



**Scottish Government**

**Energy Consents Unit**

**Scoping opinion of behalf of Scottish Ministers under Part 4 of the  
Electricity Works (Environmental Impact Assessment) (Scotland)  
Regulations 2017**

**Issued to SP Energy Networks**

**Proposed 132kV Grid Connection to Lorg and Longburn Wind Farms**

**26 April 2019**

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## 1. Introduction

1.1 On 22 February 2019 SP Energy Networks submitted a formal request to the Scottish Ministers for a scoping opinion in accordance with Regulation 12 in Part 4 of ***the Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017*** (“the Regulations”) in respect of a proposed grid connection for the Lorg and Longburn wind farms (“the proposed Development”). A Scoping Report relating the proposed Development was submitted with the formal request.

1.2 The Lorg and Longburn wind farms are located to the east of Carsphairn in Dumfries and Galloway. The route of the proposed OHL lies between the two wind farms and runs west towards the DE route transmission line forming a junction approximately 3 kilometres north of Carsphairn. The nearest trunk road is the A76(T) which is approximately 18 kilometres to the east of the Lorg Wind Farm. The A77(T) is approximately 38 kilometres to the west of the Longburn Wind Farm

1.3 The proposed Development will comprise:

- a new single circuit 132kV overhead line (“OHL”) approximately 20 kilometres in length supported by trident wooden poles;
- a T-in point (comprising of a switching station) to the 132kV DE route transmission line;
- a junction where the individual connections for the wind farm will meet;
  - the OHL connecting Lorg Wind Farm to the junction will be approximately 8 kilometres in length;
  - the OHL connecting Longburn Wind Farm to the junction will be approximately 12 kilometres in length;
  - an OHL of approximately 10 kilometres will connect the junction to the existing DE Route electricity transmission line.

1.4 There will also be temporary infrastructure including at least one construction compound and areas of temporary hard standing such as lay down areas. There may also be a requirement to construct bellmouths to the public highway where narrow farm tracks are utilised.

1.5 The proposed Development will solely be within the planning authority of Dumfries & Galloway Council.

## 2. Consultation

2.1 Following receipt of the scoping opinion request, a list of consultees was agreed between SP Energy Networks, WSP (consultants to SP Energy Networks) and the Scottish Ministers. A consultation on the contents of the Scoping Report was initiated by the Scottish Ministers on 27 February 2019 with a deadline for responses being 22 March 2019. In response to requests from consultees, this deadline was extended until to 29 March 2019.

2.2 The purpose of the scoping consultation was to obtain advice and guidance from each consultee on environmental matters and methodology to be adopted within their remit. All responses received should be read in full for detailed requirements and for comprehensive advice, guidance and where appropriate, templates for preparation of the EIA Report.

2.3 The consultation received a total of 23 responses. For a list of respondents and copies of their responses see **Annex A**. Each response should be read in full for detailed requirements from individual consultees and for comprehensive advice and guidance and, where appropriate, templates for preparation of the EIA Report.

2.4 Dumfries & Galloway Council submitted a 'part response'. Responses from the Council Roads Officer, the Council Archaeologist and the Council Access Officer were received but none were received, and have yet to be received, from, the Council's Landscape Architect and the Council's Environmental Health Officer. An "attached plan" referred to in the response from the Council's Access Officer was not 'attached' and has been requested but not yet received. In the event that the "attached plan" and responses from the Landscape Architect and the Council's Environmental Health Officer are received by the Scottish Ministers they will be forwarded to all consultees and published on the ECU website as addendums to this Scoping Opinion. This is also applicable to all consultation responses received subsequent to the issue of this Scoping Opinion.

2.5 The following consultees did not submit a response:

Association of Salmon Fishery Boards;  
British Horse Society;  
British Trust for Ornithology Scotland;  
Civil Aviation Authority;  
Dalry Community Council;  
Defence Infrastructure Organisation;  
Dumfries & Galloway Bat Group;  
Dumfries & Galloway Raptor Study Group;  
Game & Wildlife Conservation Trust;  
Glencairn Community Council;  
Glasgow Prestwick Airport;  
Health & Safety Executive;  
JNCC;  
John Muir Trust;  
National Farmers Union;  
National Trust for Scotland;  
Nuclear Safety Directorate (HSE);  
Penpont Community Council;  
Ramblers Association (Scotland);  
Red Squirrels in Scotland (Southeast Scotland);  
Scottish Outdoor Access Network (SOAN);  
Scottish Wildlife Trust;  
Sustrans Scotland;  
The Crown Estate;  
The Woodland Trust;  
Tynron Community Council.

2.6 With regards to those consultees who did not respond, it is assumed that they have no comment to make on the Scoping Report. They will be consulted again when the application for consent is submitted.

2.7 At its request, Glasgow Airport will not be consulted in any subsequent part of the process.

2.8 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Regulations have been met.

### **3. The Scoping Opinion**

3.1 This Scoping Opinion has been adopted by the Scottish Ministers following consultation with Dumfries & Galloway Council as the planning authority in whose area the proposed Development would be situated, SNH, SEPA and Historic Environment Scotland, all as statutory consultation bodies. Other bodies which the Scottish Ministers consider likely to have an interest in the proposed Development by reason of their specific environmental responsibilities or local and regional competencies were also consulted.

3.2 The Scottish Ministers adopt this Scoping Opinion having taken into account the information provided by the Applicant in its request made in February 2019 in respect of the specific characteristics of the proposed Development and the responses received in response to the consultation undertaken. In providing this Scoping Opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed Development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 This Scoping Opinion is, effectively, a collection of the responses received to the consultation request of 27 February 2019. It is issued on behalf of the Scottish Ministers to SP Energy Networks in relation to the proposed Development.

3.4 A copy of this Scoping Opinion has been sent to Dumfries & Galloway Council for transferring to part 1 of the planning register. It has also been uploaded to the Energy Consents Unit portal at [www.energyconsents.scot](http://www.energyconsents.scot)

3.5 The Scottish Ministers are satisfied with the scope of the EIA set out in the Scoping Report and expect that the EIA Report which will accompany the application for consent under section 37 of the Electricity Act 1989 for the proposed Development will include full details showing that all the advice, guidance, concerns and requirements raised by each consultee in the correspondence attached at Annex A to this Scoping Opinion, as being addressed

3.6 With regards to the EIA Report referred to at 3.5, the Scottish Ministers request:

- i. a separate annex to the EIA Report be provided, setting out briefly in tabular form, and with references to the detailed sections of the EIA Report, the likely significant effects of the proposed Development on the factors set out in regulation 4(3) of the Regulations and the features

of the proposed Development or measures envisioned in order to avoid, prevent or reduce any such effects, where applicable; and,

- ii. an annex or some other appropriate reference format showing how each of the issues raised in each response to the scoping consultation have been addressed should also be included in the EIA Report; and,
- iii. locations of groundwater abstractions including all Private Water Supplies which may be impacted by the proposed Development should be provided in the EIA Report along with full details of all assessments of potential impacts conducted, risks identified and mitigation of those risks.

3.7 The Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide the Scottish 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.

3.8 The Scottish 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.

- 3.8.1 With regards to viewpoints, SP Energy Networks should consult with Dumfries & Galloway Council, SNH and Mountaineering Scotland when finalising those to be assessed for the EIA Report.
- 3.8.2 With regards to whether or not to scope out migrating geese and swan species from EIA assessment, SP Energy Networks should have further discussion with RSPB Scotland before a final decision is made.
- 3.8.3 SP Energy Networkss should consult with East Ayrshire Council with regards to assessing the impacts that the proposed Development may have on the Loch Doon SSSI.
- 3.8.4 With regards to assessments of transportation impacts assessment of the proposed Development, SP Energy Networks should consult with Dumfries & Galloway Council's Road Officer and with the Ayrshire Roads Alliance.

#### **4. Mitigation measures**

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of any proposed development on the environment as identified in an environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to

each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

## **5. Conclusion**

5.1 This Scoping Opinion is based on information contained in SP Energy Networks' 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 SP Energy Networks information in connection with an EIA Report submitted in connection with any application for section 37 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 the 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 EIA process is iterative and should inform the final layout and design of proposed developments. The 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 all 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 Applicants are reminded that there will be limited opportunity to materially vary the form and content of proposed developments once an application is submitted.

