

Technical Appendix 1.1: Consultation Register

Pre-Scoping				
Consultee Name	Date	Topic	Consultee Comments	Response
Statutory				
ECU	04/02/2025	ECU Form - New Project Notification Form		
SLC	10/04/2025	EHO Consultation - Noise monitoring locations	No response received	N/A
Scoping				
Consultee Name	Date	Topic	Consultee Comments	Response
Scottish Government				
Energy Consents Unit (ECU)	10/09/2025	Consultation	Consultation on the scoping report was undertaken by the Scottish Ministers and commenced on 10 June 2025 and closed on 4 September 2025.	Noted.
			Unless otherwise stated, Scottish Ministers expect the EIA Report to include all matters raised in responses from the consultees and advisers and to consider in full all consultation responses received.	Noted. All matters raised, where appropriate, have been included within the EIA Report.
			No responses were received from: 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, 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 (WoSAS), Woodlands Trust. It is assumed that these consultees have no comment to make on the scoping report, however each would be consulted again when an application is submitted.	Noted.
			The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environments Impact Assessment) (Scotland) Regulations 2017 have been met.	Noted.
			The 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.	Noted. This Consultation Register has been included as Technical Appendix 1.1 (EIAR Volume 4) to the EIA Report and indicates where each matter raised in the Scoping Opinion has been addressed.
		Scope	Scottish Ministers are satisfied with the scope of the EIA as set out in Section 3 of the Scoping Report.	Noted.
		Proposed Development characteristics	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, battery storage) - components required for each generating station - minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage	Noted. Chapter 2: Proposed Development Description (EIAR Volume 2) includes a description of the key elements of the Proposed Development and the battery storage proposals have been included in the noise assessment.
		Further consultation	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.	Noted. Further consultation has been undertaken and referred to, where relevant, in sections below.
		Hydrology, Hydrogeology and Geology		
		PWS	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.	The locations of all PWS within the Site and within 250 m of the Site boundary have been confirmed via consultation with South Lanarkshire Council and where appropriate property owners. The PWS Assessment in the Harryburn application was also reviewed. The Proposed Development has been set out such that infrastructure shall be at a suitable buffer from private water supplies. A hydrology walkover survey has been completed which included visiting relevant PWS locations. Assessment of potential impacts, risks, and any mitigation which would be provided is included in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) and associated technical appendices (EIAR Volume 4).
		Fish	Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provides generic scoping guidelines for onshore wind farm and overhead line development https://www.gov.scot/publications/onshore-renewables-interactions/ 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.	Noted. The MD-SEDD guidelines have been followed and the MD-SEDD checklist has been included as Technical Appendix 6.8 (EIAR Volume 4) .
			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.	Assessment of potential impacts on SACs has been scoped out of the EIA, as there are no SACs located within 5 km of the Site (or within the relevant watercourse catchments). Further information in Chapter 6: Ecology (Volume 2 EIAR)
			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.	Noted. The MD-SEDD advice has been followed and a checklist included as Technical Appendix 6.8 (EIAR Volume 4) .
		Peat	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.	A PLHRA has been prepared and is included as Technical Appendix 8.7 (EIAR Volume 4) . The stated guidance has been taken into consideration.
		Peat	RSPB has made a request that Turbines 3 and 6 are relocated to avoid impacts on Class 1 peatlands.	All turbine locations have been refined in response to the Stage 2 peat survey data and habitats surveys, and turbines and other infratructure have been positioned to minimise impacts on these as far as possible. A Peatland Condition Assessment (see EIAR Volume 4, Technical Appendix 6.2, Annex D: Peatland Condition Assessment) has also been carried out. For further details of the design response to environmental constraints refer to Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) .

Groundwater Supply Source	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.	The Proposed Development design process has taken account of groundwater supply sources. Groundwater supply source locations in relation to the Proposed Development are referred to in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) and shown on accompanying figures.
LVIA/Heritage		
Viewpoints	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 require no additional visualisations for the EIAR	Noted.
	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.	These viewpoints have been considered and follow-up consultation on LVIA viewpoints has been undertaken with ScotWays to confirm the final list of viewpoints considered in the LVIA. For further information on the final viewpoint list refer to Chapter 4: Landscape and Visual (EIAR Volume 2) .
	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)	These viewpoints have been considered and follow-up consultation on LVIA viewpoints has been undertaken with Leadhills Community Council to confirm the final list of viewpoints considered in the LVIA. For further information on the final viewpoint list refer to Chapter 4: Landscape and Visual (EIAR Volume 2) .
	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	These viewpoints have been considered and follow-up consultation on heritage viewpoints has been undertaken with HES to confirm the final list of viewpoints considered in the cultural heritage assessment. Confirmation of the final heritage viewpoint list was received from HES on 5th December 2025 (as detailed below in the Post-Scoping section of this Technical Appendix).
	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.	These viewpoints have been considered and follow-up consultation on LVIA viewpoints has been undertaken with NatureScot to confirm the final list of viewpoints considered in the LVIA. For further information on the final viewpoint list refer to Chapter 4: Landscape and Visual (EIAR Volume 2) .
	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.	The proposed final lists of LVIA and heritage viewpoints have been shared with SLC, ScotWays, LCC, NS and HES. Confirmation of the final heritage viewpoint list was received from HES on 5th December 2025 (as detailed below in the Post-Scoping section of this Technical Appendix).
Night time lighting Assessment	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.	The night-time lighting assessment has been presented in Technical Appendix: 4.6 Aviation Lighting Assessment (EIAR Volume 4) . A selection of representative night time viewpoints has been agreed with South Lanarkshire Council, and representative visualisations are presented in Figures 4.18.1 to 4.36.6 within EIAR Volume 3b: Visualisations .
Scope of heritage assessment	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.	Further consultation has been undertaken with HES on the finalised list of historical assets assessed within the EIAR, with a response received on 5th December 2025 (as detailed in the Post-Scoping section of this Technical Appendix).
	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.	Further consultation has been undertaken with HES , with a response received on 5th December 2025 (as detailed in the Post-Scoping section of this Technical Appendix).
Noise	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”.	Noted. The noise assessment has been undertaken in accordance with these documents, further details in Chapter 10: Noise and Vibration (EIAR Volume 2) and Technical Appendix 10.1: Environmental Noise Assessment (EIAR Volume 4) .
Ornithology		
Bird Surveys	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.	Refer to NatureScot response below.
	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.	Refer to RSPB response below.

Ornithology	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.	Further review of black grouse and wader activity on the Site, as well as review of historical data from RSPB, has been undertaken as part of the EIA. The rationale for the scope of assessment is described in Chapter 7: Ornithology (EIAR Volume 2) . In addition, consideration has been made of measures incorporated into Technical Appendix 6.7: Outline Biodiversity Enhancement Management Plan (EIAR Volume 4) that would have direct and/or secondary beneficial effects for these species and their relevant habitats.
	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).	Potential impacts on hen harrier, golden plover and merlin, in relation to the Muirkirk and North Lowther Uplands SPA have been considered in Chapter 7: Ornithology (EIAR Volume 2) .
	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.	Although significant effects at a population level are more likely to occur from impacts on breeding individuals, the potential for significant effects on non-breeding birds has been evaluated within the EIA on a species-by-species basis. Where the potential has been identified, the EIA Report has included an assessment of effects on that species, even if there is a lack of evidence for breeding within the study area.
	NatureScot requests that Merlin are included in the EIA's collision risk model and includes 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.	Merlin have been included in Technical Appendix 7.3: Collision Risk Modelling (EIAR Volume 4) . Results and relevant assessment have been included in Chapter 7: Ornithology (EIAR Volume 2) .
	The Scottish Ministers recommend bird surveys must be carried out in relation to the qualifying features of the relevant SPAs / SACs.	Surveys carried out include flight activity, breeding bird, breeding wader, winter walkover and targeted species. These included the qualifying features of the Muirkirk and North Lowther Uplands SPA.
Ecology		
Protected species	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 helveticas) • Oyster catchers (Haematopus longirostris)	Relevant protected species surveys have been undertaken for the Site, along with a desk-study; the results have been presented in Technical Appendix 6.3: Protected Species Survey Report (EIAR Volume 4) and Chapter 6: Ecology (EIAR Volume 2) and respective species scoped out or scoped in and assessed as necessary in line with relevant policy, guidance, or standards.
Fish	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.	Baseline fisheries surveys have been carried out on several watercourses on and around the Site by the Clyde River Foundation (CRF); the results are presented in Technical Appendix 6.5 (EIAR Volume 4) , with relevant assessment presented in Chapter 6: Ecology (EIAR Volume 2) . Any scoping in or scoping out of important ecological features (IEFs), such as fish, in the EIAR has been based upon survey findings and desk-study data which characterises the baseline situation and the professional judgement of the EIA team and experience from other relevant projects and policy guidance or standards. The Applicant would support a condition securing continued fish monitoring, as part of a fish monitoring plan (FMP), in line with relevant MD-SEDD guidance.
Forestry	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.	Due to design changes since scoping, the proposed development no longer has potential to intersect with the proposed afforestation scheme within Glenochar. The design evolution process is described in Chapter 3: Design Evolution and Alternatives (EAIR Volume 2) .
Borrow Pits	Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	A borrow pit assessment has been prepared in accordance with the requirements set out in PAN 50 and is included as Technical Appendix 2.2: Borrow Pit Assessment (EIAR Volume 4) . It is anticipated that further details would be secured by a suitably worded condition if Section 36 Consent and Deemed Planning Permission were granted.
Transport	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).	Consultation with Transport Scotland on access from the A74(M) has been undertaken and access via this route agreed. Refer to Chapter 9: Traffic and Transport (EIAR Volume 2) for further details on transport and access.
Access routes	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.	An Outdoor Access Management Plan has been prepared and submitted as Technical Appendix 9.2: Outdoor Access Management Plan (EIAR Volume 4) , which considered the potential impacts on walking routes, including those identified by ScotWays.
Eskdalemuir	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.	Refer to JRC and MOD responses below (Non-Statutory Consultees section of this Technical Appendix).
	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.	Refer to MOD response below (Non-Statutory Consultees section of this Technical Appendix).
	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	
	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.	

