



# AEI Technical Appendix 14.2: Letter to ScotWays

# **Euchanhead Renewable Energy Development AEI**

## ScottishPower Renewables UK Ltd

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SLR Project No.: 405.00481.00052

15 July 2025

Revision: 01



01 February 2021

Lynda L Grant Scottish Rights of Way and Access Society (ScotWays) 24 Annandale Street Edinburgh EH7 4AN info@scotways.com

Our Ref: 405.00481.00052

Your Ref: N/A

Dear Lynda

RE: THE ELECTRICITY ACT 1989 APPLICATION REFERENCE ECU00002141 PROPOSED EUCHANHEAD RENEWABLE ENERGY DEVELOPMENT

We write in reference to your consultation response dated 06 January 2021 in respect of the above.

### **Recording of Paths**

We have interrogated the information shown on Figure 14.1 and acknowledge that the detail shown at this scale does not clearly show the position of the core paths and rights of way due to the scale of the figure produced and the number of overlapping paths present in this area. We believe this does not affect the description of the baseline in the text or the assessment undertaken as all routes in the area have been assessed.

#### Impacts on the Southern Upland Way (SUW).

SPR notes Scotway's comments regarding the standoff distances to the SUW and reference to Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8) - Proximity to Highways and Railways.

SPR has been working with the Southern Upland Way rangers throughout the development of this project to ensure impacts are minimised and suitable alternative routes are in place during construction. An example of this is the commitment to construct an additional recreational route that would be maintained for the lifetime of the project, which is shown by the blue dashed line in Figure 14.2.

The main section of the SUW with which Scotways has identified concerns is close to turbines 12, 13 and 15, which are located 110m, 180m and 165m from the SUW respectively. In addition, Turbine 14 is located 135m from path DS244. The section of the SUW through the Polskeoch forest block and part of the Shinnelhead forest block is already shared with the core timber haul route known as the Heads of the Valleys Road (see Chapter 2, Section 2.2.1), which is the primary access road for forestry purposes. Users of the SUW are therefore accustomed to operational forestry traffic, as noted in Section 14.5.3. The visual impact of the proximity of certain turbines on recreational use of the SUW (including cumulative effects) is assessed in Chapter 7: Landscape and Visual Impact and Chapter 14, Section 14.5.4. and found to be not significant.



Once construction of the development is complete, service and maintenance vehicles will use the existing forestry tracks and new access tracks to traverse the site. These movements will be infrequent and predominantly be by light goods vehicles and 4x4s.

SPR is committed to improving access to and the maintenance of large sections of the SUW. This is evidenced through the construction of Kilgallioch Windfarm where SPR undertook 4.5 km of upgrade works on the SUW. Furthermore, this windfarm contributes £50,000 every year of its operational life to Dumfries and Galloway Council towards the employment of two rangers to promote, manage and maintain the SUW across the region, including ancillary routes and associated services. This includes the section of the SUW that passes through Euchanhead Renewable Energy Development. For the proposed Development, SPR is committed to offering a package of community benefit and enhancements which could be utilised to further benefit the SUW.

As described in Section 14.5.3, the proposed Development provides for walkers and other recreational users of the SUW to have use of an alternative route around the western boundary of the Site that would provide more open views. Similarly, the proposed changes to the Polskeoch forest block's felling plan and felling and restructuring of the forest coupes (see Technical Appendix 3.2) associated with the proposed Development would open up the views from parts of the SUW (in particular the area around Allan's Cairn) across the hills to the northeast / east of the Euchanhead development, which would provide a varied set of views compared to the current enclosed forest block along this section of the SUW.

We trust that above addresses the concerns raised in your consultation response. Representatives of the project team would be pleased to have a video call with you to discuss this letter with you further if that would be of assistance.

Yours sincerely **SLR Consulting Limited** 

**Tim Doggett** Associate EIA Project Manager

Cc Mark Ashton ECU