5.7 It should be noted that in the event that an application for consent under the Electricity Act 1989 is submitted, it is the applicant's responsibility to upload all the application documentation to the Energy Consents Unit's portal. It should be noted that the EIA Report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

**Proposal: CONSULTATION FROM SCOTTISH MINISTERS IN RESPECT OF SCOPING OPINION REQUEST FOR PROPOSED SECTION 37 APPLICATION FOR OVERHEAD POWERLINES**

**Location: Lorg and Longburn Wind Farms, Dumfries and Galloway**

**Application Type: Scoping Opinion**

**Ref. No.: 19/0311/ENQ**

1. This scoping request from the Scottish Government Energy Consent Unit relates to a proposal to construct a new 132kv wood pole overhead line between Lorg and Longburn (subject to appeal) wind farms and a suitable point on the 'DE' route transmission line. The applicant, Scottish Power Energy Networks (SPEN), has a legal duty to provide grid connections under the Electricity Act 1989, and has been approached by the developers of both windfarms to provide a connection into the wider network.

2. The proposed route will initially follow a westerly direction to the bottom of the Water of Ken valley from Lorg, and then south along the Water of Ken valley, running in parallel for the most part with an existing 11kv line through an area of commercial forestry to the Longburn site. The wider area is characterised by a mountainous region to the north and northeast, with Carnsmore of Carsphairn (797m AOD) being the highest. The valleys follow a southerly/south westerly direction joining the lowland valleys of the Water of Deuch, Water of Ken and Kendoon Loch.

3. SPEN have taken the view that an EIA Report will be required for the proposed development due to the nature and scale of the development. The proposed works will be sought under Section 37 of the Electricity Act 1989, with the application being made to the Scottish Government Energy Consents Unit.

4. The Planning Service consulted the following Departments of Dumfries and Galloway Council: Access Officer, Environmental Health Officer, Archaeologist, Roads and Landscape Architect.

To date responses have been received by the following internal consultees:

**5. Council Roads Officer**

5.1 This request for scoping opinion is for the proposed 132kV grid connection to Lorg and Longburn Wind Farms.

5.2 It is noted that the Scoping Report identifies that:

- The proposal is to construct a new 132kV wood pole overhead line (OHL) between the wind farms and a suitable point on the "DE Route" transmission line
- Establishment of temporary infrastructure including construction compound(s) and lay down areas may require construction of bellmouths to the public road
- The construction programme is estimated to last approximately 75 weeks for the OHL and 70 weeks for the switching station

- Levels of traffic associated with the proposal are not expected to exceed the threshold requiring a detailed traffic assessment
- A CTMP will be produced and agreed with the Roads Authority

5.3 Whilst I have no objections in principle to the proposal and have no issues with the proposed assessment scope or methodology outlined in the Scoping Report, I would offer the following observations that should be considered and addressed by any submission/ES: -

- It should be noted that east of the proposed site, the village of Moniaive is located on the A702 at the junction with the B729. This village is characterised by narrow streets that have locally poor horizontal alignment, locally restricted forward visibility, restricted width and have restricted passing opportunities. On the timber haulage Agreed Routes Map the A702 through Dunreggan/Moniaive is identified as an excluded route. Furthermore, the B729 west of Moniaive is restricted in width and geometry and for the purposes of timber haulage, has been identified as a "Severely Restricted" route. It is acknowledged that west of the access to Wether Hill Wind Farm, it was improved with additional passing opportunities for that development and could accommodate HGV and lighter traffic. However, I would not be in favour of any construction traffic accessing this proposed site from the east.
- Any future submission must include details of all works compounds and site access points on public roads
- Proposals for any accommodation works should be supported by swept path tracks.
- All accesses and accommodation works on public roads must be designed and constructed to the satisfaction of the Planning Authority in consultation with the Roads Authority and will require appropriate permits and consents to have been issued and a Legal Agreement covering on-going maintenance and restoration entered into (see note below).
- The developer will be held responsible for the immediate execution of any repairs and will be required to meet the cost of above average maintenance to the public road network arising from the concentration of heavy traffic associated with this development. This to be secured by Legal Agreement.
- It would be appropriate that there should be consultation with nearby forest managers and timber hauliers through the office of the South of Scotland Timber Transport Officer to co-ordinate timber haulage operations that may use the access route during the construction period to minimise the cumulative impact on communities and road users
- Where public road boundaries are altered for the formation of temporary accesses, these should be reinstated in their original position at the conclusion of construction works (unless prior agreements have been secured with the Planning and Road Authorities).
- A Construction Traffic Management Plan (CTMP) should include a programme of all delivery types/numbers by month, details of all proposed mitigation measures, agreed access route and details of measures that will be implemented to ensure that no stacking of delivery vehicles occur on any part of the public road network and is to be agreed in writing with the Police and the Roads Authority prior to any works commencing on site.

- Traffic should take access and egress via an ‘agreed’ route; however, there is likely to be some increase in traffic using other minor roads. There is also the possibility of other unrelated projects being constructed in the vicinity concurrently with this project. Therefore, it would be appropriate that the CTMP acknowledge that co-ordination phasing may be required to mitigate against the cumulative traffic impact.
- The installation of the grid connection will have an impact upon public roads where the route follows a road, crosses a road or crosses a bridge on the road.
- Where an access route crosses bridges and culverts, the applicant will require to get approvals (in respect of those structures) from the Council’s Engineering Services Bridges and Structures Unit.

## 6 Council Archaeologist

6.1 The proposal is for the construction of a 132kV overhead line mounted on wood poles. The proposed route passes eastwards from Holm Hill north-west of Carsphairn, following the valley south of Willieanna and skirting round the north of Quantans Hill and Fumiston Craig before passing through commercial woodland down to the valley of the Water of Ken, where the branch for the proposed Longburn wind farm heads south-east around Round Craigs. The line to Lorg heads up the Water of Ken valley on its eastern side before heading eastwards along the line of the Altry Burn to its terminus on the southern slope of Craigstewart.

6.2 The scoping report includes a section (7.5) on the historic environment and cultural heritage, dealing with the proposed approach for statutory sites, non-statutory sites, a walkover survey that has been undertaken and the potential effects and significance of the proposed development. It then sets out the proposed assessment methodology for an Environmental Impact Assessment, and concludes with a question:

### *Question 5*

*Do you agree with the Cultural Heritage proposed approach for baseline collection, prediction and significance assessment?*

6.3 Having examined the proposals I find them broadly acceptable, with one significant omission. The first elements of the baseline conditions, sections 7.5.2 – 7.5.5 relates to statutory protected sites, and notes that baseline data out to 2km has been used for data collection. This is welcome and agreed.

6.4 The next section, 7.5.6 – 7.5.12 looks at non-statutory sites, and notes that a 100m boundary has been used for these sites, with the exception of regional historic landscape designations for which the 2km study area is used. Historic Environment Scotland acknowledge that not all nationally important sites are scheduled, and have estimated that, at current work rates, it would take at least forty years to look at every potentially schedulable site in the country. As a result of this a number of SMRs/HERs were funded in the late 1990s and early 2000s by Historic Scotland to “initiate a Non Statutory Register (NSR) of archaeological sites likely to meet the criteria for designation as nationally important Scheduled Monuments”. This allowed curators to systematically examine every record held in their SMR/HER, and to

assign significance grades to the historic assets. Dumfries and Galloway Council has maintained the NSR for all records added after the project ended in 2002 and amended categories for sites as new information has come to light.

6.5 The criteria against which we assess monuments of potential national importance are the same as those used by Historic Environment Scotland. Accordingly, I consider that those sites assessed as being of national significance within the Council's HER should also be considered if they fall within the 2km study area, rather than the 100m zone, as indirect effects may affect their setting, particularly if the proposed connector lay within a key viewshed for the monument (as per section 7.5.26).

6.6 It is agreed that the issues proposed for being scoped out of further assessment in sections 7.5.18 and 7.5.19 have been correctly identified.