Aviation	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).	Glasgow Prestwick Airport Limited indicated in its scoping response that its concerns pertaining to potential impacts on its satellite-based navigation (RNP) Instrument Flight Procedures (IFPs), in particular the Terminal Arrival Altitude (TAA) would be removed upon completion of an IFP scheme for Sanquhar II windfarm (in construction) which would see the TAA increased to 3900ft. This change became effective as at 12 September 2025. Given the TAA is now 3900ft, according to GPA’s scoping response, this eliminates the requirement for an IFP assessment for Ravengill and will allow the airport to remove its holding objection.
	National Air Traffic Services (NATS) have concerns that the proposed development conflicts with their safeguarding criteria. NATS predicts that the Ravengill’s turbines would have a negative impact on Lowther RADAR, Cumbernauld RADAR and Prestwick Centre Air Traffic Control.	See response to NATS Safeguarding below (Non-Statutory Consultees section of this Technical Appendix).
Health and Safety	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)	The operator of the gas pipelines is National Gas Transmission, while the North West Ethylene Pipeline is operated by and the responsibility of Sabic UK Petrochemicals Ltd. Pre-application consultation has been undertaken to confirm the locations of the infrastructure and requirements for crossing where relevant. Locations of the pipelines relevant to the Site are shown on Figure 3.2: Environmental Constraints (EIAR Volume 3a) .
Gas Pipeline	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.	As above, the pipeline operators have been consulted at application stage and there have been pre-application discussions to establish pipeline locations and crossing requirements. Based on information gathered, locations of the pipelines relevant to the Site are shown on Figure 3.2: Environmental Constraints (EIAR Volume 3a) . Evidence has been presented in Chapter 3: Desing Evolution and Alternatives (EIAR Volume 2) about the consideration given to the integrity and protection of the pipelines from developmental and operational works.
Scope	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	Population is scoped out as a chapter, however a supporting report titled Maximising Socio-economic Benefits has been produced which focusses on population characteristics, employment and economic activity, industrial structure and tourism. This has been submitted as part of the Section 36 application for the Proposed Development. Human Health is scoped out as chapter, however has been assessed as part of standard methodology in relevant chapters of the EIAR (E.g. Noise, Traffic and Visual). Appropriate control measures to ensure potential construction effects on air, noise and water quality have been addressed through Technical Appendix 2.1: Outline Construction Environmental Management Plan (EIAR Volume 4) . Air Quality is scoped out as a chapter. The main activities that could have potential impacts would be limited to construction works, control measures for which are set out in Technical Appendix 2.1 (EIAR Volume 4) . Shadow Flicker is scoped out as a chapter, however a technical report has been included as Technical Appendix 1.7: Shadow Flicker Appraisal (EIAR Volume 4) which sets out the predicted shadow flicker effects and, where necessary, appropriate mitigation. The Applicant has proposed a reduced lighting scheme for approval by the Civil Aviation Authority and the Ministry of Defence, details are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4) . Muirkirk and North Lowther Uplands SPA has been scoped into Chapter 6: Ecology and Chapter 7: Ornithology (EIAR Volume 2) . Detailed Flow Rate Calculations is scoped out of assessment. A detailed assessment of potential flow rates at proposed watercourse crossing locations would be carried out by the contractor at the detailed design stage, such that all of the watercourse crossings identified for the Proposed Development would be designed in compliance with the requirements of <i>The Environmental Authorisations (Scotland) Regulations 2018</i> . The current recommendation is that ETSU-R-97 should continue to be used for the assessment and rating of operational noise from wind farms. Therefore specific assessments of infrasound and low frequency noise have not been undertaken (see Technical Appendix 10.1: Environmental Noise Assessment, EIAR Volume 4). Annex A of Technical Appendix 10.1 has also considered the latest supporting information on these subjects and the topic of wind turbine blade swish or Amplitude Modulation (AM).
Existing infrastructure	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.	The design and layout of the proposed development has taken due cognisance of existing infrastructure on and adjacent to the Site boundary, including those listed here. Full details are presented within the EIAR, refer to Figure 3.2: Environmental Constraints (EIAR Volume 3a) and Chapter 3: Design Evolution and Alternatives (EAIR Volume 2) for further information.
Dangerous substances	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.	Hazardous substances would not be stored at the Site in such quantities that Hazardous Substances Consent would be required. Hazardous substances used on site during construction would be managed through the CEMP. During Operation, appropriate site management measures would be implemented to manage any such materials. An Outline CEMP has been provided in Technical Appendix 2.1 (EIAR Volume 4) .
Further consultation	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.	Noted. Further consultation has been undertaken and included where relevant in sections below.
Mitigation Measures	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.	Noted. Mitigation measures identified in each technical chapter (contained in Volume 2 of the EIAR) have been summarised in a concluding section. A schedule of mitigation has been produced and is presented in Chapter 11: Schedule of Environmental Mitigation (EIAR Volume 2) .

		Conclusion	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).	Noted. The Applicant has engaged with the relevant parties throughout the EIA process as suggested by the Scottish Ministers. This Consultation Register forms a Technical Appendix to Chapter 1: Introduction (EIAR Volume 2) and includes details of where the matters raised in the Scoping Opinion have been addressed throughout the EIAR.
Statutory Consultees				
South Lanarkshire Council	17/06/2025	Scoping Report	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.	Noted. Chapter 11: Schedule of Mitigation (EIAR Volume 2) summarises all of the mitigation and enhancement measures proposed in order to avoid, reduce or offset predicted significant environmental effects.
		LVIA	LVIA1 – 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.	Noted. The LVIA is presented in Chapter 4 : Landscape and Visual Amenity (EIAR Volume 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 nay additional visualisations will be required to inform the assessment.	Noted. Cultural heritage assets are scoped in to assessment in Chapter 5: Cultural Heritage (EIAR Volume 2) .
		Ecology	ECO1 – SLC 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 – SLC 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	Noted. The ecological assessment is presented in Chapter 6: Ecology (EIAR Volume 2) .
		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.	Noted. The ornithological assessment is presented in Chapter 7: Ornithology (EIAR Volume 2) .
		Hydrology	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	Noted. The hydrology assessment is presented in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) .
		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.	Noted. The traffic and transport assessment is presented in Chapter 9: Traffic and Transport (EIAR Volume 2). The Site access locations include construction accesses on the B797 and Abnormal Indivisible Load (AIL) delivery vehicles would access the Site via a newly provided temporary construction Site entrance from the A74(M), with a crossing of the B797 to access the western area of the Site. As such, the Study Area has been updated to include the roads which would be impacted by construction traffic, which would include the following: •The B797 Leadhills Road, between the A702 and Leadhills; •The C16 Crawfordjohn Road, within the Site boundary; •The A702, between Junction 13 of the M74 / A74 (M) and Junction 14 of the A74(M); and •The M74 / A74(M) between Junctions 12 and 14.

		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.	Noted. The noise assessment is presented in Chapter 10: Noise and Vibration (EIAR Volume 2) .
		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	Noted. The aviation assessment is presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4) .
SEPA	17/06/2025	Engagement	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.	Noted. Habitat survey work has been completed of all areas within the Site boundary, which includes survey coverage within 250m of all proposed excavations (where land access was permissible). Full details of survey methodologies and findings are presented within Technical Appendix 6.2: National Vegetation Classification & Habitats Survey Report (EIAR Volume 4) with results and relevant assessment presented in Chapter 6: Ecology (EIAR Volume 2) . Surveys to inform the Peat Condition Assessment have been undertaken on Site, and the results of these surveys are also presented in Technical Appendix 6.2: (EIAR Volume 4) . Peat probing - details of the Stage 1 and Stage 2 peat probing survey findings are presented in Technical Appendix 8.5: Peat Depth Survey Results (EIAR Volume 4) with results and relevant assessment presented in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) and illustrated on Figure 8.6: Peat Depth (EIAR Volume 3a) and have been used to influence the design, including placement of turbines and infrastructure.
		General Advice	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.	The requested information is presented in the following figures within Volume 3a of the EIAR: Figure 6.4: Potential GWDTE Survey Area and Results Figure 6.5: Peatland Condition Assessment (PCA) Survey Area and Classification Results Figure 8.1: Surface Water Features Figures 8.6: Peat Depth Plan A description of the design evolution of provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) , which notes the constraints which were taken into account during the design process.
		Site specific comments	Peat 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	The peat depth survey results are presented in Technical Appendix 8.5: Peat Depth Survey Results (EIAR Volume 4) , the outline peat management plan is presented in Technical Appendix 8.6: Outline Peat Management Plan (EIAR Volume 4) and the Peat Landslide Hazard Risk Assessment is presented in Technical Appendix 8.7: Peat Landslide Hazard Risk Assessment (EIAR Volume 4) . With results and relevant assessment presented in Chapter 8: Hydrology, Hydrogeology, and Geology (EIAR Volume 2) .
			Potential GWDTE 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.	Full details of survey methodologies and findings have been presented within Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) .
			Private Water Supplies 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.	The locations of all PWS identified within 250m of the Site boundary has been presented in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) , and the assessment of potential impacts on PWS is presented in Technical Appendix 8.4 (EIAR Volume 4) .
			Water Crossings 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.	Relevant guidance has been followed during the EIA process, refer to Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) for further details.
			The issues covered in Appendix 1 below, which provides details of SEPA's 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 SEPA's satisfaction in the EIA process. This provides details on SEPA's information requirements and the form in which they must be submitted. 1. Site layout drawings and detail of design evolution and site selection 2. Peatland and other carbon rich soils (CRS) 3. Water environment 4. Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and existing groundwater abstractions 5. Flood risk 6. Environmental enhancements 7. Forest removal and forest waste 8. Pollution prevention and environmental management 9. Life extension, repowering and decommissioning 10. Other planning matters 11. SEPA authorisation	Noted. SEPA's information requirements have been considered in the production and final compilation of the EIAR.
NatureScot (NS)	04/09/2025	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. NatureScot considers 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. NatureScot considers that the impacts would be difficult to overcome through design mitigation due to the siting of the proposal. NatureScot provides 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.	Noted. The assessment of potential impacts on landscape and visual amenity is presented in Chapter 4: Landscape and Visual Amenity (EIAR Volume 2) ; further engagement with NatureScot has been undertaken during the EIA process as specified below.

General pre-application and scoping advice	The scoping report broadly covers the topics that NatureScot would expect to see included in the EIA report. The NatureScot website includes a wide range of standing advice and guidance documents which should be followed 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 NatureScot recommends 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 outlines 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.	Noted. Relevant guidance has been followed in the preparation of the EIA Report.
Biodiversity Enhancement	NatureScot welcomes 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.	An outline biodiversity enhancement and management plan (OBEMP) is presented in Technical Appendix 6.7: Outline Biodiversity Enhancement Management Plan (EIA Volume 4) .
Decommissioning	NatureScot recommends 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.	Potential impacts from decommissioning have been addressed as relevant within the EIA technical assessments.
Landscape and visual amenity	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 previous established. The landscape of the Lowther Hills is characterised by ‘a small but dramatic range of smoothly domed hills, incised by deep glens, 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: - 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 afforested 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/ tranquility/ dark skies) 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. <u>Strategic Development Pattern</u> 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 development, 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 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’ [quote from NatureScot: Harryburn Wind Farm Response Letter dated 06 October 2017]. 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.	Noted. Further consultation has been undertaken with NatureScot during the EIA process and the relevant assessment and mitigation proposed are presented in Chapter 4: Landscape and Visual Amenity (EIA Volume 2).

