) was an application underpinned by RWE Innogy Ltd to construct 17 turbines each 149.9 metres tip height to ground level. This application (ECU reference EC00005277) was refused consent by the Scottish Ministers on 27 September 20019 following a Local Public Inquiry. The findings of the two Reporters and the conclusion of the

Scottish Government regarding the scheme are considered by Leadhills Community Council to be material factors relevant to the current application.

The Reporters' and Scottish Government's opinion was that the proposed benefits of the Harryburn Wind farm were outweighed by its considerable landscape impacts, which would lead to an unacceptable loss of character and regional distinctiveness of the Lowther Hills; that the scheme would conflict with specific local plan policies and that harm would be caused to Leadhills Conservation Area and cultural assets.

The regional distinctiveness of the landscape of the Lowther Hills was further supported by the Scottish Government Ministers' rejection of a s.36 application by North Lowther Energy Initiative Ltd (ECU ref: 00000426) to erect 30 turbines each having a ground to blade tip height of 149 metres on 8 January 2021. This development was proposed for a major site between Wanlockhead and Sanquhar in Dumfries and Galloway, to the west of the current application site. This decision was challenged at Judicial Review and by an action at the Court of Session, both of which upheld the robustness of the Reporters' findings and the Ministers' decision.

There is no mention of the previous scheme and the conclusions of the Reporters and the Scottish Government in either the Introduction to the Scoping Report or in the section on Landscape. There is similarly no mention of the decision on the North Lowther Energy Initiative proposal. Both of these decisions are highly relevant and should be reported in the eventual Ravengill application as part of the background.

By not including the previous relevant decisions the applicant is in effect "scoping out" this information from the EIA process. These decisions, and the ongoing factors on which these decisions were made, are material considerations and should be included in the eventual application.

Relating to table 3.3.1, the Community Council has a number of comments relating to viewpoints. Given the extensive nature of the proposed windfarm, we consider that the number of viewpoints identified are insufficient to adequately reflect the impact which Leadhills residents will experience. Similarly, visual receptors using the approach roads to and from Leadhills will experience sequential views over considerable distances. In view of these comments we would suggest that the following viewpoints be added to the list:-

Viewpoint at Leadhills

- Leadhills Football pitch: Grid ref. 288850 614840.

This visualisation have been suggested because it shows the proposed turbines surrounding the village, without views being unduly impaired by buildings and trees.

Viewpoint on the B797.

- Cattle grid at Glengonnar on the B797. Grid ref. 288002 613450.

It is recommended that this location is selected as a viewpoint. It was described at the Harryburn Inquiry as a key viewpoint showing the setting of Leadhills.

Viewpoints on the B7040.

- Former railway level crossing site. Grid ref. 293400 617622

This location gives a panoramic view of the proposed development along the B7040 to the west.

- Location on B7040 near Risping Cleuch. Grid ref. 290350 615800

This location gives a panoramic view of the proposed development along the B7040 to the east.

A number of existing tracks within the windfarm site, particularly within the western and central sections, are popular with walkers, since these provide easy routes to access the hills. Because of their relatively recent construction many of these are not shown on OS sheets. They are, however, clearly visible on Google Earth. It is thus suggested that a viewpoint is selected on the track within the central area of the site to reflect the impact of the proposals on these recreational receptors. It is suggested that a point is selected in the vicinity of Coom Dod at Grid Ref: 29100 618300. (LVIA3)

In paragraph 3.3.2 of the Scoping Report it is proposed that the impact of aviation lights should be limited to 20 km. Experience of the aviation lights at Kennoxhead Windfarm and their impact on Wanlockhead suggests that a more precautionary approach should be adopted with the visual impact zone being extended to 25 or 30km. This is particularly the case given the height and orientation of much of the proposed application site with long distance visibility of turbines as shown in the visualisation on figure 3.3.2. (LVIA4)

Similarly, given that turbine heights have significantly increased during the last few years, there might also be merit in extending the impact zone for cumulative effects from 25 to 30 km. (LVIA6)

Cultural Heritage.