## 7 Council Access Officer

7.1 The proposed powerline route, linking from Lorg and Longburn windfarms, crosses several paths recorded in our Councils path records. The attached plan shows the locations of recorded Core Paths and recorded Rights of Way affected by the route.

7.2 We would request that the following points are taken into consideration during construction of the powerline:

- During construction of the powerline, disruption to the use of the recorded paths should be kept to a minimum
- Access along the recorded paths should remain available at all times. If there is a requirement to temporarily close a path during the construction, the developer should contact our Councils Countryside Access Officer for advice.
- The developer should ensure that suitable warning notices are in place along the construction route where it crosses a recorded path. The developer is responsible for the health and safety of those using the recorded paths where they cross the construction site and should ensure provision is made for the safe passage of path users.

7.3 We have no objections to the proposed development of the powerline.

## 8 Outstanding Responses

8.1 There are still outstanding responses from the Councils Landscape Architect and Environmental Health Officer which will be forwarded on to the Energy Consents Unit once the Planning Service has received them.

## 9 Other Matters

9.1 The Council considers that the structure of the scoping report is clear and sets out a prudent approach to the topics that may give rise to significant effects and should be fully examined in the forthcoming EIA Report. Additionally, the topics listed in the report are acceptable to the Council and should be fully assessed within the EIA Report.

9.2 Whilst content with the topics and structure of the proposed EIA Report, the Council intends to offer no comments on the proposed questions within the scoping report, with the following exceptions:

**Question 1: What environmental information do you hold or are aware of that will assist in the EIA described here?**

The Council does not hold any further information over and above that listed within the report.

**Question 2: Do you agree with the Landscape and Visual proposed approach for baseline collection, prediction and significance assessment?**

It should be noted that the Council are awaiting a response from the Landscape Architect, but the methodology of the assessment is considered acceptable.

**Question 8: Do you agree that the Noise assessment can be scoped out subject to the stated mitigation measures and assumptions?**

It should be noted that the Council are awaiting a response from the environmental Health Officer. The stated measures are considered acceptable but would not prejudice the Council from investigating any statutory noise nuisance.

From: Paul Atkinson, BT Openreach  
To: Stephen McFadden, Energy Consents Unit  
Date: 27 February 2019

**FW: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

**OUR REF; WID10929 T1-T4**

Dear Sir/Madam,

Thank you for your email dated 27/02/2019.

We have studied the proposed route of the 132kv OHL to the above wind farms, with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.

Kind Regards,

**Paul Atkinson**

**Fibre and Network Delivery**

**Radio Frequency Allocation & Network Protection (BNJ112)**

Openreach

Web: [www.openreach.co.uk](http://www.openreach.co.uk)

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We build and maintain the digital network that enables more than 600 providers to deliver broadband to homes, hospitals, schools and businesses large and small. Our engineers work in every community, every day, because we believe everyone deserves decent and reliable broadband

From: Liz Holmes, Chair – Carsphairn Community Council  
To: Stephen McFadden, Energy Consents Unit  
Date: 21 March 2019

**Re: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

Dear Mr McFadden

please find attached Carsphairn Community Council's response to the scoping opinion request for the grid connection to Lorg and the proposed Longburn wind farms.

Although there are copious references to questions on page numbers in your email of 27 February below, the scoping report we received [both hard copy and on CD] has no numbered pages.

This did not help with making our response which is therefore a more general response with the exception of expressing our deep concerns regarding the placement of part of the route over the area of a scheduled monument or it might be an archeologically sensitive area - it is difficult to ascertain from the map/fig 7.1.

Please acknowledge receipt of our response

Regards

Liz Holmes

Chair

Carsphairn Community Council

**Carsphairn Community Council****20<sup>th</sup> March 2019****ELECTRICITY ACT 1989****THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2000 (AS AMENDED)****SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR A 132  
KILOVOLT GRID CONNECTION TO LORG AND LONGBURN WINDFARMS**

Having studied SP Energy Networks' proposed 132kV Grid Connection to Lorg and Longburn Winds Farms Scoping Report, in line with our stated current policy to evaluate all wind farm and associated grid connection proposals on an individual basis, without favour or prejudice, Carsphairn Community Council are of the opinion that broadly speaking this exhaustive Scoping Report is fit for purpose.

However, we do have a number of reservations and strongly object to the route where the grid connection from the proposed Longburn wind farm starts and where it joins that from the Lorg wind farm.

Although we are unable to comment on much of the report's highly technical content, Carsphairn CC [CCC] are uniquely qualified with respect to a number of local issues, all of which may be said to come under the wider issue of 'cumulative impact' from wind farms and associated infrastructure.

After expressing grave concerns about the Lorg wind farm proposal [now approved], CCC objected to the Longburn wind farm planning application on a number of grounds, including the damaging environmental impact that this industrial development would have on a particularly scenic stretch of the Southern Upland Way. Our concern in particular was that the proposed Longburn site would over-shadow and in places intrude on Dinnans Craig, a much valued and visited scheduled ancient monument.

CCC have no choice other than object to the Lorg/Longburn Grid spur, as shown on the SP Energy Networks map Figure 7.1. The proposed route of the grid connection from the Longburn wind farm runs directly across a site of extraordinarily rich archeological importance, clearly visible in yellow on fig 7.1.

This is also the case where the connection with Lorg meets that of Longburn [though this does not run through the middle of this heritage site but rather it intrudes on the north western area of the site].

This proposed grid connection route from a still contested Longburn Wind farm Connection Point is simply unacceptable to us, for the same reasons we objected to the Longburn wind farm proposal.

Whether the Longburn development goes ahead or not, as currently proposed, this intrusive central power line would undoubtedly degrade and devalue the site of one of Carsphairn's most important cultural heritage assets.

We suggest that whatever the outcome of the Longburn 'argument' [and we hope this wind farm will be finally dismissed] the proposed grid connection should be re-routed to avoid crossing any of the scheduled monument area.

**Economy and Skills**

Depute Chief Executive and Chief Financial Officer  
Alexander McPhee ACMA

Head of Planning and Economic Development: Michael Keane  
REDACTED



**East Ayrshire Council**  
Comhairle Stòrrachd Àir an Ear

Our Ref: INF 2/4

Date: 22<sup>nd</sup> March 2019

Stephen McFadden  
Energy Consents Unit  
5 Atlantic Quay  
150 Broomielaw  
Glasgow G2 8LU

Dear Stephen,

**LORG AND LONGBURN WIND FARMS GRID CONNECTION- RESPONSE TO SCOPING REQUEST FOR PROPOSED SECTION 37 APPLICATION**

Thank you for consulting with East Ayrshire Council on the above request for a scoping opinion.

I note that the scoping request is for the proposed grid connection to Lorg and Longburn Wind Farms comprising a 132 kV overhead line supported on "Trident" wood poles with a T-in point to the electricity transmission network and a junction. The application site is entirely contained within Dumfries and Galloway and is around 6.6km from the East Ayrshire boundary (located at Loch Doon).

East Ayrshire Council has reviewed the scoping report and offers the following comments in respect of the issues pertinent to East Ayrshire.

Landscape and Visual Impact Assessment

In respect of the information submitted, the key area of interest for East Ayrshire Council is the proposed approach to demonstrating the Landscape and Visual Impacts of the proposal. It is noted by the Council that in paragraph 7.2.10 of the report, it is stated that "research on the perceptibility of wood pole overhead lines has shown that they may be visible from up to 6km" and in paragraph 7.2.11 the scoping report states that "the zone of theoretical visibility (ZTV) of the Proposed Development, cut off at 3km from the line". The Council is concerned that the area of Loch Doon (designated as a SSSI), which is around 6km from the proposed development, may be impacted by the proposed development. Therefore, the Council suggest that consideration be given to extending the zone of theoretical visibility to 6km. This would ensure a full assessment of the visual impacts of the proposed development on East Ayrshire.

Transport

The Council advise that Ayrshire Roads Alliance be consulted on the transportation impacts of the proposed development.

The Council has no other comments to make and broadly agrees with the proposed methodology.