	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.	
	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.	Follow-up consultation on night-time LVIA viewpoints and visualisations has been undertaken with NatureScot to confirm the final list of viewpoints considered in the LVIA. For further information on the final viewpoint list refer to Chapter 4: Landscape and Visual (EIAR Volume 2) .
	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.	Noted.
	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; - Allenlyic 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. 360-degree baseline photography from viewpoints should be included.	These viewpoints have been considered and follow-up consultation on LVIA viewpoints has been undertaken with NatureScot to confirm the final list of viewpoints considered in the LVIA. For further information on the final viewpoint list refer to Chapter 4: Landscape and Visual (EIAR Volume 2) .
	LVIA 4: Are there any comments on the approach to assessing the effects of turbine aviation lighting? NatureScot guidance should be 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.	Noted, the principles set out in guidance have been followed during the assessment of aviation lights including further consultation on viewpoint selection for the night-time assessment. Results are presented in Technical Appendix 4.6: Aviation Lighting Assessment (EIAR Volume 4) .
	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.	Noted.
	LVIA 6: Are there any comments or suggestions on the approach to cumulative landscape and visual assessment? No comment.	Noted.
	LVIA 7: Are consultees in agreement with the proposed methodology to be applied to the LVIA? We are in agreement.	Noted.
Protected Areas	NatureScot recommends 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. NatureScot agrees 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.	Relevant protected sites have been identified and assessed within Chapter 6: Ecology and Chapter 7: Ornithology (EIAR Volume 2) .
	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.	As a geological SSSI, this has been considered within Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2) .
Ornithology	3. Ornithology (a) Scoping Report Questions <i>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?</i> NatureScot has 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.	Noted. Two years of ornithology survey have been completed (breeding and non-breeding seasons), with viewsheds and survey areas covering all relevant areas of the Site. Details are presented in Technical Appendix 7.1: Baseline Ornithology Surveys (EIAR Volume 4) and supporting Annexes A and B . The assessment limitations section of Chapter 7: Ornithology (EIAR Volume 2) describes the baseline survey coverage with regards to the finalised design.
	<i>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?</i> NatureScot is in agreement subject to further information from the field surveys.	Noted.
	<i>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?</i> NatureScot is in agreement subject to further information from the field surveys.	Noted.
	<i>OR4 - Do consultees agree with the proposal to scope out effects relating to lighting/decommissioning and ornithology?</i> NatureScot is in agreement subject to further information becoming available from the field surveys.	Noted.
	<i>OR5 - Do consultees agree that the methodology and scope of the assessment is appropriate?</i> 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.	Noted.
	<i>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.</i>	Noted.

		Priority Peatland Habitat	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. NatureScot recommends that survey and assessment for peatland habitats follows our peatland guidance: https://www.nature.scot/doc/advising-peatland-habitats-and-carbon-rich-soils-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.	Peatland condition surveys have been undertaken in relevant areas and results presented within Annex D: Peatland Condition Assessment of Technical Appendix 6.2: National Vegetation Classification & Habitats Survey Report (EIAR Volume 4) and accompanying Figure 6.5: Peatland Condition Assessment (PCA) Survey Area and Classification Results (EIAR Volume 3a) .
		Protected species	5. Protected species NatureScot recommends 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.	The protected species surveys have covered the entirety of the Site boundary, plus additional areas where access permissions allowed. The extent of the protected species survey area, along with the results, has been detailed and presented in Technical Appendix 6.2: National Vegetation Classification & Habitats Survey Report (EIAR Volume 4) .
			The EIA report should 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	The assessment methodology for assessment of potential impacts on protected species is set out in Technical Appendix 6.1: Assessment Methodology (EIAR Volume 4) .
Historic Environment Scotland (HES)	17/07/2025	Scope of assessment	HES welcomes the inclusion of the Managing Change: Setting guidance and the EIA Handbook in the list of relevant policy and guidance on page 24 and recommends that any assessment methodology tools not specified in the scoping report, like matrixes, follow the examples in the handbook (if used). HES also welcomes that the assessment will consider the potential impacts on designated heritage assets within the context of National Planning Framework 4 (NPF4); however, HES notes 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.	Noted.
			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 HES advises that the EIA report should assess the entire development (including access).	The EIA Report has assessed potential impacts associated with all aspects of the Proposed Development, including turbines, BESS, substation, access tracks and other associated infrastructure, including borrow pits.
			HES welcomes the intention to assess the cumulative impacts of the proposed development with others in the vicinity. HES should be included in any further consultation on the assessment of cumulative impacts alongside the other consultees listed on page 28. Generally, HES advises 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.	Noted. Cumulative impacts have been considered in all technical assessments within the EIA.
		Scheduled Monuments	The scoping report does not list any scheduled monuments to be scoped in or out of the EIA assessment. However, HES is content with the description of how assets will be chosen for consideration in the section titled “Assessment of Effects on Setting” (pg. 27). Further consultation should be undertaken with HES as the assessment moves forward, to ensure the list of assets for assessment meets their needs. HES noted that no specific approaches to mitigation measures for direct impacts or impacts on setting have been described in the scoping report. HES recommended 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. 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 ark 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.	Noted. Further consultation with HES has been undertaken as part of the EIA process. Further consultation with HES was undertaken in November 2025, to provide an update on the design of the proposed development and to agree suitable viewpoints for assessment with the EIA. A response was received from HES on 5th December 2025, in which HES acknowledged the design revisions that the Proposed Development has undergone since HES's scoping response was provided and confirmed HES's satisfaction with the viewpoints and visualisations proposed (see details under Post-Scoping Consultation below). Detailed assessment has been carried out for all relevant heritage assets identified by HES in their scoping response and in subsequent correspondence; the assessment is presented in Chapter 5: Cultural Heritage (EIAR Volume 2).

HES welcomes 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, HES highlights several scheduled monuments that are recommend for detailed assessment because they may experience significant adverse impacts. 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.

[continued] 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 fermtoun 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'.
[continues] 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 Glenochar valley, with the nearest of the proposed turbines located c.1km to the northwest 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	HES welcomes 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, HES particularly welcomes 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, HES considers 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 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. HES 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 and 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.	
Internal Scottish Government Advisors				
Transport Scotland	18/06/2025	Traffic and Transport	With regard to the potential for taking direct access from the motorway, Transport Scotland is not aware of any discussions having taken place regarding a potential direct access from the A74(M) and would draw attention to NPF4 Policy 13. Notwithstanding the above, any new/upgraded accesses onto the trunk road network would require the applicant to deliver a junction designed in compliance with the requirements of the Design Manual for Roads and Bridges (DMRB), specifically CD123 - Geometric design of at-grade and signal-controlled junctions. Transport Scotland would recommend that early consultation is undertaken with the Transport Scotland Area Manger for the A74(M) who is David Fleming.	The Site access locations would include construction accesses on the B797 and AIL delivery vehicles would access the Site via a newly provided temporary construction Site entrance from the A74(M), with a crossing of the B797 to access the western section. Indicative Site access layouts are provided in Technical Appendix 9.1: Transport Assessment (EIAR Volume 4). The temporary construction access would be designed in accordance and in compliance with the requirements of the Design Manual for Roads and Bridges (DMRB), specifically CD123 - Geometric design of at-grade and signal-controlled junctions. Consultation with Transport Scotland on the use of a proposed temporary site access for AILs from the A74(M) during the construction phase of the proposed development is now underway and is anticipated to continue, as appropriate, until commencement of construction.
			The SR states that base traffic survey data for the A74(M) would be obtained from the Transport Scotland database, whilst new Automatic Traffic Count (ATC) survey data from the A702(T), B797 and B7040 would be obtained. Future traffic flows will be factored from surveyed data using Low Growth factors estimated from National Road Traffic Forecasts. This is considered appropriate.	Details of sources of traffic data are provided in Section 5.4 of the Transport Assessment (Technical Appendix 9.1, EIAR Volume 4) and in the Existing Conditions section of Chapter 9: Traffic and Transport (EIAR Volume 2). Traffic information relating to the trunk road was obtained from the Traffic Scotland database. Comment noted that it is acceptable to scope out the Operational and Decommissioning phases.
			It is noted that any impacts associated with the operational and decommissioning phases of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance.	Noted.
			The SR indicates that detailed swept path analysis will be undertaken for the main constraint points on the route from the port of entry (likely to be King George V Docks, Glasgow) through to the site access junction to demonstrate that the turbine components can be delivered to Site and to identify any temporary road works which may be necessary. We would add that a full ALA report should be provided that identifies key pinch points on the trunk road network, with details provided with regard to any required changes to street furniture or structures along the road	Noted. An Abnormal Indivisible Load Route Survey Report is provided as Annex B to Technical Appendix 9.1: Transport Assessment (EIAR Volume 4).
Marine Directorate – Science Evidence Data and Digital (MD-SEDD)	10/09/2025	Scoping Guidelines	MD-SEDD provided generic scoping guidelines for both 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 development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.	MD-SEDD guidance has been followed during the EIA process. The MD-SEDD checklist is presented in Technical Appendix 6.8 (EIAR Volume 4).
		Guidelines - SACs	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.	There are no SACs located downstream of the Proposed Development; therefore, there is no potential impact on fish species associated within such a designation.

Guidelines - SACs

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.