The Community Council would question the assertion in paragraph 3.4.3 whether the Conservation Area at Leadhills has a heritage value merely a regional level and medium sensitivity. The Reporters at the Harryburn Inquiry placed great store on the

setting of Leadhills Conservation Area which, in their view, contributed to its significance. (Paras 4.70 & 4.71). In para 4.72 they concluded that *"There is no justification in the additional information for attributing medium significance to Leadhills"* (Conservation Area.) CH2

In relation to CH4 the Community Council is content with the visualisation points proposed.

Ecology.

In describing baseline conditions in para.3.5.3 of the report, in relation to designated sites, the statement that there are no designated sites within the site itself is not correct. Raven Gill SSSI is located within 300 metres of the proposed turbine located to the east of Ravengill trig point and was designated for its geological importance. It is noted that the SSSI is described in the section on Hydrology, Hydrogeology & Geology.

The section on designated sites in Table 3.5.2 will also need amending.

The likely disruption to the drainage characteristics of the proposed site, which are outlined in our response to Hydrology, Hydrogeology and Geology, could have implications for the Ground Water Dependant Terrestrial Ecosystems. These implications should be examined as part of the assessment process. (EC02)

The Community Council are aware of populations of brown trout in the Glengonnar Water and Elvan Water. Presumably brown trout will also exist in the lower sections of Snar Water and Glenochar Burn, both of which flow outwards from the proposed windfarm site. We would suggest that the statement in Table 3.5.2 that "impacts on resident fish during construction cannot be scoped out until the ecological baseline surveys are complete and the presence and distribution of species and suitable habitats in relation the planned infrastructure and activities are fully understood." be amended. We consider that, irrespective of the results of the baseline surveys, the impact of construction on resident fish populations should not be scoped out. We consider that the continued monitoring of the resident fish populations would be a good indication of water quality. (EC05)

The following mammals and amphibians, which are under threat, have been seen by local residents within or in close proximity to the Ravengill site. These are :

Otter (*Lutra lutra*)

Hedgehog (*Erinaceus europaeus*)

Water Vole (*Arvicola amphibius*)

Common Toad (*Bufo bufo*)

Palmate Newt (*Lissotriton helveticus*)

It is recommended that these species should be included in the Ecological Impact Assessment. (EC01)

Although they have been seen recently within the proposed windfarm site, local residents are particularly concerned at the decline in the population of Mountain Hares (*Lepus timidus*) within the Lowther Hills. They were thought to be reservoirs for sheep ticks which were perceived to be a host for the Luping III virus, which kill young grouse. Until comparatively recently, when enhanced levels of protection were introduced, gamekeepers sought to eradicate the Mountain Hare from the Leadhills Estate. Also, reduced snow cover during the winter has impacted on the ability of the Mountain Hares to blend into their surroundings, making them more vulnerable to predation. (EC01)

Mountain Hares are particularly vulnerable to disturbance (The clue is in the Latin name!) and the Community Council is concerned that should the Ravengill Windfarm be approved these iconic animals will disappear from the locality. It is thus recommended that the developer recognise this vulnerability in their Ecological Impact Assessment. (EC01)

It is noted that invertebrates are not considered in the Scoping Report. NatureScot is presumably the body to identify any rare species in the locality and assess any impact. Assessments could be sought from specific interest groups such as butterfly conservation bodies. (EC01)

Visual inspection reveals that there are areas where the peat soils have been eroded. In particular, the principle area of type 1 peat to the east of Wellgrain Dod (Grid ref. 290600 217900 is severely dissected and it is appropriate that a detailed Peat Condition Survey is carried out. (EC04)

Ornithology.

In relation to the designated Muirkirk and North Lowther Uplands SPA and the North Lowther Uplands SSSI, the Community Council find it difficult to agree with the assessment that there will be no connectivity between the protected area and the proposed Ravengill application site. It is our view that the Muirkirk and North Lowther SPA should not be scoped out. (OR3)

The Community Council considers that the connectivity assessment within the Scoping Report, between the SPA and the Ravengill site, is based purely on the foraging ranges of target species. Common sense suggests that there has to be interplay between the protected species within the SPA and the surrounding areas, particularly when young birds seek to establish new territories. Otherwise, the gene pool of species would become more restricted, thereby increasing the long term vulnerability of protected species.