Should you require any further information on the points raised above or wish to discuss any matter, then please contact Lorna Clark ~~REDACTED~~  
~~REDACTED~~

Yours Sincerely,

~~REDACTED~~

 Karl Doroszenko  
**DEVELOPMENT PLANNING AND REGENERATION MANAGER**

From: Jamie Ribbens, Galloway Fisherues Trust  
To: Stephen McFadden. Energy Consents Unit  
Date: 15 March 2019

**RE: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

Dear Stephen

Thank you for sending through the details regarding the scoping consultation for the Lorg and Longburn Wind Farm grid connection. Galloway Fisheries Trust (GFT) do wish to provide comment. GFT have a wide experience regarding mitigation measures and impacts on fish populations / water quality associated with construction of new overhead lines. Over the last few years GFT have been providing fisheries advice, expertise and monitoring the SWS powerline construction for SPEN / AMEC.

The Galloway Fisheries Trust (GFT) is a charitable organisation which was formed in 1988, by a number of neighbouring District Salmon Fishery Boards in Dumfries and Galloway. The aim of the GFT is to undertake research, provide advice and complete practical works to protect and enhance aquatic biodiversity, particularly fish species, living in the freshwaters across Dumfries and Galloway. GFT also works on the Scottish side of the Border Esk and the Water of App in south Ayrshire. Further information on GFT can be found on our website [www.gallowayfisheriestrust.org](http://www.gallowayfisheriestrust.org)

GFT are also commenting in this instance on behalf of the River Dee District Salmon Fishery Board (Dee DSFB), within whose jurisdictional area this proposed development lies.

GFT agree that an EIA is required for this Proposed Development. There is potential for the ecology and water quality of surrounding water courses to be impacted by the proposed construction which includes temporary hard standing, access tracks, temporary water crossings and upgrading existing tracks.

GFT comments:

5.2.1 – GFT support the need to have good quality baseline data included in the EIA Report.

6.2.1 – GFT are supportive that protection of the water environment (NE11) and water margins (NE12) have been highlighted in the report.

If water courses are found to contain fish then it will be important to undertake fish rescues to remove fish from the immediate work area. Work such as culvert placement or placement of bank protection may require fish rescues to be undertaken.

Question 1: the proposed route cuts through many watercourses which are expected to support important fish populations, particularly trout. GFT do hold various electrofishing data for the upper reaches of the Dee catchment which shows this area is important for fisheries but it will be important to have specific recent fish data for each significant water course within the development area.

Question 2: GFT do not have the expertise to answer this question.

Question 3: GFT would agree that various water courses present within the site will be expected to support sensitive fish populations and potentially could support a freshwater pearl mussel population. GFT supports the proposal that freshwater pearl mussel surveys will be undertaken at crossing points where suitable habitat exists. GFT supports the proposed discussions on fish which are to be held with GFT, including consideration of any required baseline surveys. Any baseline fish surveys undertaken should follow recognised standards and training as detailed by the Scottish Fisheries Co-ordination Centre (SFCC). GFT are experienced in delivering fish and pearl mussel surveys and have regularly completed both in the upper Dee catchment and will be available to discuss with the developer what could be undertaken. GFT also supports the use of 'habitat suitable for salmonids and freshwater pearl mussel' as a sensitive ecological receptor. Under the section Potential significant effects (7.3.13), GFT supports that 'damage and disturbance to aquatic and riparian habitats and species..' and 'obstructions to migrating fish and disturbance to spawning areas....' have been included.

Question 4: GFT do not have the expertise to answer this question

Question 5: GFT do not have the expertise to answer this question

Question 6: This section correctly states the large number of water courses crossed (20 waters) which could potentially have their water quality impacted. The presence of North American signal crayfish in the catchment and the need for suitable biosecurity measures is mentioned which is good but it is incorrect to focus solely on the risk of moving crayfish eggs as the greatest risk actually comes from the movement of juvenile and adult crayfish not eggs. Under Potential effects and significance, GFT supports that pollution, soil erosion / compaction and the loss of peatland are all highlighted. GFT supports the suggestion that a peat management plan will be produced. GFT is concerned about the proposal of scoping out the North American signal crayfish risk as the document does not seem clear or correct regarding the risks from crayfish movement as it only mentions the risk of moving eggs.

Question 7: GFT do not have the expertise to answer this question

Question 8: GFT do not have the expertise to answer this question

Question: GFT agree with the proposals.

Please contact me if you need any further clarifications on the points raised in this consultation response.

Regards  
Jamie

**Jamie Ribbens BSc (Hons) MSc**  
*Senior Fisheries Biologist*

From: Glasgow Airport Limited  
To: Stephen McFadden, Energy Consents Unit

Date: 04 March 2019

**RE: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

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

Regards  
Kirsteen



**GLASGOW  
AIRPORT**  
PROUD TO SERVE SCOTLAND

**Kirsteen MacDonald**  
Safeguarding Manager

Glasgow Airport Limited, Erskine Court, St Andrews Drive, Paisley PA3 2TJ

[glasgowairport.com](http://glasgowairport.com)

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Table 1 - Summary of Questions	
Question Number	Question
1	Question 1: What environmental information do you hold or are aware of that will assist in the EIA described here? <b>Glasgow Prestwick Airport Ltd (GPA) hold no environmental information that would assist in this EIA.</b>
2	Question 2: Do you agree with the Landscape and Visual proposed approach for baseline collection, prediction and significance assessment? <b>GPA agree with the proposed approach.</b>
3	Question 3: Do you agree with the Ecology and Nature Conservation proposed approach for baseline collection, prediction and significance assessment? <b>GPA agree with the proposed approach</b>
4	Question 4: Do you agree with the Ornithology proposed approach for baseline collection, prediction and significance assessment? <b>GPA agree with the proposed approach</b>
5	Question 5: Do you agree with the Cultural Heritage proposed approach for baseline collection, prediction and significance assessment? <b>GPA agree with the proposed approach</b>
6	Question 6: Do you agree with the Hydrology, Hydrogeology and Peat proposed approach for baseline collection, prediction and significance assessment? <b>GPA agree with the proposed approach</b>
7	Question 7: Do you agree that the Traffic and Transport assessment can be scoped out subject to the provision of a Construction Traffic Management Plan? <b>GPA agree with the proposed approach</b>
8	Question 8: Do you agree that the Noise assessment can be scoped out subject to the stated mitigation measures and assumptions? <b>GPA agree with the proposed approach</b>
9	Question 9: Do you agree that the following topics can be scoped out subject to the stated mitigation measures and assumptions: <ul style="list-style-type: none"><li>• Land use</li><li>• Recreation and tourism</li><li>• Major accidents and disasters</li><li>• Climate change</li><li>• Air quality</li><li>• Population and human health</li><li>• Material assets</li><li>• Electric and magnetic fields</li><li>• Radio and TV interference</li><li>• Waste</li></ul> <b>GPA agree with the proposed approach</b>
10	Question 10: Are there any key issues or possible effects which have been omitted? <b>GPA Response: No</b>
11	Question 11: Of those issues identified for assessment, which do you consider the most important/material and which the least? <b>GPA makes no comment on this question</b>



By email: [econsents\\_admin@gov.scot](mailto:econsents_admin@gov.scot)

Stephen McFadden  
Energy Consents Unit  
4th Floor, 5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300036125

18 March 2019

Dear Mr McFadden

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
Lorg and Longburn Wind Farms Grid Connection  
Scoping Report

Thank you for your consultation which we received on 27 February 2019 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

### Proposed Development

I understand that the proposed development comprises a 132 kV overhead line supported on 'Trident' wood poles with a T-in point to the electricity transmission network (DE Route) and a junction where the individual connections from Lorg and Longburn Wind Farms meet.

### Scope of assessment

We are content that the scoping report identifies the potentially significant impacts for our interests. We therefore have no more specific advice to offer on specific heritage asset to be considered at this stage. We would be happy to comment on the level of impact as further assessment is undertaken.



We would also welcome the opportunity to comment on any draft supporting materials before the full application is submitted. We note that no details are provided at this stage in relation to visualisations for our interests. It would be helpful to agree this with the applicant before the full assessment is undertaken.

We welcome the fact that the relevant policy and guidance is referred to for our interests. We consider that the key guidance in this instance is likely to be our [Managing Change guidance note on 'Setting'](#). The methodology for the assessment of setting impacts should make close reference to this document.