		EIA Checklist	The generic scoping guidelines should ensure that all matters relevant to freshwater and diadromous fish and fisheries have been addressed and presented in the appropriate chapters of the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA contains the required information. The absence of this information could delay the process.	MD-SEDD guidance has been followed during the EIA process.
Scottish Forestry	12/06/2025	Forestry	Thank you for the opportunity to comment on this proposal. I have reviewed the scoping report and note that it includes the following statements: - “It is anticipated that no areas of sensitive woodland or commercial forestry plantation would be affected by the Proposed Development. Therefore, there will be no requirement for the development of forestry felling and re-stocking proposals in accordance with The Scottish Government’s Control of Woodland Removal Policy”, - “The Ancient Woodland Inventory (AWI)44 shows there are no stands of ancient woodland located within the Site.” Consequently, as currently formulated, the proposals do not affect any forestry interests.	Noted.
Non-Statutory				
Aberdeen Airport	20/06/2025	Aviation	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	Noted.
British Horse Society (BHS)	23/06/2025	Access and Recreation	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.	Noted. Equestrians have been included in the assessment and within the Technical Appendix 9.2 Outdoor Access Management Plan (OAMP) (EIAR Volume 4) .
BT	18/05/2025	Telecoms	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 reconult 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	Noted.
Edinburgh Airport	02/07/2025	Aviation	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.	Noted.
Glasgow Airport	27/06/2025	Aviation	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 finalised 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.	Ravengill is under the 25-40nm sector of Glasgow Airport's ATCSMAC which has as its base 4000ft amsl. Responsibility for IFP safeguarding rests with the aerodrome. At 33.6nm from GLA’s aerodrome reference point, the Proposed Development is likely to be outwith GLA’s IFP safeguarding zone. The Proposed Development’s sister development, M74 West, is closer to GLA and did not attract any IFP objection upon application although was met with the same standard words at scoping. Further details on the Aviation Assessment are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4) .
Glasgow Prestwick Airport	11/06/2025	Aviation	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).	Noted.
			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. 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.	Potential impacts on Instrument Flight Procedures (IFPs) have been assessed and are presented in Technical Appendix: 2.3: Aviation Assessment (EIAR Volume 4) .
			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 maybe visible to the Airport’s primary radar.	Noted.
			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 Ravengill 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.	No impact on any IFP is anticipated from the Proposed Development; potential impacts on aviation have been assessed and are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4) and further consultation with the CAA will be undertaken following submission of the consent application.
			In response to the Aviation section commencing at Section 3.10 of the Ravengill 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 micrositing and maximum elevation above mean sea level within that micrositing 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 of whether any IFP infringements are present. The findings of any Developer provided IPF reports would need to be verified by our contracted IFP Safeguarding provider.	Noted. Potential impacts on aviation have been assessed and are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4) and further consultation with the CAA will be undertaken following submission of the consent application.

			Conclusions: This development raises aviation safety concerns and would have a potential operational impact on the Airport as an ANSP. Consequently, the airport would lodge an initial holding objection to this development should it proceed to a full Section 36 Application, until such a time as the aviation safety issues are fully examined, defined, and resolved to both the Developer and the Airport's satisfaction. We believe that the confirmation of the elevations upon which the turbines will be constructed followed by a 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	No impact on any IFP is anticipated from the Proposed Development; potential impacts have been assessed and are presented in Technical Appendix: 2.3: Aviation Assessment (EIAR Volume 4) .
Health and Safety Executive (HSE)	13/06/2025	Major Accidents	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.	Noted.
			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	Noted.
			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://ukopa.co.uk/document-category/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	Noted. The operator of the NWEF pipeline is SABIC UK Petrochemicals Ltd, who have been consulted during the EIA process. Evidence has been presented in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) about the consideration given to the integrity and protection of the pipelines from developmental and operational works.
Highlands and Islands Airports Ltd (HIAL)	30/06/2025	Aviation	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted.
Joint Radio Company (JRC)	20/06/2025	Telecommunication links	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 JESPV04 >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.	A telecommunications impact assessment has been completed as part of the EIA process to identify all fixed links that cross the Site and ensure that turbines and infrastructure are located at sufficient distance from such links to eliminate the possibility of potential significant effects, refer to Technical Appendix 1.6: Telecommunications Impact Assessment Report (EIAR Volume 4). Liaison with JRC is ongoing, in order to understand the mitigation options available for the potential interference issues with their links.
NATS Safeguarding	27/06/2025	Aviation	In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted. Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.	Response superseded by Technical and Operational Assessment (TOPA) received in later email dated 27 June 2025
	27/06/2025	Aviation	The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG39557.	Noted.

			En-route RADAR Technical Assessment Predicted Impact on Lowther RADAR Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR’s probability of detection, for real aircraft, is also anticipated. Degradation in the performance of the co-located SSR is expected. Work is ongoing to fully understand the technical impact and subsequently determine how operationally significant or not this is likely to be. Predicted Impact on Cumbernauld RADAR Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR’s probability of detection, for real aircraft, is also anticipated. En-route operational assessment of RADAR impact Where an assessment reveals a technical impact on a specific NATS’ RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not. Unit: Prestwick Centre ATC; Comment: PSR impact in isolation is Unacceptable, any additional impact on the SSR will need to be assessed.	It is acknowledged that the Proposed Development is in primary radar line of sight of NATS En Route’s Lowther Hill and Cumbernauld PSR and the Applicant is in discussion with NATS as to the optimal mitigation strategy (either optimisation of the Lowther Hill Indra or blanking and infill using a feed from Glasgow Airport’s Terma Scanner 4002) and its concomitant commercial terms. With respect to potential SSR impacts, in early 2025 the Applicant supplied NATS with detailed modelling on these matters undertaken by QinetiQ. The QinetiQ study establishes that the Proposed Development should not cause SSR bearing errors which would detrimentally impact NERL’s ATS. Engagement with NATS is ongoing. Further details on the proposed mitigation are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4).
			En-route Navigational Aid Assessment Predicted Impact on Navigation Aids No impact is anticipated on NATS’ navigation aids. En-route Radio Communication Assessment Predicted Impact on the Radio Communications Infrastructure It is clear that there will be some degradation in the performance of the Lowther Hill air ground air installation from some of the closer, higher turbines. Work is ongoing to determine the likely volume within which this degradation is likely to occur and subsequently determine how operationally significant or not this is likely to be.	Noted with respect to Navigational Aids. With respect to potential AGA impacts, in early 2025 the Applicant supplied NATS with detailed modelling on these matters undertaken by QinetiQ and has been seeking engagement with NATS since to discuss these findings to determine what if any impacts are either technically or operationally unacceptable to NATS and so identifying any necessary mitigation strategy. The QinetiQ study establishes that while the Proposed Development may cause some AGA impacts, this is not predicted to be in airspace such that it would have a detrimental impact on NERL’s ATS. Engagement with NATS is ongoing. Further details on the proposed mitigation are presented in Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4).
MOD / DIO	16/07/2025	Eskdalemuir Seismological Array	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. 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	Policy and research work to resolve this issue is ongoing, an Eskdalemuir Seismic Impact Report has been provided for the Proposed Development in Technical Appendix 1.5 (EIAR Volume 4).
		Aviation	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.	
ONR	11/06/2025	Infrastructure/Major Accidents	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site	Noted.
RSPB Scotland	01/07/2025	Ornithology	<i>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.</i> NatureScot guidance states that the area of flight activity survey should encompass the maximum extent of the proposed turbine layouts plus a 500m buffer¹ over a minimum of two years to account for variation. However, the Scoping Report (Section 3.6.3) and Figures 3.6.1-3.6.3 confirm that four turbines were not visible during VP surveys in 2023 and 2024. Figure 3.6.4 also confirms that survey work for breeding waders and Black Grouse did not cover the whole site plus the appropriate buffers. Therefore, it would appear that only one year of ornithology survey work will be completed across the entire site plus the appropriate survey buffers, as the southeast area was not surveyed in 2023/2024. The Scoping report suggests that the above omissions are unlikely to affect the assessment of impact, which we are unable to conclude without full details of survey s work results already undertaken. We recommend that the above omissions are addressed as part of the EIA process.	Turbines 28, 30, 31 and 32 of the Scoping Layout were located outwith the viewshed coverage of the first non-breeding season (2023/2024) and turbines 28, 31 and 32 were also outwith the viewshed coverage of the first breeding season (2024). Viewshed coverage was revised and extended for the start of the 2024/2025 non-breeding season to include these turbines. All turbines were covered by the 2024/2025 non-breeding season and 2025 breeding season viewshed coverage; however it should be noted that turbines 28-32 of the Scoping Layout are no longer included in the Proposed Development. Full detail of the Collision Risk Modelling is provided in Technical Appendix 7.3 of the EIA Report (Volume 4). It is acknowledged in section 3.6.3 of the Scoping Report that the year 1 black grouse, scarce breeding bird and breeding wader survey buffers did not extend fully over the small additional area which was added to the Site in September 2024. However, year 2 survey buffers for these surveys were adjusted to account for this additional area. Furthermore, the design changes made to the Scoping Layout to finalise the layout of the proposed development have meant that these areas are no longer relevant. Consequently, it was decided that there was appropriate coverage of the turbine area to undertake the assessment.

