



Technical Appendix 2.3

Further Consultation

Table of contents

Consultee Correspondence	3
Arqiva	3
ATKINS	3
Dumfries and Galloway Council	4
Dumfries and Galloway Council – Archaeology Service	4
Dumfries and Galloway Council – Environmental Health Officer	5
Historic Environment Scotland	5
NatureScot	6
NATS Safeguarding	8
Royal Society for the Protection of Birds Scotland	9
Scottish Environment Protection Agency	9



Consultee Correspondence

Arqiva

Chapter 13: Other Issues – Radio Transmission Links

28 September 2020

Re: WSP - Wind farm coordinates

Dear [REDACTED]

Response by Arqiva

Thank you for the opportunity to review and comment on the above development.

Arqiva is responsible for providing the BBC, ITV and the majority of the UK's radio transmission network and is responsible for ensuring the integrity of Re-Broadcast Links. Tall infrastructure such as wind turbines and other tall structures have the potential to block radio transmission links and rebroadcasting links (through direct blocking of radio signal or deflecting signal). Our radio transmission networks normally operate with a 100m buffer either side of a radio link, free from interference by tall development.

We have considered whether this development is likely to have an adverse effect on our operations and have concluded that we have no objections to this development.

If you would like to discuss this matter further, please do make contact. My email details are windfarms@arqiva.com

Yours faithfully

[REDACTED]
Arqiva
[REDACTED]

ATKINS

Chapter 13: Other Issues – Telecommunication Links

From: Windfarms <windfarms@atkinsglobal.com>

Sent: 27 September 2020 17:22

To: [REDACTED]

Subject: WF33365 - Dumfries and Galloway, Scotland, T1-T8 - NY 01280 92103: WSP - wind farm coordinates

Dear Sirs,

I am responding to an email of 14-09-2020, regarding the above named proposed development.

The above application has now been examined in relation to UHF Radio Scanning Telemetry communications used by our Client in that region and we are happy to inform you that we have **NO OBJECTION** to your proposal.

Please note that this is **not** in relation to any Microwave Links operated by Scottish Water

Atkins Limited is responsible for providing Wind Farm/Turbine support services to TAUWI.

Atkins Limited is responsible for providing Wind Farm/Turbine support services to the Telecommunications Association of the UK Water Industry. Web: www.tauwi.co.uk

Windfarm Support

ATKINS

The official engineering design services provider
for the London 2012 Olympic and Paralympic Games

Web: www.atkinsglobal.com/communications

Dumfries and Galloway Council

Chapter 5: Landscape and Visual – Cumulative Developments

From: [REDACTED]
Sent: Friday, November 6, 2020 4:23 PM
To: [REDACTED]
Subject: RE: EXTERNAL: FW: Harestanes South (20/0582/ENQ): D&GC Scoping response
[OFFICIAL](#)

Afternoon [REDACTED]

I'll let you know if there are any further LVIA comments asap, I'm chatting to our landscape architect next week and I'll find out then.

I spoke with my Team Leader about the Beeswing/Kessock wind farm and this is a very old scheme that hasn't been relevant for over 10 years so I'd say you really don't need to include it in the cumulative assessment.

Kind regards,

[REDACTED]

[REDACTED]

Senior Planner | (Major Development)

Dumfries & Galloway Council

Dumfries and Galloway Council – Archaeology Service

Chapter 10: Archaeology and Cultural Heritage – Study Area

From: [REDACTED]
Sent: 16 March 2020 16:02
To: [REDACTED]
Subject: RE: EXTERNAL: Heritage Data Request

[OFFICIAL](#)

Hello [REDACTED]

Yes, it would be possible to send you all the data for that study area, but I would be sending you a lot of unnecessary records that you would then have to spend a significant amount of time going through and filtering. A quick check of the HER indicates that at least 2110 records lie within your search area.

Given that this looks remarkably like a windfarm, though you may well not be able to confirm that due to commercial confidentiality, I would advise you that direct effects will need to be assessed for the footprint and access routes, with a 1km buffer being the norm for data requests.