We note that currently only impacts where heritage assets have direct visibility of the development will be assessed for setting impacts. We advise that this be broadened to consider impacts where heritage assets may be captured in the same view as the development, even where there is not direct inter-visibility.

One of the considerations identified in the report for assessing significance of effect is the 'integrity' of the asset. We would not consider this relevant in assessing setting impacts. We would also advise that in relation to scheduled monuments, the degree of survival is taken into account in the designation process. Scheduled monuments should be considered of national importance, regardless of their condition.

The scoping report appears to consider 'above ground assets' as a distinct consideration from any buried archaeology. We would recommend that all known and particularly all designated heritage assets should be considered in terms of setting impacts and contribution to the wider archaeological landscape.

### Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes). Technical advice is available on our Technical Conservation website at <http://conservation.historic-scotland.gov.uk/>. We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron REDACTED  
REDACTED

Yours sincerely

**Historic Environment Scotland**

From: Joint Radio Company  
 To: Stephen McFadden, Energy Consents Unit  
 Date: 27 February 2019

**Lorg and Longburn wind farms Grid Connection - Scoping Consultation [WF308181]**

Dear stephen,

A Windfarms Team member has replied to your coordination request, reference **WF308181** with the following response:

*Dear Sir/Madam,*

**Site Name:** *Lorg and Longburn Wind Farms, Carsphairn, Dumfries & Galloway*

**Scope:** *HV grid connection (OHV 132kV line) to Lorg and Longburn Wind Farms*

**Connection Points:**

*Grid Connection: Holm Hill, Carsphairn OSGB 254730 595590\**

*Lorg Connection: OSGB 267730 599760\**

*Longburn Connection: OSGB 264990 592990\**

*\* all positions are estimated*

**Turbine at NGR:** *n/a*

**Hub Height:** *n/a* **Rotor Radius:** *n/a*

*This proposal \*cleared\* with respect to radio link infrastructure operated by **Scottish Power and Scotia Gas Networks***

*JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.*

*In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above).*

*In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.*

*It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.*

*JRC offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.*

*Regards*

*Wind Farm Team*

*The Joint Radio Company Limited  
Delta House  
175-177 Borough High Street  
LONDON  
SE1 1HR  
United Kingdom*

*Office: 020 7706 5199*

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.  
Registered in England & Wales: 2990041  
<http://www.jrc.co.uk/about-us>*

From: Dr Emily Bridcut, Marine Science Scotland  
To: Stephen McFadden, ECU  
Date: 11 March 2019

**RE: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

Hi Stephen,

Thank you for seeking comment from MSS on the scoping report for the proposed Lorg and Longburn wind farms OHL in relation to freshwater and diadromous fish and fisheries.

We advise that the developer consults our generic scoping and monitoring guidelines prior to carrying out the Environmental Impact Assessment (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>).

We recommend that the developer contacts, if not already done so, the River Dee (Kirkcudbright) District Salmon Fishery Board for information regarding local fish stocks.

If you require any further information please do not hesitate to ask.

Kind regards,  
Emily



**Mountaineering  
Scotland**

The Granary  
West Mill Street  
Perth PH1 5QP  
Tel: 01738 493 942

By email to [stephen.mcfadden@gov.scot](mailto:stephen.mcfadden@gov.scot)

Stephen McFadden  
Energy Consents Unit  
4th Floor  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

19 March 2019

Dear Mr McFadden

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)  
REGULATIONS 2000 (AS AMENDED)**

**SCOPING OPINION REQUEST FOR PROPOSED SECTION 37 APPLICATION FOR A 132  
KILOVOLT GRID CONNECTION TO LORG AND LONGBURN WINDFARMS**

Thank you for the opportunity to comment on the proposed windfarm grid connection.

Our interest lies with visibility for hillwalkers on and from their way to Cairnsmore of Carsphairn. In the Landscape and Visual Impact Assessment the consultant identifies Viewpoints 2 and 4 as important for walker as visual receptors, along with Viewpoint 3 to give a wider landscape view. We agree with these viewpoints.

We welcome the statement to maintain access along the paths to Cairnsmore of Carsphairn during construction work.

The EIA states, in regard to Cairnsmore of Carsphairn, that "the overhead line is unlikely to be visible from the summit itself". We request that an additional viewpoint from the summit of the Corbett be included if a significant impact is recorded from any of Viewpoints 2, 3 or 4.

We hope that you find these comments helpful in your consideration of the proposal.

Yours sincerely  
REDACTED

**Davie Black  
Access & Conservation Officer  
Mountaineering Scotland**

From: NATS Safeguarding  
To: Stephen McFadden, Energy Consents Unit  
Date: 14 March 2019

**RE: Lorg and Longburn wind farms Grid Connection - Scoping Consultation  
[Our Ref: SG27669]**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

**NATS**

NATS Safeguarding

From: RAF  
To: Stephen McFadden, Energy Consents Unit  
Date: 28 February 2019

**20190228-REPLY Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

Good Morning Stephen,

I have looked at our map and there are no concerns with this application.

Regards

Moira

Moira Wilson  
RSP Safeguarding  
e-mail DESADEWS-RSPSafeguarding(MULTIUSER)@mod.gov.uk  
RAF Henlow



**RSPB Scotland**

Stephen McFadden  
Consents Manager  
Energy Consents Unit  
The Scottish Government

13 March 2019

**ELECTRICITY ACT 1989  
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)  
REGULATIONS 2000 (AS AMENDED)**

**SCOPING OPINION REQUEST FOR PROPOSED SECTION 37 APPLICATION FOR A 132  
KILOVOLT GRID CONNECTION TO LORG AND LONGBURN WINDFARMS**

Thank you for consulting RSPB Scotland on the Scoping report for this development. Our comments follow relating to specific questions raised in the accompanying Appendices.

Yours sincerely,

Julia Gallagher  
Conservation Officer – Dumfries and Galloway

**Dumfries & Galloway Office**  
The Old School  
Crossmichael  
Castle Douglas  
Kirkcudbrightshire  
DG7 3AP

Tel 01556 670 464  
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[rspb.org.uk](http://rspb.org.uk)



**APPENDIX 1 RSPB Scotland – response to Scoping questions and additional comments****Question 3: Do you agree with the Ecology and Nature Conservation proposed approach for baseline collection, prediction and significance assessment? Question**

7.3.7 We note the presence of sensitive habitats including Annex 1 habitats identified through survey work. We therefore, agree with the inclusion of sensitive habitats as receptors (7.3.10) and we advise that impact to deep peat habitat is avoided through design specification. In relation to this we would advise that any mitigation for these habitats considers the additional potential impact to black grouse hens (nesting habitat) which are likely to be intersected by proposed infrastructure (see below)

**4: Do you agree with the Ornithology proposed approach for baseline collection, prediction and significance assessment**

*7.4.2 Base line condition:* We note that it is stated that no correspondence was received from RSPB Scotland. However, we responded by letter in response to consultation for routing options making recommendations on the scope of survey work and recommending contacts for species data requests, including the RSPB and the D&G Raptor study group to inform this proposal (20/06/2017). A copy of this letter is attached as the second Appendix.

7.4.8 As stated in our previous response we support the inclusion of target species summarised in this report and we note that results of survey work has confirmed the presence of these species on site which includes black grouse, red kite and curlew.

7.4.10 Although we note that migrating geese and swan species has been scoped out of assessment due to low numbers recorded during standard survey work, we maintain our advice that these species should be maintained in scope due to flight data provided by WWT which indicates that this line is in direct route of migrating Greenland white-fronted geese and whooper swans. This advice was included in our response to Routing consultation.

We would advise that mitigation measures relating to nesting black grouse is considered as part of the design process and in relation to construction works, which should include pre-construction surveys for nesting black grouse.

## APPENDIX 2 RSPB Scotland's letter (comments on consultation for routing options)

Sarah McMonagle  
 Land and Planning Team  
 SP Energy Networks  
 3<sup>rd</sup> Floor, Ochil House,  
 10 Technology Avenue  
 Hamilton International Technology Park  
 Blantyre  
 G72 0HT

20 June 2017

Dear Sarah,

### **Lorg and Longburn Wind farms Grid Connection – Consultation on Preferred route**

Thank you for consulting RSPB Scotland on the preferred route for this project. We have looked at the Routing Consultation Report and we have the following comments to make.