		<i>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?</i> Section 3.6.4 of the Scoping Report states that species not included on the BoCC red-list will be scoped out of further assessment. Black Grouse is a red-listed, UK BAP species which is undergoing serious declines in southern Scotland. With fewer than 200 lekking males recorded across the region by conservation organisations since 2022, there are growing concerns that this species may become regionally extinct. Page 43 of the Scoping Report confirms that Black Grouse are present within the Proposed Development site during the breeding season, yet this species is not listed as an IOF on page 46 and appears to have been scoped out of further assessment. Due to the status of this species both regionally and nationally, we strongly recommend that Black Grouse is included as an IOF and scoped in to further assessment at EIA. The Proposed Development is situated within a key area for breeding waders, as evidenced by the Clyde Valley Wader Initiative (CVWI) which has recorded wader densities of regional importance through survey work in the area. Through this initiative, RSPB Scotland works closely with local farmers and landowners to assist the trialling and funding of habitat management to maintain the status of breeding waders in this area. The BTO Wader Map2 confirms that this area is of high importance for breeding waders. Whilst the Scoping Report states that eight species of breeding wader have been recorded on site through survey work, it is only planning to scope in red-listed species. This would exclude the wider breeding wader assemblage and amber-listed declining species, including Oystercatcher, Snipe, Redshank, Common Sandpiper, and Ringed Plover, all of which are amber or red-listed on the BoCC3 . Due to the high importance of this area for breeding wader species, we strongly recommend that the full assemblage of breeding waders recorded on site is scoped in for further assessment at EIA to allow for an accurate assessment of impacts. We agree with the Scoping report that it is not possible to scope out species at this stage and we recommend that all raptor species that have been recorded on site remain scoped in for full assessment during the EIA process. We also recommend that this assessment includes all potential impacts, and not just collision risk which is suggested. We disagree with the decision to scope out “effects relating to any target species not identified to be breeding within the relevant Study Area” (page 45), as this does not take into account impacts on important foraging areas that support breeding populations, or impacts on roosting or wintering species, such as raptors.	Further review of black grouse and wader activity on the Site, as well as review of historical data from RSPB, has been undertaken as part of the EIA. The rationale for the scope of assessment has been described in Chapter 7: Ornithology (EIAR Volume 2). In addition, enhancement measures have been incorporated into Technical Appendix 6.7: Outline Biodiversity Enhancement Management Plan (EIAR Volume 4) which would have direct and/or secondary beneficial effects for these species and their relevant habitats.
		<i>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?</i> The Muirkirk and North Lowther SPA is noted in the Scoping Report as being c.3.6km from the site. Whilst this is outside the core foraging range for qualifying feature breeding Hen Harrier (2km), it is well within the maximum range of 10km4 . Page 43 notes that for Hen Harrier “two potential breeding attempts” were recorded during survey work, and we consider that there is potential connectivity to the SPA population. Whilst the site lies outwith the core foraging range for qualifying feature breeding Golden Plover (3km), it is well within the maximum range for this species (11km)4 . Golden Plover were recorded both during flight activity surveys and breeding bird surveys, and we consider that there is potential connectivity to the SPA population. We strongly recommend that sufficient information is included in the EIA to allow an Appropriate Assessment of the impacts of this proposal on qualifying species Hen Harrier, Golden Plover, and Merlin in relation to the Muirkirk and North Lowther SPA. Short-eared Owl and Peregrine Falcon were both recorded on site, and are included as part of the breeding bird assemblage feature of the North Lowther Uplands SSSI. The Proposed Development site falls within the maximum range for both of these species (5km and 18km, respectively), which suggests potential connectivity with this SSSI. We therefore recommend that the Muirkirk and North Lowther Uplands SSSI remains scoped into the EIA.	It has not been the approach to use the maximum foraging ranges for connectivity but instead use the core ranges. Furthermore, NatureScot connectivity guidance indicates that the distance between alternative nest sites for hen harrier is 1km and so any breeding activity on the site would not be considered to be related to the SPA population but rather to the regional population. NatureScot has confirmed in their response provided to OR3 that they agree with the proposal to scope out all species listed on the SPA designation bar merlin on the basis of core foraging ranges. The rationale for the scope of assessment has been described in Chapter 7: Ornithology (EIAR Volume 2).
		<i>OR5 – Do consultees agree that the methodology and scope of the assessment is appropriate?</i> The footprint of the Proposed Development intersects and overlaps the footprint of a proposed afforestation scheme (Glenochar5), which is currently at EIA Scoping stage. However, we could not find any mention of this scheme within the Scoping Report, and it is proposed to scope out forestry issues (4.7). Due to the importance of this area for breeding waders, and the potential for cumulative impacts of the Proposed Development and the proposed afforestation scheme on these sensitive species, we strongly recommend that the Glenochar proposed afforestation scheme is included within the assessment of cumulative impacts. The sections on construction and operational impacts (page 44) of the Proposed Development on birds conflates the issues of human disturbance with those of displacement due to development. These are two separate issues, and their impacts on ornithology should be assessed separately for both construction and operational phases. We note the statement in Table 3.2 that cumulative schemes to be considered would include onshore wind developments “within 15km of the Site”. However, we recommend that the cumulative assessment should consider all development proposals within the relevant NHZ in line with NatureScot guidance6 . As the boundary of the Proposed Development includes areas of both NHZ 19 and NHZ 20, we recommend that the assessment of cumulative impacts should include all developments within both of these NHZs, in line with NatureScot guidance7 . For species such as Black Grouse, Golden Eagle, and Hen Harrier, where more recent data on population estimates are available, the most up to date data should be used to ensure a robust assessment of impacts for the Proposed Development, and cumulative impacts.	Due to the design changes made since the Scoping Layout was proposed, the Proposed Development no longer has the potential to interact with the proposed Glenochar afforestation scheme; therefore, this has not been considered in the EIA. The assessment of construction/operational effects considers displacement and disturbance impacts. Chapter 7: Ornithology (EIAR Volume 2) includes a cumulative study and considers the area for the cumulative study at the NHZ level. This acknowledges that the Site spans NHZ 19 and NHZ 20 and that the appropriate NHZ for any cumulative assessment has been considered per IOF (Important Ornithological Feature).
		<i>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?</i> We strongly recommend that the Applicant submits a data request to RSPB Scotland for relevant ornithology data which we hold for this area, including Hen Harrier tagging data. A data request should also be made with the South of Scotland Golden Eagle Project (SSGEP) through Restoring Upland Nature (RUN) for their Golden Eagle tagging data. Neighbouring wind farms and afforestation projects will also hold relevant ornithological data for this proposal. We recommend that local records centres (SWSEIC and TWIC) and the Raptor Study Groups are also approached for any relevant data they may hold.	Requests for relevant ornithology data were issued to the RSG, RSPB and SSGEP and the data received has been used to inform the EIA.
	Peat	Other Comments: Section 3.5.3 of the Scoping Report states that “two proposed turbine locations (T3 and T6) are currently located within areas mapped as Class 1 peatland”. Class 1 peatlands have been identified as nationally important areas of priority peatland habitats of high conservation value. Due to the importance of peatland in terms of both habitat and carbon storage, we recommend that Turbines 3 and 6 are relocated to avoid impacts on Class 1 peatlands.	All turbine and infrastructure locations were refined in response to the Stage 2 peat survey data, the details of which are described in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2).

Scottish Rights of Way and Access Society (ScotWays)	24/07/2025	Scotways Recorded Routes	The enclosed map shows that rights of way SL135 and SL164-167, as recorded in CROW, all cross or bound the application site (the Site) as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout. The enclosed map shows that Scottish Hill Tracks (5th edition) SHT(5)058 crosses or bounds the Site as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout. The enclosed map shows that Scottish Hill Tracks (6th edition) SHT(6)058 and SHT(6)058a cross or bound the Site as shown on Figures 1.1 Scoping Report - Site Location and 1.2 Scoping Report – Scoping Layout. South Lanarkshire Council (SLC) Core Path CL/3529/1 Hunt Law Hill –Snarhead coincides with SHT(5)058 and SHT(6)058a. In searching our records at this scoping stage, we have focussed solely on the immediate area of the proposed application. If required by the applicant to inform its Environmental Impact Assessment Report (EIAR), maps of a wider search area are available from the Society, alongside a more detailed response.	The information provided by ScotWays has been used to inform the assessment made with respect to landscape and visual amenity and outdoor access (see Chapter 4: Landscape and Visual Amenity, EIAR Volume 4 and Technical Appendix 9.2, EIAR Volume 4).
		Other access to land	You should be aware that other forms of public access to land may affect the proposed Site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes. In addition to the recorded recreational access routes referred to above that cross or bound the Site, the enclosed map shows that various rights of way, as recorded on CROW, pass in close proximity to the north-east and south-west of the Site. In addition, Heritage Paths (HPs) ‘Roman Road from Moffat to Abington’ and ‘Muirkirk to Wanlockhead Drove Road’ lie between 3km and 1km to the east and south-west of the Site respectively. The Southern Upland Way, a popular long distance recreational route, passes west to east between 1 and 4km to the south-west and south of the Site. Other obvious, defined routes exist adjacent to and within the Site. notably including aspirational SLC Core Paths CL/5701/1 Snar Farm-Leadhills and CL/5690/1 LMC Leadhills to Elvanfoot Dis'd Rlwy. These routes are likely to be used by recreational walkers, cyclists and equestrians, and the applicant should be aware the right of access conferred on the public by Section 1 of the Land Reform (Scotland) Act 2003 (LRSA) is exercisable over them, as well as most, if not all, of the Site (see Comments below).	As above
			We welcome the fact section 3.3.2 of the Scoping Report (the Report) indicates that the Study Area for landscape and visual receptors in the Landscape and Visual Impact Assessment (LVIA) chapter of the applicant’s Environmental Impact Assessment Report (EIAR) will extend to 25km for “Routes and long distance footpaths” and 5km for “Core Paths and Rights of Way”. However, section 3.3.3 Baseline Conditions refers to the Southern Upland and Annandale Ways and National Cycle Route 7, but fails to mention the recorded rights of way, HPs, SHTs and Core Paths referred to above. As such, it appears deficient in failing to take account of the full recreational access baseline. We believe the LVIA should also assess the development’s impact on these routes.	Noted. Potential visual impacts on these routes have been assessed and are presented in Chapter 4: Landscape and Visual Amenity (EIAR Volume 2) and in Technical Appendix 4.4: Visual Assessment (EIAR Volume 4) .
			Although we have no objection to the 15 preliminary viewpoints proposed in Table 3.3.1 of the Report, we consider the list is not sufficiently comprehensive and request specifically the EIAR provides representative wirelines or photomontages, illustrating the impact of the proposed development on views from recreational routes SL135 and SL164/165/167 and SHT(5)058/SHT(6)058, within the Site, as well as from the B7040 public road which bisects the Site	Further consultation with ScotWays has been undertaken in order to agree a final list of LVIA viewpoints to be used for the assessment (consultation letter issued on 27/11/2025). No reply was received from ScotWays. The final viewpoint list is detailed in Chapter 4: Landscape and Visual Amenity (EIAR Volume 2) and in Technical Appendix 4.4: Visual Assessment (EIAR Volume 4) .
		Proximity of Wind Turbines to Public Access Routes	ScotWays understands there is limited guidance on the siting of wind turbines relative to established paths and rights of way, so uses the following principle as the starting point when considering what would constitute a reasonable safeguarding distance between proposed turbines and existing access routes: “a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.” We consider the above represents a reasonable principle to follow when seeking to site turbines safely. ScotWays is likely to object to any proposed layout which does not apply the above principle, including where a micro-siting allowance could lead to turbine encroachment upon a route because it has been insufficiently buffered. In that respect, we request the applicant be required to ensure turbines 7 and 8, as shown on Figure 1.2 Scoping Report – Scoping Layout, are located at least blade tip height safeguarding distance away from routes SHT(5)058/SHT(6)058, and that turbine 5 at O.S. grid reference NS877171 and turbine 26 at grid reference NS913152, as shown on Figure 1.2 Scoping Report – Scoping Layout, are located at least blade tip height safeguarding distance away from the defined routes Priest’s Pool to Leadhills (part of which forms aspirational SLC Core Path CL/5701/1 Snar Farm-Leadhills) and Glengeith to Glen Ea’s Hill (part of which forms aspirational SLC Core Path CL/5690/1 LMC Leadhills to Elvanfoot Dis'd Rlwy) respectively. The requested safeguarding distance should take account of any micro-siting allowance.	Noted. Wherever possible, the design of the Proposed Development avoids Core Paths and other established rights of way; however, as noted, Turbines 7 and 8 of the Proposed Development are proposed within these distances of the Core Path network. The design iteration process described in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) details the constraints that were present in siting the turbines in these locations. Potential adverse effects on paths within the Site would be mitigated in line with measures outlined in Technical Appendix 9.2 Outdoor Access Management Plan (OAMP) (EIAR Volume 4). Any works proposed along and in the vicinity of the Core Paths network and other rights of way would be discussed and agreed with the appropriate SLC Officer(s) prior to works commencing.
		Impact on Existing Public Access Routes	Whilst Figure 1.2 Scoping Report – Scoping Layout suggests the proposed development might have no direct impact on the aforementioned recorded and obvious, defined routes within the Site (provided turbines 7 and 8 are sited more than blade tip height away from routes SHT(5)058/SHT(6)058), the lack of information on other elements of the proposed development, such as the BESS, sub-station, construction compound etc., means no definitive conclusion can be drawn in that regard, at this stage in the process. The applicant should employ appropriate management measures to ensure continuity of public access over the aforementioned, recorded and defined routes within the Site, during the construction, operational and decommissioning phases of the proposed wind farm. In particular, any gates or structures proposed for erection or installation to manage legitimate, non-vehicular, public access or deer movement within or through the Site should be designed to permit access by all user categories (pedestrians, cyclists and equestrians).	Potential adverse effects on paths within the Site would be mitigated in line with measures outlined in Technical Appendix 9.2 Outdoor Access Management Plan (OAMP) (EIAR Volume 4) .
		Access Routes/User Amenity	As well as direct impacts of development upon public access and specific routes, ScotWays is concerned about its indirect impacts on recreational amenity, including the impact of wind farm development on the character of the landscape traversed by access routes, the cultural heritage of such routes and the experience and enjoyment of access users. Consequently, we expect the applicant to take into account both access user amenity and landscape impacts in developing their proposals for the Site. To that end, as stated above, we would expect the EIAR LVIA to provide representative wirelines or photomontages, illustrating the impact of the proposed development on views from routes SL135 and SL164/165/167and SHT(5)058/SHT(6)058, within the Site. In addition, HPs ‘Roman Road from Moffat to Abington’ and ‘Muirkirk to Wanlockhead Drove Road’ should be included in the EIAR’s Cultural Heritage baseline for the “Outer Study Area” and the impact of the proposed development on their cultural heritage value assessed.	These proposed additional LVIA viewpoints have been considered and further consultation with ScotWays (in conjunction with NatureScot and Leadhills Community Council) has been undertaken in order to agree a final list of LVIA viewpoints to be used for the assessment (consultation letter issued on 27/11/2025). No reply was received. The final viewpoint list is detailed in Chapter 4: Landscape and Visual Amenity (EIAR Volume 2) and in Technical Appendix 4.4: Visual Assessment (EIAR Volume 4) .
		Public Access Improvements	In addition to the potential enhancement to public access resources provided by the formation of new, and upgrading of existing, tracks to provide access to the proposed turbines (the extent and location of which the Report provides no detail), the EIAR should explore opportunities to link the Site into the wider public access network, such as the formalisation and way marking of aspirational SLC Core Path CL/5701/1 Snar Farm-Leadhills, at least to the Site boundary north-west of Glendorch.	Potential enhancement of paths and public access within the Site is outlined in Technical Appendix 9.2 Outdoor Access Management Plan (OAMP) (EIAR Volume 4) .
		Cumulative Impact	ScotWays welcomes the fact the applicant intends assessing the cumulative effects of the proposed development with other operational, under construction, consented and within the planning process wind farms within a 15-20km radius of the Site, and that the final list of windfarms assessed will be agreed with statutory consultees (sections 3.3.3 and 3.3.4 and Figure 3.3.3 of the Report refer).	Cumulative impacts are scoped in to technical assessments. Full details of the cumulative developments included are provided in Chapter 4 Landscape and Visual Amenity (EIAR Volume 2) .