The proposed Ravengill scheme will add to the ring of structures and man-made disturbance surrounding the SPA. The SPA is already getting squeezed from the north by the various Kennoxhead and Lethans windfarm developments and to the east by the Andershaw/Middle Muir developments. Furthermore, the proposed 400 KV overhead transmission line between Glenmuckloch and the proposed substation connection with the existing 400KV overhead line at Redmoss will further reduce the open nature of the existing habitats to the north of the SPA.

In terms of the species of birds listed in the survey results, there is no mention of skylarks. This red list species breeds within the proposed application site and is frequently seen by locals with its characteristic flight and song. (OR2)

Barnacle geese winter in the Solway. Given the geographical juxtaposition of Leadhills to the Solway coast it is likely that a proportion of these geese will overfly the Ravengill Windfarm Site. (OR2)

It is noted that the assessment of ornithological impacts will take into account published scientific literature in relation to birds and windfarms. When windfarm applications are being put together, significant efforts are made to understand the populations and characteristics of bird species living, breeding or passing through application sites. These are focussed on the aim of getting permission. Thereafter, resources are not focussed on the looking at the constructional and long-term operational impacts on bird populations. It would be helpful in assessing what would be the actual likely impact of schemes if follow-up studies were carried out at operational windfarms and the results compared with pre-application baseline data. To this end, it would be helpful to know the impact of the operation of existing windfarms located in comparable moorland habitats. (OR1)

In relation to potential bird strikes, the increased heights of modern turbines are likely to increase the vulnerability of certain species to bird strikes by turbine blades and their associated close pressure waves. It is noted that one of the golden eagles recently released in the Moffat Hills was killed by a turbine strike. In Leadhills we get large numbers of skeins of geese overflying the village, migrating to and from wintering feeding grounds on the Solway coast. In certain misty weather conditions these can get disorientated and the Community Council thinks that the large turbines proposed could provide a considerable hazard to migrating geese. (OR2)

The Community Council would suggest that the impact of aviation warning lighting should not be scoped out from the assessment process. Large groupings of aviation warning lights are a fairly recent phenomenon and we consider that such lights, associated with the proposed scheme, would be likely to have a capacity to cause significant disturbance on bird life. The Community Council would thus welcome the inclusion of scientific evidence in the eventual application evaluating the impact of such lighting. (OR4)

In relation to the limited number of breeding attempts of hen harriers and short-eared owls identified in the Scoping Report, it is likely that the number of hen harriers and short-eared owls within the potential windfarm site would be higher were it not for the shooting and poisoning of birds and the deliberate destruction of nests. There is a well-documented history of wildlife crime within the Leadhills Estate.

It is noted that Oyster catchers are not included in the list of species to be scoped in to the EIA Report. One of the local residents has been monitoring oyster catcher numbers in the area. During the last three years there has been a drastic fall in their numbers. This is consistent with this species' marked and ongoing decline within Scotland, the decline being driven by cumulative disruption across every stage of their life cycle. It is suggested therefore that this species should be included in the collection and analysis of baseline data for the site. (OR1)

Similarly, during the last few years, residents have noticed that calls of curlew are greatly reduced compared with previous years. The apparent local decline of this species is, at present, anecdotal and we await the results of the baseline data collection process. (OR1)

Hydrology, Hydrogeology and Geology.

It is noted that there is a geological SSSI within the site. Whilst it is accepted that the proposed windfarm works would not directly encroach into the designated area, there is an existing track close to the highest point of the Ravengill SSSI and it is likely that this will be upgraded to provide the principal access point to the turbines located within the central area of the proposed windfarm site. Because of the proximity of the track to the designated area NatureScot will need to be specifically notified of the proposed works and their likely impact. It is our view that the site will be particularly vulnerable to the Renewco's windfarm proposals. The proposed excavation works for turbine 9 would be located within 300 metres of the SSSI. This and the proposed work to the adjacent access track will have the capacity to create material which could be washed or carried by wind into the SSSI. The condition of the feature was favourable when surveyed in February 2007. (HYD1)

In the section on geology and soils, reference is made to the Mining Remediation Authority Map Viewer. This particular paragraph gives the impression that coal was mined together with other minerals. This is not the case since the geology of the Lowther Hills precludes the possibility of coal deposits existing in the locality. (HYD1)

In reference to the paragraph on mining risk assessment, we agree that the abandoned mine workings and associated infrastructure may represent potential sources of ground instability and soil and water contamination. (HYD1)