#### **Preferred route**

##### Ornithology

While we do not have significant concerns regarding the preferred route option (A1, B4, C4) we do have some recommendations with regard to bird species which may be at risk from a power line structure in this area and which should therefore, be given full consideration for mitigation measures to minimise impact as appropriate.

We agree with the inclusion of black grouse, nightjar, breeding raptors, breeding waders and red kite as ornithological features within the route (Table 5.4) and which should therefore, be given consideration through survey work and impact assessment as part of the Environmental Impact Assessment (EIA). In support of this we can confirm that our records confirm breeding red kite 600m south of the preferred route and as such survey work and assessment needs to consider potential impact to this species and appropriate mitigation measures to off-set any impact. We can also confirm that although we do not have records of black grouse within the preferred route option area boundary this area is located within a strategic corridor for the Dumfries and Galloway black grouse population and we therefore, agree that full assessment needs to be given through survey work and impact assessment as part of the EIA. While we do not have specific data on breeding waders, nightjar or raptor species we agree that these species should be included in survey work and the impact assessment process.

In addition, we are aware of data on migrating wildfowl in this area for Whooper swans and Greenland white-fronted geese from tracking work undertaken by the Wildfowl and Wetlands Trust (WWT). We would therefore, advise that assessment of potential impact to birds includes migrating wildfowl.

##### Deep Peat

We note that areas of peat habitat are located within the preferred route option area. We would like to highlight the need to ensure that areas of deep peat habitat (>45cm) are avoided through design layout.

##### Data Search

In support of our comments above regarding assessment of impact to ornithology, we would advise that you contact WWT for data on migrating wildfowl ([Larry.Griffin@wwt.org.uk](mailto:Larry.Griffin@wwt.org.uk)) and the RSPB for records of red kite nest sites ([Julia.gallagher@rspb.org.uk](mailto:Julia.gallagher@rspb.org.uk)). We also recommend that a data search request is made with the Dumfries and Galloway Raptor Study Group ([Chris.rollie@rspb.org.uk](mailto:Chris.rollie@rspb.org.uk)).

We hope that our comments have been useful.

Kind regards,

Julia Gallagher  
Conservation Officer – Dumfries and Galloway



19/03/2019

Stephen McFadden  
Energy Consents Unit,  
4th Floor,  
5 Atlantic Quay,  
150 Broomielaw,  
Glasgow  
G2 8LU

Scottish Badgers  
Hillhead Farmhouse  
North Mains of Kinnettles  
Forfar  
Angus  
DD8 1XF

Lorg and Longburn Wind Farms Grid Connection

Your Application Ref: ECU00001789

Dear Stephen,

As badgers have already been identified as using the site (7.3.8), it would be prudent to ensure further surveys are undertaken to ensure all setts within the construction footprint are accounted for, including those found within areas of forestry that may be considered for felling as part of the project. This should be undertaken by a suitably qualified persons, and considerations should be given to licensing requirements. Consideration should be made for access routes, equipment storage areas and the use of artificial lighting on site if applicable.

The time of year for surveying should ideally cover different seasons; during winter months badger activity is at a minimum, and therefore results for this time of year often do not reflect the true usage of a territory by a badger clan. Likewise, during February, females are giving birth, and are therefore at their most sensitive to disturbance. Any construction work near a possible badger sett during this time of year should ideally be avoided where possible.

Yours sincerely,

Emily Platt  
Operations Coordinator  
E: [operationscoordinator@scottishbadgers.org.uk](mailto:operationscoordinator@scottishbadgers.org.uk)  
W: [www.scottishbadgers.org.uk](http://www.scottishbadgers.org.uk)

## FC Scotland Scoping Opinion

### Forestry and Woodlands

Scotland's forests make a substantial contribution to the economy at both national and local levels, they provide considerable environmental benefits and help to improve people's quality of life. The Scottish Government aims to maintain and enhance Scotland's forest and woodland resources for the benefit of current and future generations. To achieve this, we need to prevent inappropriate woodland losses (Scotland's Forestry Strategy, 2019).

The third [National Planning Framework](#) also recognises that Scotland's woodlands and forestry are an economic resource, as well as an environmental asset. The [Climate Change Plan](#) places emphasis on the fact that Scotland's woodlands deliver a wide range of benefits, including inward investment and jobs, climate change adaptation and mitigation, and the enhancement of the health and well-being of Scotland's communities. The Scottish forestry sector is worth almost £1 billion per year and employs over 25,000 people.

There is therefore a strong presumption in favour of protecting Scotland's woodland resources and the Scottish Government provides policy direction in the [policy on control of woodland removal](#). Woodland removal should be kept to a minimum and where woodland is felled it should be replanted. The policy supports woodland removal only where it would achieve significant and clearly defined additional public benefits. In some cases, including those associated with development, a proposal for compensatory planting may form part of this balance. The criteria for determining the acceptability of woodland removal is explained in the policy and the applicant should take them into account when preparing the proposal. Beyond this, the applicant should refer to guidance documents issued by Forestry Commission (FC) in relation to good forestry practice and sustainable forest management.

### Woodland Management and tree felling

Where woodland removal is proposed for development, the relevant Environmental Impact Assessment (EIA) regulations will apply and the EIA Report should justify and provide evidence for the need for woodland removal and the associated mitigation measures. **The first consideration for the applicant should be whether the underlying purpose of the proposal can reasonably be met without resorting to woodland removal.** Design approaches that reduce the scale of felling required to facilitate the development must be considered and integration of the development with the existing woodland structure is a key part of the consenting process.

Integration of the project into future forest design plans is a key part of the development process. **The removal of large areas of woodland will not be supported.** When a proposed development or infrastructure requires to go through forestry, consideration should be given to [forest design guidelines](#).

The EIA Report should include a stand-alone chapter on 'Woodland management and tree felling' (a forest plan) prepared by a suitably qualified professional and supported by existing records, site surveys and aerial photographs. In order to present the relevant information about the forest and to secure compliance with

the UK Forestry Standard, the applicant should consider the appropriate scope/scale for such plan. In certain cases a forest plan of the proposed development area only is not appropriate. The applicant should consider the whole ownership, or multiple ownerships, or expands the scope of the forest plan so that to present the relevant information about that forest. Details of the proposed mitigation measures must be included in the EIA Report, not left to post-consent habitat management plans (or others) to decide and implement.

The chapter should describe and recognise the social, economic and environmental values of the forest and the woodland habitat and take into account the fact that, once mature, the forest would have been managed into a subsequent rotation, often through a restructuring (re-designing) proposal, according to the UK Forestry Standard, that would have increased the diversity of tree species and the landscape design of the forest.

The chapter should describe the baseline conditions of the forest, including its ownership. This will include information on species composition, age class structure, yield class and other relevant crop information. The chapter should describe the changes to the forest structure, the woodland composition and describe the work programme:

- the proposed areas of woodland for felling to accommodate the proposed infrastructures, including access roads, tracks, underground pipes and cables and any ancillary structures. Details of the area to be cleared around those structures should also be provided, along with evidence to support the proposed scale and phasing of felling;
- trees felled must be replanted on-site or compensated for (off-site planting) and these areas must be clearly identified in the plan. On-site replanting must always be considered first. The replanting operations must be appropriately described, including changes to the species composition, age class structure, timber production and traffic movements. Tree/shrub species must be suited to the site and the objectives of management;
- areas of open ground in the forest that are designed for biodiversity or landscape enhancement or for recreation opportunities should not be considered for on-site replanting (to compensate for woodland removal in other parts of the forest).

The applicant should consider the potential cumulative impact of existing and the proposed development on the forest resource in respect to the local and regional context. In particular consideration must be given to the implication of felling operations on such things as habitat connectivity, biodiversity, water management, landscape impact, impact on timber transport network and forestry policies included in the local and regional Forestry and Woodland Strategies and local development plans.

A long term forest plan should be provided as part of the EIA Report (as a technical appendix for context) to give a strategic vision to deliver environmental and social benefits through sustainable forest management and describes the major forest operations over a 20 years period.