		Access Management Plan	We recommend the applicant prepares an Access Management Plan (AMP) for the proposed development, for submission in support of a S.36 application, should the development progress to that stage, and seeks the input of SLC’s Landscape and Access Development Team when preparing the AMP. The AMP should identify all rights of way and other defined paths and tracks through the Site and take account of how the statutory right of access currently affects the Site, showing any areas currently outwith or excluded from statutory access rights under part 1 of the LRSA; and consider the range of users involved (which might include walkers, cyclists, horse riders). It should set out the effect the proposed development will have on the access resources identified, during its construction, operational and decommissioning phases, including showing clearly (preferably in map form) any areas proposed for exclusion from statutory access rights; all paths and tracks proposed for construction, for active travel users; and any diversions of paths - temporary or permanent - proposed for the purposes of the development. An AMP will serve to clarify those areas where access rights will be exercisable and ensure continuity of public access through the site at all stages of the proposed development.	An Outdoor Access Management Plan is provided in Technical Appendix 9.2 (EIAR Volume 4) . It is anticipated that a Final Outdoor Access Management Plan would be secured by condition if Section 36 Consent and Deemed Planning Permission are granted.
		Recreational Routes	Having read the relevant sections of the Report, we are generally content with the proposed methodology of the EIAR, but find it deficient in certain details, as described above. That being said, we are content with the majority of the scope of the EIAR, subject to the following provisos: 1. In the EIAR chapter detailing the Legislative and Policy Context of the proposed development, the applicant should assess the proposed development against the provisions of National Planning Framework 4 (NPF4) Policy 13(b)(viii), which states, “Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they……. Adequately mitigate any impact on local public access routes.”, in addition to the other NPF4 policies referred to in Appendix C of the Report; 2. As well as the various relevant policies of the adopted SLC Local Development Plan 2 (LDP2) and associated planning guidance, the EIAR should also consider the proposed development in the context of SLC LDP3, which is currently in preparation; 3. As mentioned above, we would wish the EIAR to provide representative wirelines or photomontages, illustrating the impact of the proposed development on views from routes SL135 and SL164/165/167and SHT(5)058/SHT(6)058, within the Site, as well as from the B7040 public road which bisects the Site; 4. The EIAR should commit to ensuring, so far as is reasonably practicable, that the aforementioned rights of way and Scottish Hill Tracks, together with the obvious, defined routes within the site referred to above, are kept open and free from obstruction or encroachment during all phases of the development - construction, operational and decommissioning - to maintain public recreational access into and through the Site; and 5. Figure 1.2 Scoping Report – Scoping Layout does not show the proposed location of the BESS or associated infrastructure, such as the proposed Site access, sub-station, turbine access tracks, construction compounds, borrow pits etc. We expect the EIAR to contain that information in detail, to enable consultees, including ScotWays, to submit a fully informed and meaningful response to the S.36 application for the proposed wind farm, if and when it is submitted.	An assessment of the Proposed Development in relation to relevant planning policy, including NPF4, is provided in the separate Planning Statement which accompanies the Section 36 consent application. Visualisations from key viewpoints are presented in Figures 4.18.1 to 4.36.6 within EIAR Volume 3b. The final viewpoints were selected as described in Chapter 4 (EIAR Volume 2) and Technical Appendix 4.4 (EIAR Volume 4). Access to paths/rights of way within the Site would be managed in line with Technical Appendix 9.2 (EIAR Volume 4). The layout of Proposed Development is shown on Figure 2.1 (EIAR Volume 3a) and all aspects of the Proposed Development have been assessed in the EIAR.
Scottish Water	20/06/2025	Hydrology - Water Resource	Scottish Water has no objection to this proposal	Noted.
			A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.	Noted.
			Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals. Development Operations The Bridge Buchanan Gate Business Park Cumbernauld Road Stepps Glasgow G33 6FB Development Operations Freephone Number - 0800 3890379 E-Mail - DevelopmentOperations@scottishwater.co.uk www.scottishwater.co.uk SW Internal General The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response. Written permission must be obtained before any works are started within the area of our apparatus	Noted.
			For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.	No connection request is required.
			All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals	No connection request is required.
Community Councils				

Leadhills Community Council	11/07/2025	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. 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.	Noted. A full description of the consultation process followed has been provided in the Pre-Application Consultation Report that accompanies the Section 36 consent application for 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.	Full details of the Community Benefit Fund are presented in the separate Community Benefit Statement, which accompanies the Section 36 consent application.
		Scope	The Community Council cannot agree that the following topics are scoped out: Population and Human Health; Air Quality and Shadow Flicker	Population is scoped out as a chapter, however a separate Maximising Socio-Economic Benefits Report has been produced and submitted as part of the Section 36 consent application, which focusses on population characteristics, employment and economic activity, industrial structure and tourism. Human Health is scoped out as chapter, however has been assessed as part of standard methodology in relevant chapters (E.g. Noise, Traffic and Visual). Appropriate control measures to ensure potential construction effects on air, noise and water quality have been addressed through Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4). Air Quality is scoped out as a chapter. The main activities that could have potential impacts would be limited to construction works, control measures for which are set out in Technical Appendix 2.1: OCEMP (EIAR Volume 4). Shadow Flicker is scoped out as a chapter, however a technical report is presented in Technical Appendix 1.7: Shadow Flicker Appraisal (EIAR Volume 4) and sets out the predicted shadow flicker effects and where necessary, appropriate mitigation.
		Previous Schemes	No reference of Harryburn Windfarm, which was refused consent on 27/09/19 due to Landscape impacts. 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.	The EIA process has taken due cognisance of the planning history of the Site, in particular the Harryburn wind farm proposal which was refused consent in 2019 (refer to Chapter 1: Introduction, EIAR Volume 2). However, the planning and energy policy framework has materially changed since that decision was taken, with the publishing of the Scottish Government's updated Onshore Wind Policy Statement (OWPS) in December 2022 and the introduction of National Planning Framework 4 (NPF4) in February 2023. These planning documents together with revised Scottish and UK targets relating to onshore wind and emissions reduction targets are new and highly relevant considerations. Moreover, a Design Statement is being prepared, which together with the Planning Statement, makes appropriate references to planning history and the different design approach. The design of the Proposed Development has sought to ensure that all potentially significant environmental impacts are identified and mitigated, such that any residual impacts are considered acceptable. This process, and the assessments made, are fully described in the EIA Report and as noted, other Reports submitted with the application are relevant to the matters raised.