It is noted that much of the former ore-field in the central area, including the gold scours designated as a Historic Monument, have been excluded from the application

boundary. Some areas where mineral extraction has taken place do remain in the site, and these could be a source of contamination if disturbed. Whilst in many cases there is visible evidence of these workings, there may be workings which are not immediately obvious. All shafts and adits present potential hazards and in the locality there have been many examples locally of the capping of old shafts failing or of shallow workings collapsing. Historically many shafts were capped with timber, overlaid by fill material. In particular, inadequately capped shafts represent a considerable health and safety threat. Furthermore, many of the stopes (The underground areas along the mineral veins where concentrations of ore were extracted) comprise considerable voids and some of these may extend to close to the surface. For these reasons it is vital that any historical mine documents are examined and survey work carried out on site to seek to determine the extent of the workings. (HYD1)

It is suggested that, as part of the scoping investigations, relevant documents and plans in the Hopetoun records office should be consulted to seek to determine the extent of the workings and the risk factors associated with them. The British Geological Survey, the National Library for Scotland and the National Records of Scotland are also possible sources of plans of workings. (HYD1)

Many of the underground mine workings are flooded and this can cause the build-up of considerable water pressure. Over the years there have been a number of instances where the weight of water has forced blowouts from blocked adits. This, however, shouldn't be a problem on the higher areas of ground where the turbines would be located. (HYD1)

The shafts and adits, located to the west of Glengonnar Water in the area excluded from the potential application site, suggest that there is a strong possibility of underground workings extending under the locations of turbines 5,7 & 8. (HYD1)

The proposed Ravengill construction works should avoid former mine workings wherever possible. Mine workings, particularly spoil heaps, may contain significant concentrations of heavy metals. Whilst many heavy metal salts may have been leached from these deposits over the years, it is possible that disturbance could mobilise the movement of heavy metal particles. It is suggested that future disturbance of former mine workings be avoided, should the scheme proceed. (HYD1)

It is suggested that professional advice should be taken should any mine workings be disturbed by infrastructure works. Similarly, care should be taken in any development phase to ensure that significant quantities of additional water are not allowed to penetrate the underground workings and raise water levels therein. (HYD1)

The existing tracks, constructed to gain access to shooting butts and the formation of parking areas within the Leadhills Estate, give some idea of the impact which the

formation of roadways will have on the drainage characteristics of the surrounding moorlands. The locality is subject to heavy and prolonged rainfall. The rain gauge at Leadhills, which until recently was monitored every day, recorded up to 96 inches of rain per annum with up to 4 inches of rain falling on any particular day. The existing tracks and car parks on the Leadhills Estate accelerate the drainage of water from the peat and create rills, and in some cases scars, where the gradients of the roadway increase the energy of the water flows. It is suggested that an assessment of potential flow rates and their impact at watercourse crossings should not be solely left to the contractor but that some initial research be carried out to assess the effect of flow rates now and in the future. For these reasons the Community Council considers that these assessments should not be scoped out. (HYD2)

The impact of the historic processing of lead ores in the area may not be confined to the immediate smelt mill sites. Historically ore was smelted at various sites in and around Leadhills and Wanlockhead. The latest smelt site at Leadhills was a facility to the west of New Glendorch (Grid ref. 288600 617750.) It is understood that this was discontinued in the 19th century. However, the local smelting of lead and the extraction of silver continued at the Buccleuch Smelt Mill (Grid Ref: 285584 614355), down-stream from Wanlockhead until the 1930s. The highly toxic flue gasses from these smelt mills are likely to have created a fallout of heavy metal particles in the surrounding area, including the Ravengill site, relating to wind speed and wind direction. We would ask for a robust baseline analysis of the extent of lead and other heavy metal pollutants, (ie. arsenic, cadmium, mercury, copper chromium and zinc.) locked within peat and soils, given the historic smelting activity in the area. Airborne heavy metal particles may have been distributed widely across the landscape, including the proposed windfarm construction sites, during the smelting process. It is thus conjectured that building new roads or removing soil for construction purposes could remobilise lead and other contaminants back into the local environment. This could have a detrimental impact on watercourses and possibly local health. Evidence for the distribution of wind-blown lead contamination is given in a paper on the results of an examination of sediment cores taken at Toddle Moss an ombrotrophic mire within the proposed application site, close to the to the northern boundary of the eastern portion of the site at grid reference 29340 61710. It should be noted that the authors identify Toddle Moss as an ideal site for studying past records of metal pollutants, since the bog is rain fed only and receives inputs, solely from the atmosphere, via precipitation and dry fallout. (HYD1)

The publication details of this paper are:

Tim Mighall, Anttonio Martinez Cortizas and others. "Identifying evidence for past mining and metallurgy from a record of metal contamination preserved in ombrotrophic mire near Leadhills, SW Scotland, UK". Published 2014 The Holocene 1-12.