**UK Forestry Standard**

The [UK Forestry Standard](#) is the Government's reference standard for sustainable forest management in the UK and provides a basis for regulation and monitoring. The Scottish Government expects all forestry plans and operations in Scotland to comply with the standards. Both felling operations and on and off-site compensatory planting must be carried out in accordance to good forestry practice- the EIA Report must clearly state that the project will be developed and implemented in accordance with the standard. A key component of this is to ensure that even-age woodlands are progressively restructured in a sustainable manner: felling coupes should be phased to meet adjacency requirements and their size should be of a scale which is appropriate in the context of the surrounding woodland environment.

**FC Scotland**

FC Scotland works as part of Scottish Government to protect and expand Scotland's forests and woodlands and so has an interest in major developments that have the potential to impact on local forests and woodlands and/or the forestry sector. From 1st of April 2019 FC Scotland will be transferring into a new agency of Scottish Government called Scottish Forestry.

FC Scotland is the main forestry consultee and should be consulted throughout the development of the proposal to ensure that proposed changes to the woodland are appropriate and address the requirements of policy on control of woodland removal and the principles of sustainable forest management.

It is important that pre-application discussions takes place with the local FC Scotland [Conservancy office](#), the planning authority and other relevant key agencies, at the earliest possible stage of the project, to ensure all parties have a shared understanding of the nature of the proposed development, information requirements and the likely timescale for determination. This collaborative approach will ensure that all forestry issues are identified and mitigated at the earliest opportunity. The applicant should allow sufficient time in their project plan to accommodate such advice.

**FC Scotland**  
**February 2019**

8<sup>th</sup> March 2019

The Scottish Government  
Energy Consents Unit 5 Antlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU



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

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

Dear Stephen McFadden

**DG7 Dumfries Lorg and Longburn Site At**  
**PLANNING APPLICATION NUMBER: ECU00001789**  
**OUR REFERENCE: 773766**  
**PROPOSAL: Overhead Power Line (OHL >15 < 50km Section 37 EIA)**

**Please quote our reference in all future correspondence**

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

**Drinking Water Protected Areas**

A review of our records indicates that the proposed activity falls within two drinking water catchments where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. The Carsfad catchment supplies Lochinvar Water Treatment Works (WTW) and Benloch Burn supplies Carsphairn Water Treatment Works (WTW) it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number 0800 0778 778.

The site lies close to the intake for Benloch Burn so travel times of any pollution event will be short and we would deem this to be high risk.

Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at [www.scottishwater.co.uk/slm](http://www.scottishwater.co.uk/slm).

We welcome that reference has been made to the Scottish Water drinking water catchment.

The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions.

We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity.

We would also like to take the opportunity, to request that in advance of any works commencing on site, Scottish Water is notified at [protectdwsources@scottishwater.co.uk](mailto:protectdwsources@scottishwater.co.uk). This will enable us to be aware of activities in the catchment and to determine if a site meeting would be appropriate and beneficial.

Yours sincerely

**Angela Allison**  
REDACTED

From: Eleisha Fahy, ScotWays  
To: Stephen McFadden, Energy Consents Unit  
Date: 29 March 2019

**RE: Lorg and Longburn wind farms Grid Connection - Scoping Consultation**

Good afternoon Stephen,

With regret I have to say that despite my best intentions, we have not found capacity to submit comments regarding the scoping for the proposed Lorg and Longburn wind farms' grid connection.

If in due course, SP Energy Networks think it will be of value to approach us directly for a consultation response regarding public access, we will be pleased to hear from them as we may be in a better position to comment at that time.

Thanks again for your helpful extension to time, it was appreciated even though we have been unable to take advantage of it on this occasion.

Kind regards,  
Eleisha

Our ref: PCS/164116  
 Your ref:

Stephen McFadden  
 The Scottish Government  
 Energy Consents Unit  
 Glasgow

If telephoning ask for:  
 Alex Candlish

21 March 2019

By email only to: [Stephen.McFadden@gov.scot](mailto:Stephen.McFadden@gov.scot)

Dear Mr McFadden

**Electricity Act 1989**

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations**

**2000 (As Amended)**

**Scoping Opinion Request For Proposed Section 37 Application For A 132 Kilovolt Grid Connection To Lorg And Longburn Windfarms**

Thank you for consulting SEPA on the Scoping Report for the above development proposal by your email received on 27 February 2019.

All issues relevant to SEPA's remit appear to be scoped in. In response to SPEN's request to answer the questions within the Scoping Report we have outlined further information requests in the Appendix below. Notwithstanding this to **avoid delay and potential objection**, the information outlined in the attached appendix must be submitted in support of any application.

**Regulatory advice for the applicant**

**1. Regulatory requirements**

- 1.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 1.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 1.3 A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from a construction site, including access tracks, which:



Chairman  
 Bob Downes  
 Chief Executive  
 Terry A'Hearn

**Angus Smith Building**

6 Parklands Avenue, Eurocentral,  
 Holytown, North Lanarkshire ML1 4WQ  
 tel 01698 839000 fax 01698 738155  
[www.sepa.org.uk](http://www.sepa.org.uk) • customer enquiries 03000 99 66 99

- is more than 4 hectares,
- is in excess of 5km, or
- includes an area of more than 1 hectare or length of more than 500m on ground with a slope in excess of 25°

See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.

- 1.4 Below these thresholds you will need to comply with [CAR General Binding Rule 10](#) which requires, amongst other things, that all reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment. The detail of how this is achieved may be required through a planning condition.
- 1.5 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at:

SEPA Dumfries  
 Rivers House  
 Lochside Industrial Estate  
 Irongray Road  
 Dumfries  
 DG2 0JE  
 Tel: 01387 720 502

If you have queries relating to this letter, please contact me by e-mail at [planning.infrastructure@sepa.org.uk](mailto:planning.infrastructure@sepa.org.uk).

Yours sincerely

Alex Candlish  
 Senior Planning Officer  
 Planning Service

*Disclaimer*

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

## Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

### 1. Site layout

1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground.

### 2. Engineering activities which may have adverse effects on the water environment

2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:

- a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
- b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.
- c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

2.3 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\)](#) [Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

### 3. Disturbance and re-use of excavated peat and other carbon rich soils

3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO<sub>2</sub> to the atmosphere. Developments must aim to minimise this release."

3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO<sub>2</sub> and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.

3.3 The submission must include:

- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
- b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.

3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).

3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.

3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

### 4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

4.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

## 5. Existing groundwater abstractions

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

## 6. Forest removal and forest waste

6.1 Key holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.

6.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:

- a) A map demarcating the areas to be subject to different felling techniques.
- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

## 7. Borrow pits

7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.

7.2 In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.
- b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
- c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
- e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
- f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
- g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
- h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO<sub>2</sub>.
- i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

## 8. Pollution prevention and environmental management

8.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention \(GPPs\)](#).



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**  
**nature.scot**

Stephen McFadden  
 The Scottish Government  
 Energy Consents Unit  
 4th Floor  
 Atlantic Quay  
 150 Broomielaw  
 Glasgow  
 G2 8LU

Date: 21 March 2019  
 Our ref: CPA154486  
 Your ref: ECU00001789

Dear Mr McFadden

**Electricity Act 1989**  
**The Electricity Works (Environmental Impact assessment) (Scotland) Regulations 2000 (As Amended)**

**Scoping opinion request for proposed Section 37 application for a 132 kilovolt grid connection to Lorg and Longburn Wind Farms**

Thank you for consulting us on the above. Please find, as requested, answers to questions in the Scoping Report that are relevant to our organisational remit.

**Question 1**

*What environmental information do you hold or are aware of that will assist in the EIA described here?*

**Answer 1**

Section 7.3 of the report details protected/sensitive areas that have been identified as part of the desk study using our Site Link facility. We do not hold any information over and above that which is available on our website.

**Question 2**

*Do you agree with the Landscape and Visual proposed approach for baseline collection, predication and significance assessment?*

**Answer 2**

We are satisfied with the proposed approach for baseline collection, predication and significance. Viewpoints appear appropriate and the methodology employs a range of relevant guidance material and publications.