LVIA VPs	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:- <u>Viewpoint at Leadhills</u> • 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. <u>Viewpoint on the B797.</u> • 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 <u>Viewpoints on the B7040.</u> • 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	These proposed additional LVIA viewpoints were considered and further consultation with Leadhills Community Council (in conjunction with NatureScot and ScotWays) was undertaken in order to agree a final list of LVIA viewpoints to be used for the assessment (consultation letter issued on 27/11/2025). No reply was received. The final viewpoint list and rationale are detailed in Chapter 4: Landscape and Visual Amenity (EIAR Volume 4).
LVIA Recreational Paths	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)	This proposed additional LVIA viewpoint was considered and further consultation with Leadhills Community Council (in conjunction with NatureScot and ScotWays) was undertaken in order to agree a final list of LVIA viewpoints to be used for the assessment (consultation letter issued on 27/11/2025). No reply was received. The final viewpoint list and rational are provided in Chapter 4: Landscape and Visual Amenity (EIAR Volume 4).
LVIA Aviation Lights	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 Kenno head 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)	Noted. An assessment of potential impacts of the reduced night-time lighting scheme on surrounding receptors is provided in Technical Appendix 4.6 (EIAR Volume 4).
LVIA Cumulatives	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)	Noted. The cumulative assessment of potential landscape and visual impacts is provided in Technical Appendix 4.5 (EIAR Volume 4).
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.) In relation to CH4 the Community Council is content with the visualisation points proposed.	Noted. The cultural heritage impact assessment is provided in Chapter 5: Cultural Heritage (EIAR Volume 2).
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.	Agreed. Raven Gill SSSI is designated for geological qualifying features and the design has ensured that there would be no potential for impact on this SSSI. Potential impacts have been assessed and are presented in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2).
	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.	Potential effects on GWDTE have been assessed in line with relevant SEPA guidance and presented in Technical Appendix 8.2: Groundwater Dependant Terrestrial Ecosystems (GWDTE) (EIAR Volume 4) and Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2).
	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	Baseline fisheries surveys have been carried out on several watercourses on and around the site by the Clyde River Foundation (CRF); the results are presented in Technical Appendix 6.5: Fish Survey Report (EIAR Volume 4) with the relevant assessment presented in Chapter 6: Ecology (EIAR Volume 2). Any scoping in or scoping out of important ecological features (IEFs), such as fish, in the EIAR has been based upon survey findings and desk-study data which characterises the baseline situation and the professional judgement of the EIA team and experience from other relevant projects and policy guidance or standards. Continued fish monitoring would be included in any consent, as part of a fish monitoring plan (FMP), in line with relevant MD-SEDD guidance. The MD-SEDD checklist is presented in Technical Appendix 6.8 (EIAR Volume 4).
	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 helveticas) It is recommended that these species should be included in the Ecological Impact Assessment	Relevant protected species surveys have been undertaken for the Site, along with a desk-study; the results are presented in Technical Appendix 6.3: Protected Species Survey Report (EIAR Volume 4), results and relevant assessment are presented in Chapter 6: Ecology (EIAR Volume 2) with respective species scoped out or scoped in and assessed as necessary in line with relevant policy, guidance, or standards.
	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 within the Lowther Hills. They were thought to be reservoirs for sheep ticks which were perceived to be a host for the Luping Ill 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. Mountain Hares are particularly vulnerable to disturbance 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)	Relevant protected species surveys have been undertaken for the Site, along with a desk-study. The results are presented in Technical Appendix 6.3: Protected Species Survey Report (EIAR Volume 4), results and relevant assessment are presented in Chapter 6: Ecology (EIAR Volume 2) with respective species scoped out or scoped in and assessed as necessary in line with relevant policy, guidance, or standards. The safeguarding of protected species forms part of Technical Appendix: 6.6 Outline Species Protection Plan (EIAR Volume 4).

Ornithology	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.	NatureScot does not have specific wind farm guidance focused on invertebrates. However, for invertebrates, the General Pre-application and Scoping Advice for Onshore Wind Farms advises that standard mitigation may be sufficient to prevent significant impacts during construction and operation. There is not a mandatory requirement to undertake invertebrate surveys.
	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.	Peatland condition surveys have been undertaken in relevant areas and results presented within Annex D: Peatland Condition Assessment of Technical Appendix 6.2: National Vegetation Classification & Habitats Survey Report (EIAR Volume 4) and accompanying Figure 6.5 (EIAR Volume 3a).
	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. 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	The guidance around SPA connectivity is from NatureScot and it is industry standard to use this guidance to identify whether there is potential for connectivity between an SPA and a site. Connectivity is (correctly) based on known foraging ranges as an SPA will be designated for a specific number of breeding pairs of a species that will then forage either within the SPA or potentially in areas around the SPA. How far a breeding bird will forage from an SPA nest is the key in identifying whether there is a risk to an SPA population from any potential development and so these accepted core foraging ranges that NatureScot have presented are the key.
	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.	As a passerine species, skylark are not generally considered to be at risk from wind farm developments and are not the focus of any surveys. This is covered in the scoping report in the 'matters to be scoped out' section (third bullet point). Ultimately there will continue to be sufficient breeding habitat available for breeding skylark and the Biodiversity Management Plan (BDMP) during construction will ensure nests are safeguarded (as per the Wildlife and Countryside Act), an Outline of the BDMP is presented in Technical Appendix 6.7 (EIAR Volume 4). Much of the skylark decline is linked to lowland habitat changes with changes to farming practices/land use rather than upland habitat changes and the long term Scottish trend shows that after a decline around 2008/9 to 2012/13, the population has been increasing.
	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	The Solway Firth is ~60km from the site and so outwith any connectivity distances for SPAs. In a wider regional context, there is a very slight chance that geese may be overflying the area but given the lack of habitat on or within 20km that is suitable for foraging or roosting geese there is limited reason they would be frequently in flight over the site. Data available from Mitchell regarding foraging areas for pink-footed and greylag goose shows limited data squares within 20km with the nearest one being ~11km away.
	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.	Species assessments take into account all available evidence, including an studies relating to operational monitoring. This is described in Chapter 7: Ornithology (EIAR Volume 2) and accompanying technical appendices.
	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.	The Solway Firth is ~60km from the site and so outwith any connectivity distances for SPAs. Ultimately this risk is negligible and NatureScot have set a clear precedence with goose collisions outwith SPA areas with their guidance relating to pink-footed geese and collision risk (if there is no SPA connectivity they don't require collision modelling). It is acknowledged that golden eagle and red kite are species that have been recorded colliding with wind turbines; however, higher ground clearance is potentially better for birds as most bird flight activity recorded on the site (waders and most hunting raptors/owls) tend to fly comparatively low. Also, at higher altitudes there is an possibility that soaring birds and geese are more likely to be able to alter their flight paths to avoid turbines. Any bird collisions are likely to occur at a level that is not significant to the population in terms of the baseline background mortality. Population modelling shows that these impacts are not significant at a regional level.
	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.	NatureScot provides guidance in relation to the risks to birds from wind turbine aviation lighting, in the form of collision risk modelling guidance, which has been followed in completing the ornithology assessment. Full details are presented in Chapter 7: Ornithology (EIAR Volume 2).
	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.	As part of the Proposed Development, commitments are outlined in Technical Appendix 6.7: Outline Biodiversity Enhancement Management Plan (EIAR Volume 4) to promote raptors and improve habitat for breeding/foraging raptors on the Site.
	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.	Oystercatcher have been recorded during surveys (as a wader species they are considered a target species for surveys). However, as an amber listed wader they are not considered a target species in the context of assessments (in line with NatureScot guidance).
	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.	Curlew are a target species for both surveys and the assessment and were scoped in to the EIA, with breeding wader habitat enhancement also promoted within Technical Appendix 6.7: Outline Biodiversity Enhancement and Management Plan (EIAR Volume 4).

Hydrology	It is noted that the 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.	The geological SSSI has been taken into account during design of the Proposed Development, to ensure that turbines and infrastructure are located at sufficient distance to ensure no impact on the SSSI. This is detailed in Chapter 8: Hydrology, Hydrogeology and Geology (EIAR Volume 2).
	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.	Noted.
	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.	Noted.
	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 Page 10 of 17 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	Noted.
	It is suggested that, as part of the scoping investigations, relevant documents and plans in the Hoptoun 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.	A mining risk assessment study has been produced (Technical Appendix 8.8: Mining Risk Assessment (EIAR Volume 4)) and all relevant documents were reviewed including data sources listed here.
	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.	Noted.
	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.	Noted. These features were identified in Technical Appendix 8.8: Mining Risk Assessment (EIAR Volume 4).
	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.	The proposed site infrastructure has been sited to avoid areas which have medium to high, and ve medium and high risk areas identified in Technical Appendix 8.8: Mining Risk Assessment (EIAR Volume 4), in order to avoid potential effects on the environment and human health.
	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.	The history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) including regular sampling of vegetation, soil and water.
	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.	A detailed assessment of potential flow rates at proposed watercourse crossing locations would be carried out by the contractor at the detailed design stage, such that all of the watercourse crossings identified for the Proposed Development would be designed in compliance with the requirements of The Environmental Authorisations (Scotland) Regulations 2018. The design of watercourse crossings would also take account of the future 'with climate change' baseline and (to avoid altering the flow regime) would be sized for a 1:200 year plus climate change flood event. As such, while a schedule of watercourse crossings is provided in Technical Appendix 8.3: Watercourse Crossing Assessment (EIAR Volume 4), detailed flow rate calculations are not provided within the EIAR.
	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, (i.e.. 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. Tim Mighall, Antonio 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	The history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) including regular sampling of vegetation, soil and water. If required, chemical baseline analysis of soils/peat from legacy mining activities would be undertaken as a condition of any consent. The final CEMP will be prepared in consultation and agreed with SLC, SEPA and other relevant consultees ahead of implementation.

	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. 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. 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. A detailed assessment of peat deposits would also help in determining the carbon balance for the site	The history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (EIAR Volume 4) including regular sampling of vegetation, soil and water. Stage 1 peat survey was undertaken to inform the Scoping exercise and Stage 2 peat survey has been completed in order to inform the final layout. This has ensured that areas of deep peat are avoided. An Outline Peat Management Plan has been prepared for the EIAR and is presented in Technical Appendix 8.6 (EIAR Volume 4), as well as an Outline Biodiversity Enhancement Management Plan (OBEMP) in Technical Appendix 6.7 (EIAR Volume 4). A carbon balance assessment (Technical Appendix 2.4, EIAR Volume 4) has been undertaken to inform the application, which is based on the parameters of the project infrastructure including outputs from the peat surveys, outline peat management plan and peat landslide hazard risk assessment (presented in Technical Appendices 8.5, 8.6 and 8.7 respectively). Outline measures for the management of rock and mineral soils are presented in the outline peat management plan (Technical Appendix 8.6, EIAR Volume 4) and in the borrow pit assessment (Technical Appendix 2.2, EIAR Volume 4). These will be further developed pre-construction (post consent) through preparation of specific detailed management plans including but not limited to Construction Environmental Management Plan and Soils Management Plan (which would be facilitated through a suitably worded planning condition).
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.	Noted. It is not proposed that construction traffic, with the exception of a small number of potential staff trips, would route through Leadhills village.
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 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 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. 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 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.	Preliminary noise modelling has been undertaken in order to inform the final layout of the Proposed Development. A full noise impact assessment is included in Chapter 10: Noise and Vibration (EIAR Volume 2) taking into account baseline noise levels for the different areas considered, including properties in and around Leadhills. The impact of the topography on sound propagation has also been taken into account in accordance with current good practice guidance. The relevant guidance documents refer to residential properties as being particularly noise sensitive and requiring consideration, and includes consideration of impacts outside properties in amenity areas such as gardens. Recreational users such as walkers would be considered of reduced sensitivity due to the transient nature of the noise exposure and as such no significant effects would be expected; therefore no specific assessments of these uses has been undertaken. There is now considerable research showing that wind turbines do not produce high levels of infrasound which would be likely to affect nearby receptors. As noted, the latest available information on this topic is set out as part of the Environmental Noise Assessment in Technical Appendix 10.1 (EIAR, Volume 4). The wording of suitable noise conditions to control operational noise levels will be discussed with South Lanarkshire Council and the ECU. Robust assumptions have been made in relation to potential noise emissions associated with construction of the turbine foundations. It is expected that this would be representative of the potential impacts of decommissioning. Furthermore, this work would be undertaken at relatively large distances from neighbouring noise-sensitive locations. Similar management measures as those in the Construction Environmental Management Plan (CEMP) can be employed and therefore this can be scoped out.
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.	It is understood that the private airstrip referred to here is Crawfordjohn Airfield (Stonehill Farm); impacts on Stonehill Farm airstrip have been scoped out as it lies beyond the 3km consultation distance recommended in CAP764.
Socio-economics	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.	Noted.
Population and 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.	The history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) including regular sampling of vegetation, soil and water, and management processes for excavations and soil disturbance. If required, chemical baseline analysis of soils/peat from legacy mining activities would be undertaken as a condition of any consent.