A number of reports and papers have been produced identifying high levels of heavy metal contaminants within, and in the vicinity of, the proposed application site. It is thus recommended that the following documents are considered by the applicant in the preparation of their Environmental Impact Assessment Report:-

The impacts of mining on the Glengonnar Water, Leadhills, South Lanarkshire: Scoping Study. The Coal Authority; 2001

John S Rieuwerts & Margaret E Farago. (1995) Lead Contamination in smelting and Mining environments and variations in chemical forms and biodiversity. Published in Chemical Specialisation and Bioavailability, 7.4' 113-123.

"Scottish Soil Resources - Current Status and Threats." Published by the Scottish Government September 2006.

"Inventory of Closed Mining Waste Facilities" by EnviroCentre Ltd & Pleydell Smithyman Published by the Scottish Government January 2015.

As well as these papers, a couple of publications relating to contamination are cited in the Community Council's response to the Scoping Report section on Population and Public Health.

It is suggested that a high resolution peat survey be carried out in advance of the draft design being formulated. This advance work would enable the initial design to avoid areas of deep peat. From local observations within the site it is noted that the largest area of category one peat is substantially dissected. It is therefore suggested that the outline peat management plan should include an outline of measures to prevent further erosion of peat, together with remedial works designed to restore the most prominent areas of peat. (HYD1) & (HYD3)

The proposed windfarm infrastructure will displace large volumes of peat, soil and rock. The Community Council welcome the commitment to the creation of a peat management plan in accordance with the SEPA guidance "Developments on Peatland" There should also be an outline plan showing how rock and mineral soils would be utilised. (HYD1) & (HYD3)

A detailed assessment of peat deposits would also help in determining the carbon balance for the site. (HYD1) & (HYD3)

Traffic and Transport.

It is noted that there are no proposed windfarm access points envisaged within 4 kms of the village and, other than potential traffic disruption on the approach roads from the North to Leadhills, the Community Council has no comments. (TT1)

Noise and Vibration.

The consideration of noise as an environmental factor in the EIA process is a technical process and as such the community would have to rely on the assessment of this issue by South Lanarkshire Council and any technical experts employed on their behalf.

What we can say, is that, as a remote rural community, we are subject to very low levels of background noise. Background sound sources tends to be from natural sources and comprise things such as the roar of the wind in a storm, the rattle of rain on window panes, the bleating of sheep or the cries of curlew or oyster catchers. The low volumes of traffic on the B797, particularly at night, mean there is very little traffic to disturb our peace. In certain weather conditions we can sometimes hear traffic on the M74 and trains on the west coast main line. Because of our low exposure to sound levels, we are likely to be particularly sensitive to noise generated by construction works and traffic and by the operation of turbines, should the proposed development be constructed. The topography within, and adjacent to, the proposed application site might have an impact on the noise profile of the development, depending on weather conditions. It could possibly amplify any turbine noise characteristics. (NV1)

The short section on page 63, relating to the sensitivity of receptors, identifies all residential properties as being considered to be of high sensitivity to noise. Whilst the construction of individual residences will mitigate the impact of noise on people within the properties, many people living their day to day lives spent a proportion of their time outside their properties. Those people engaged in recreational activities, such as dog walking in and around the village, will be likely to be disturbed by even low levels of turbine noise. (NV1)

The capacity of turbines to generate infrasound is an issue for the local population. It is perceived that low frequency sound could be a possible health issue. At even moderate volumes, infrasound is known to disrupt the human nervous system. Given the capacity of low frequency sound to carry considerable distances we would seek to be reassured by studies calculating the ultrasound profile from the proposed turbine operations, as would affect the village, in the event of the proposal going ahead. The Community Council notes the commitment on page 60 of the Scoping Report that the latest information on infrasound, low frequency noise, turbine blade swish and amplitude modulation will be considered in the Environmental Impact Assessment Report within the eventual application. For these reasons we consider that these topics should not be scoped out. (NV1)