**Scottish Natural Heritage, Holmpark Industrial Estate, New Galloway Road, Newton Stewart, Wigtownshire, DG8 6BF**

**Tel: 01671 404700**

**www.nature.scot**

**Dualchas Nàdair na h-Alba, Ionad Gníomhachais Holmpark , Rathad Ghall-Ghàidhealaibh Nuaidh, Baile Ùr nan Stiùbhartach, DG8 6BF**

**Fòn: 01671 404700**

**www.nature.scot**

**Question 3**

*Do you agree with the Ecology and Nature Conservation proposed approach for baseline collection, prediction and significance assessment?*

We are happy with approach taken so far and the proposed additional work to be undertaken for assessing impacts on ecology and nature conservation. We will make more detailed comments, where appropriate, at the formal application stage.

**Question 4**

*Do you agree with the Ornithology proposed approach for baseline collection, prediction and significance assessment?*

As with ecology, we are content that the proposed approach for baseline collection, predication and significance assessment is appropriate, using up to date guidance and publications. Previous advice given to the applicant in respect of existing ornithological data remains relevant.

**Question 6**

*Do you agree with the Hydrology, Hydrogeology and Peat proposed approach for baseline collection, prediction and significance assessment?*

**Question 10:** Are there any key issues or possible effects which have been omitted?

The report appears to cover all aspects of assessing impacts on habitats, species and landscape features for which we would expect to be considered in this wider countryside development.

If you have any comments or questions regarding any of the above, please do not hesitate to contact me at this office.

Yours sincerely,

John Gibson  
Operations Officer  
Southern Scotland  
REDACTED



# The Coal Authority

Resolving the **impacts** of mining

**A42**  
260 Lichfield Lane  
Mansfield  
Nottinghamshire  
NG18 4RG  
T: 01623 637 119  
E: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
[www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

Mr Stephen McFadden - Consents Manager: Energy Consents Unit  
Scottish Government

**[By email: [Stephen.McFadden@gov.scot](mailto:Stephen.McFadden@gov.scot)]**

05 March 2019

Dear Mr McFadden

Your reference: ECU00001789

**ELECTRICITY ACT 1989**  
**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)**  
**REGULATIONS 2000 (AS AMENDED)**

**SCOPING OPINION REQUEST FOR PROPOSED SECTION 37 APPLICATION FOR A 132 KILOVOLT GRID CONNECTION TO LORG AND LONGBURN WINDFARMS**

Thank you for your notification of 27 February 2019 seeking the views of the Coal Authority on the above.

I have checked the site location plan (Figure 2.1-Proposed Route) against the information held by the Coal Authority and can confirm that the proposed development site is located outside of the defined coalfield. Accordingly, I can confirm that the Coal Authority has no comments or observations to make on this proposal.

In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the Project. This letter can be used as evidence for the legal and procedural consultation requirements.

Yours sincerely

REDACTED

Deb Roberts *M.Sc. MRTPI*  
Planning Manager

Stephen McFadden  
Energy Consents Unit  
The Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Your ref:  
ECU00001789

Our ref:  
TS00538

Date:  
15/03/2019

[econsentsadmin@gov.scot](mailto:econsentsadmin@gov.scot)

Dear Sirs,

**ELECTRICITY ACT 1989 - THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000 (AS AMENDED)**

**SCOPING OPINION REQUEST FOR PROPOSED SECTION 37 APPLICATION FOR A 132 KILOVOLT GRID CONNECTION TO LORG AND LONGBURN WINDFARMS**

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

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

**Proposed Development**

We understand that SPEN has been approached by the developers for Lorg and Longburn Wind Farms to provide a grid connection to the wider electricity transmission network and, as such, SPEN is proposing to construct a new 132kv wood pole overhead line (OHL) between the wind farms and a suitable point on the 'DE' Route transmission line. The wind farms are located to the east of Carsphairn in Dumfries and Galloway, with the nearest trunk road being the A76(T) approximately 18km to the east of Lorg windfarm. The A77(T) lies approximately 38km to the west of Longburn windfarm.

The route of the OHL lies between the two windfarms, then west towards the 'DE' Route transmission line, forming a junction approximately 3km north of Carsphairn.

Both the OHL line and the windfarms are remote from the trunk road network.

## Traffic and Transport

Chapter 7.7 of the Scoping Report indicates that the level of trips generated by the construction of the OHL will not breach the thresholds identified in the Institute of Environmental Management and Assessment (IEMA) Guidelines on the local roads surrounding the OHL. It is clear, therefore, that the level of generated construction traffic will have even less of an impact on the trunk road network which is further from the OHL.

Having reviewed the supporting documentation, Transport Scotland is satisfied that the proposed OHL will not give rise to any significant environmental impacts on the trunk road network, and has no objection to the proposed grid connection. No further information is required in this regard.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office REDACTED  
REDACTED

Yours faithfully

REDACTED

**John McDonald**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

14 March 2019

Stephen McFadden  
Consents Manager  
Energy Consents Unit  
The Scottish Government

Dear Mr McFadden,

**Proposed Overhead line connection for Lorg and Longburn wind farms, Dumfries & Galloway**

Thank you for giving VisitScotland the opportunity to comment on the above wind farm development.

Our response focuses on the crucial importance of tourism to Scotland's local and national economy, and of the natural landscape for visitors.

Background Information

VisitScotland, as Scotland's National Tourism Organisation, has a strategic role to develop Scottish tourism in order to get the maximum economic benefit for the country. It exists to support the development of the tourism industry in Scotland and to market Scotland as a quality destination.

While VisitScotland understands and appreciates the importance of renewable energy, tourism is crucial to Scotland's economic and cultural well-being. It sustains a great diversity of businesses throughout the country. According to a recent independent report by Deloitte, tourism generates £11 billion for the economy and employs over 200,000 - 9% of the Scottish workforce. Tourism provides jobs in the private sector and stimulates the regeneration of urban and rural areas.

One of the Scottish Government and VisitScotland's key ambitions is to grow tourism revenues and make Scotland one of the world's foremost tourist destinations. This ambition is now common currency in both public and private sectors in Scotland, and the expectations of businesses on the ground have been raised as to how they might contribute to and benefit from such growth.

Importance of scenery to tourism

Scenery and the natural environment have become the two most important factors for visitors in recent years when choosing a holiday location.

The importance of this element to tourism in Scotland cannot be underestimated. The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product: a large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling, wildlife watching and visiting historic sites.

The VisitScotland Visitor Experience Survey (2015/16) confirms the basis of this argument with its ranking of the key factors influencing visitors when choosing Scotland as a holiday location. In this study, over half of visitors rated scenery and the natural environment as the main reason for visiting Scotland. Full details of the Visitor Experience Survey can be found on the organisation's corporate website, here:

<http://www.visitscotland.org/pdf/Revised%20Oct%202012%20%20Insights%20Wind%20Farm%20Topic%20Paper.pdf>

#### Taking tourism considerations into account

We would suggest that full consideration is also given to the Scottish Government's 2008 research on the impact of wind farms on tourism. In its report, you can find recommendations for planning authorities which could help to minimise any negative effects of wind farms on the tourism industry. The report also highlights a request, as part of the planning process, to provide a tourism impact statement as part of the Environmental Impact Analysis. Planning authorities should also consider the following factors to ensure that any adverse local impacts on tourism are minimised:

- The number of tourists travelling past en route elsewhere
- The views from accommodation in the area
- The relative scale of tourism impact i.e. local and national
- The potential positives associated with the development
- The views of tourist organisations, i.e. local tourist businesses or VisitScotland

#### Conclusion

Given the aforementioned importance of Scottish tourism to the economy, and of Scotland's landscape in attracting visitors to Scotland, VisitScotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full. This includes when taking decisions over turbine height and number.

VisitScotland strongly agrees with the advice of the Scottish Government –the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.

VisitScotland would also urge consideration of the specific concerns raised above relating to the impact any perceived proliferation of developments may have on the local tourism industry, and therefore the local economy.

We hope this response is helpful to you.

Yours sincerely  
REDACTED

Douglas Keith  
Government & Parliamentary Affairs  
VisitScotland