			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 NHS 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 history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) including regular sampling of vegetation, soil and water, and management processes for excavations and soil disturbance. If required, chemical baseline analysis of soils/peat from legacy mining activities would be undertaken as a condition of any consent.
			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:- Moffat W E. "Blood lead determinants of a population living in a former lead mining area in Southern Scotland." Published in Environmental Geochemistry and Health 1989 11(1): 3-9 Scottish Environmental Protection Agency "Scoping Study on metal contamination in the Glengonnar Water. National Health Public Health Response. Relating to Human Health Risk Assessment of the implications of metal contamination of water sources around Leadhills and Wanlockhead." Published 11 July 2012 by Health Protection Scotland, NHS Dumfries and Galloway and NHS Lanarkshire.	The history of mining in the area and its associated effects are known and would be considered throughout the construction processes. Pre-construction investigations would be carried out in line with relevant SEPA guidance, ensuring construction workers are informed of the risks and follow safe practices including appropriate PPE. Mitigation measures are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) including regular sampling of vegetation, soil and water, and management processes for excavations and soil disturbance. If required, chemical baseline analysis of soils/peat from legacy mining activities would be undertaken as a condition of any consent.
		Ice Throw and Ice Fall	The Community Council notes the comments relating to measures which minimise the risk of ice throw from turbine blades. It is also noted that ice fall from turbines is likely to occur. We can confirm that this is an issue with existing telecommunication and air traffic control structures in the Lowther Hills where hikers have to be aware of this hazard. It has been observed by hikers and fell runners that considerable sized blocks of ice can form and detach themselves	Modern wind turbines are designed to operate such that either ice does not accumulate on blades (through heating of blades during periods of weather where ice accumulation is possible), or if there is ice accumulation the turbine will automatically shut down (sensors on the blades detect ice accumulation and trigger shutdown) and so potential for ice throw from blades is avoided by design. Ice fall from turbines may occur and physical and visual warnings for both site personnel and third parties are also used to alert people to the risk of ice fall in the immediate area under the turbines.
		Air Quality	We would regard air quality as relevant to human health since construction works could lead to heavy metal particles being mobilised into the atmosphere. As such, this topic should not be scoped out.	Air Quality is scoped out as a chapter. The main activities that could have potential impacts would be limited to construction works, control measures for which are set out in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4). The final CEMP will be prepared in consultation, and agreed with, SLC and other relevant consultees.
		Climate Change	Given that a carbon balance assessment of the proposed development will be included in the EIA it is accepted that this topic can be scoped out.	Noted.
		Forestry	We also agree that this topic can be scoped out.	Noted.
		Eskdale Seismic Array	We do not feel competent to comment on this topic.	Noted.
		Telecommunications	Although this is a technical matter, the residents of Leadhills will expect that there will be no deterioration in the quality of television reception within the area and that any technical measures to ensure this is the case will be included within the EIA process.	Noted. A telecommunications impact assessment has been undertaken and is included as Technical Appendix 1.6 (EIAR Volume 4).
		Shadow Flicker	It is noted that shadow flicker is identified in the report as affecting 17 dwellings within ten rotor blade diameters distance of proposed turbine locations and within 130 degrees either side of north of particular turbines. Shadow flicker can cause significant disturbance to those affected. The Community Council would expect that these properties should be identified within the EIA process and appropriate mitigation measures identified, including the resiting or deletion of offending turbines if satisfactory mitigation measures cannot be identified. The Community Council would further expect that, if the proposed development comes to fruition and unacceptable levels of turbine flicker occur, then the shutdown of offending turbines should be conditioned in any consent given. For these reasons we consider that this topic should not be scoped out of the EIA assessment.	Shadow Flicker is scoped out as a chapter, however a technical report is included as Technical Appendix 1.7: Shadow Flicker Appraisal (EIAR Volume 4) which sets out the predicted shadow flicker effects appropriate mitigation.
Post- Scoping				
Consultee Name	Date	Topic	Consultee Comments	Response
Statutory				
Historic Environment Scotland (HES)	05/12/2025	Viewpoints and visualisations for cultural heritage assessment	We note the proposed development has undergone some design revisions which occurred after we provided our scoping response on 17 July 2025. These changes include the reduction in the number of turbines from previously proposed 32 wind turbines to currently proposed 21 wind turbines. We understand that the proposed design revisions have resulted in the lack of visibility of the proposal from some of the heritage assets mentioned in our previous response. These assets are: • SM5385 Glenochar Burn, bastle house, post-medieval settlement & field system • SM4641 Air Cleuch, cairns 1300m S of Glengeith • SM4646 Crookedstane, platform settlement 1300m W of We also note that no third-party viewpoints of cultural significance have been identified by you where these assets would be seen in combination with the proposed development. In terms of the remainder of the heritage assets within our remit, we can confirm that we are broadly satisfied with the viewpoints and types of cultural heritage visualisations as proposed. However, we would request one additional wireline from SM4603 Boghead, platform settlement 500m SW of as a fair number of turbines are expected to be visible within 2km according to the ZTV and there is not another viewpoint sufficiently close. We would suggest that the viewpoint should ideally be from the eastern half of the monument to show the maximum expected impact.	Noted. A wireline from SM4603 has been included in the assessment and is shown on Figure 5.19: Viewpoint 16 (EIAR Volume 3b).
Non-Statutory				

Civil Aviation Authority (CAA)	05/05/2026	Reduced lighting scheme	Thank you for the lighting proposal at reference. The document discusses the proposed obstacle lighting plan for the Ravengill Energy Park Wind Farm, located approximately 1 km to the north of Leadhills village and 1.5 km south of Abington village, with the A74(M) motorway located to the east, in South Lanarkshire. The proposed Ravengill Energy Park Wind Farm consists of 21 turbines, with tip heights up to 220m above ground level, which brings them within scope of the Air Navigation Order (ANO) Article 222 obstacle lighting requirements. We have considered the report carefully and take note of the intent to address concerns relating to adverse visual impacts of aviation lighting on non-aviation receptors while ensuring that the lighting installed on the turbines meets air safety requirements. We note the proposed lighting scheme identifies the perimeter outline and that some mitigation is proposed to be provided by the provision of infra-red lighting for those operators who carry Night Vision Device capability. Under provisions given in the Air Navigation Order (ANO) Article 222 section 6, the CAA provides for the following variation: • medium intensity steady red (2000 candela) lights on the nacelles of turbines T01, T03, T05, T06, T08, T09, T11, T16, T20 and T21; • a second 2000 candela light on the nacelles of the above turbines to act as alternates in the event of a failure of the main light (note that both lights should not be lit at the same time); • the lights on these turbines to be capable of being dimmed to 10% of peak intensity when the lowest visibility as measured at suitable points around the wind farm by visibility measuring devices exceeds 5 km; • infra-red lights to MoD specification installed on the nacelles of turbines T01, T02, T03, T05, T06, T08, T09, T10, T11, T13, T16, T19, T20 and T21 (note that dimming permission is applicable only to visible lights, not infra-red lighting). Intermediate level 32 candela lights are not required to be fitted on the turbine towers. If the proposed design of the wind farm changes (other than variations due to microsites etc.) this is likely to require a revision to this aviation obstacle lighting variation.	This approval is noted and the reduced lighting scheme is reflected in the assessment in the EIAR, in particular Technical Appendix 4.6: Aviation Lighting Assessment (EIAR Volume 4) and Technical Appendix 2.3: Aviation Assessment (EIAR Volume 4).
GateCheck Consultation Responses				
Historic Environment Scotland (HES)	03/03/2026	Gatecheck 1 Response	We are broadly content that the gatecheck report provides a fair record of Historic Environment Scotland’s involvement in this environmental impact assessment. We would like to take this opportunity to note that our scoping response was based on an earlier design iteration of 32 wind turbines with a maximum tip height of 220m, plus associated infrastructure and BESS. We recommend that the applicants consider the EIA Report Guidance provided by Scottish Renewables (https://www.scottishrenewables.com/publications/2096-new-eia-report-guidance).	Noted. The EIAR has been prepared in accordance with Scottish Renewables guidance.
NatureScot (NS)	13/04/2026	Gatecheck 1 Response	Thank you for your consultation in relation to the above and for the additional time to respond. It is helpful to see the design evolution of the proposal since the scoping stage. Based on the information in the Gatecheck Report we have no specific comments to raise at this stage on the proposed approach and methodology to the EIA. We look forward to giving detailed consideration to the proposal when consulted on the application and EIA. It is noted in Appendix 2 that further consultation is underway to agree appropriate locations for night-time viewpoints and visualisations. I am not aware that we have been consulted on this matter to date. I would be grateful if you could confirm whether this consultation has taken place, and if not, advise when it is expected.	Noted. Further consultation was undertaken with NS to agree the final list of LVIA viewpoints, including night-time viewpoints, details of which are contained in Chapter 4 (EIAR Volume 2).
SEPA	11/03/2026	Gatecheck 1 Response	The change to the proposals in terms of layout and in terms of turbine numbers is noted. Based on the information provided, the applicant seems to have taken into account the matters raised in our Scoping Response and has not raised any issues in response to our requirements, we therefore have no specific comments on this consultation. It also appears as though the design has been informed by further peat probing which is welcomed.	Noted.