Should consent be eventually given, the Community Council expect that, should the development exceed the control parameters defined in noise conditions imposed on the consent, then offending turbines or groups of turbines will be shut down either temporarily or permanently. (NV1)

In relation to decommissioning, it is stated within this report that concrete turbine foundations will be removed to a depth of one metre below ground level. This process is likely to generate considerable levels of noise.

Aviation.

The Community Council note the requirements for aviation warning lighting on the turbine hubs. The impact of these are considered elsewhere in this response.

There is no assessment in the Scoping Report on the impact of the proposals on the private airstrip located at Whitecleugh, Grid ref: 282900 620700.

4. TOPICS PROPOSED TO BE SCOPED OUT OF THE EIA PROCESS.

The Community Council has the following comments to make on the topics which the applicant proposes should be scoped out of the EIA process:-

Socio-Economics and Tourism.

It is noted that this topic will be the subject of a separate report within the eventual application and as such the Community Council is content that this topic should be scoped out of the EIA process.

Population and Human Health.

In its section on human health the Scoping Report states that no other sources or pathways for effects on human health have been identified, other than water supplies, noise, traffic and visual amenity. The Community Council would point out that there is overwhelming evidence that wind-blown and leached contaminants are a significant threat to human health in the area.

As mentioned in our response to the section on Hydrology, Hydrogeology and Geology, a number of reports and papers have been produced identifying high levels of heavy metal contaminants in the vicinity of the application site. As stated in our response to the section on Hydrology, Hydrogeology and Geology, Leadhills and Wanlockhead were identified, in a report by the Coal Authority, as the Scottish communities most impacted by heavy metal contaminants.

The level of heavy metal contaminants has historically been, and continues to be, an important health issue for local residents. In 1989 W. E. Moffat produced a report

which highlighted high levels of lead within the blood of Wanlockhead residents. (See Environmental Geochemistry and Health. 1989; 11(1): 3-9). These findings caused concern with the local health authorities. The local water supply for Leadhills and Wanlockhead, which contained lead contamination, was eventually replaced a few years ago. Historically, the water supply was also contaminated by Cryptosporidium, a rather unpleasant parasitic protozoa, which affected the health of local residents. Although repeated attempts were made to eliminate this organism from the locally sourced water supply, reinfection kept occurring. A new water supply eliminated this problem in the mains water distribution system. It may still be an issue for private supplies.

In July 2012 NSH Scotland, in conjunction with Health Protection Scotland, NHS Dumfries and Galloway NHS Lanarkshire, issued a response to a SEPA scoping document relating to metal contamination in the Glengonnar water. This report was an assessment of the implications of metal contamination of water sources around Leadhills and Wanlockhead. The report looked at the sources of the contamination to the water courses and explored other routes for contamination to affect humans, through ingestion, inhalation and direct contact with skin.

One of the conclusions of the report was that *"Given the limitations of the recent SEPA-commissioned investigation, and the limited historical data on the environmental contamination legacy from the historical lead mining operations, local residents will have their own views on whether further environmental investigations might be appropriate. Efforts should be made by SEPA and other agencies to capture such views and assess these in order to determine if there is a consensus on the desire for any further investigations."*

For the reasons stated above. Leadhills Community Council would suggest systematic sampling and analysis of vegetation and soil within the area, together with the contents of spoil heaps and settlement ponds, to establish baseline data. Where mine workings are disturbed or veins exposed as part of any works then it is suggested that these should be included in an ongoing programme of survey and analysis to ensure that minimal levels of toxic materials find their way into water courses or local ecosystems and to reassure the local population. As such, therefore, the Community Council strongly feels that Human Health should not be scoped out of the EIA process.

The possibilities of heavy metal contaminants being released in site investigations and in construction processes also have implications for the health and safety of personnel employed on the site. These potential risks should be considered within the Construction (Design and Management) Regulations.

It is recommended that the following documents be considered as part of the EIA process in relation to heavy metal pollution and public health:-