An assessment of indirect effects will be required for all regionally significant assets out to 5km in cases such as burial cairns, hillforts and commemorative monuments where their landscape setting is one of their key characteristics, as well as Grade B or C Listed Buildings within 5km.

Promoted and nationally significant sites, including those assessed by the Council's archaeology service as meeting the criteria for scheduling even if they are not actually designated; A-Listed Buildings, larger landscape designations, such as Designed Landscapes (including non-Inventory ones), Conservation Areas and Archaeologically Sensitive Areas should be assessed if they fall within 10km of the footprint.

If this is the case then I would recommend a more tailored HER search, for which a shapefile of the footprint would be necessary.

Kind regards

[REDACTED]

[REDACTED]
Archaeologist
Dumfries and Galloway Council
Economy & Development
Kirkbank House, English Street
Dumfries, DG1 2HS

[REDACTED]

Dumfries and Galloway Council – Environmental Health Officer

Chapter 9: Noise – Scope of Assessment

From: [REDACTED]
Sent: 02 November 2020 12:38
To: [REDACTED]
Subject: FW: EXTERNAL: Harestanes South Windfarm Extension - Noise Consultation

OFFICIAL

Further to your correspondence I confirm that I have no significant objections to your proposals with respect to your email of 8th September 2020 at 16:53.

I agree that the requirement for a Construction Noise Method Statement can be removed on the basis that there remains a robust complaint procedure in terms of noise put in place during the project.

I agree that the Cumulative assessment is based on viable Wind Farm projects only and as such as per the information provided in your email I have no significant objection to Blackwood Windfarm, Auchenshew Windfarm and Duncow Windfarm being removed from the Cumulative Assessment.

I agree with the noise sensitive receptors selected and noise monitoring locations and further agree that Auchenshew Cottage can be scoped-out of the assessment work as per provided photograph this is clearly not a habitable property.

Kind regards

[REDACTED]
(Environmental Health Officer)

Environmental Health (Safety Services)
Safe and Healthy Communities
Council Offices
Buccleuch Street
Dumfries
DG1 2AD

Historic Environment Scotland

Chapter 10: Archaeology and Cultural Heritage – Final Design

From: [REDACTED]
Sent: 21 October 2020 10:39
To: [REDACTED]
Subject: RE: Case ID 300044479 - Harestanes South Windfarm Extension

Good morning,

Having checked the revised layout and ZTV, we are of the view that the revised scheme does not alter the validity of our original Scoping comments.

The turbines that have been removed from the revised design are those furthest away from the assets for our interests in the vicinity.
There has also been no obvious change to the proposed access route and other site infrastructure.

Scheduled monuments

The same monuments still need to be assessed for impacts in the same ways.

GDLs and Category A listed buildings

The same GDLs and A-listed buildings still need to be assessed for impacts in the same ways. On assessment of the submitted ZTV, it also appeared that the following additional Category A-listed buildings may be intervisible with the wind farm and we therefore recommend that the following 3 A-listed buildings should also be assessed.

- **Amisfield Tower** (LB17233)
- **Elshieshields Tower and Adjoining House, Walled Garden and Gatepiers at South** (LB9970)
- **Ross Mains** (LB10353)

We hope this is helpful,

Kind Regards,

[REDACTED] | **Senior Casework Officer | Heritage Directorate**

We inform and enable good decision-making so that the historic environment of Scotland is valued and protected.

Historic Environment Scotland | Àrainneachd Eachdraidheil Alba
Longmore House, Salisbury Place, Edinburgh EH9 1SH

NatureScot

Chapter 5: Landscape and Visual – Night Time Lighting and Wild Land Area

[REDACTED]

By email

Our ref: CEA159245

4 June 2020

Dear [REDACTED]

Harestanes South Wind Farm Extension – night time lighting and Wild Land Area

Thank you for your very helpful memo (dated 13 May) relating to nighttime lighting, ZTV, and Wild Land Assessment for the Harestanes South wind farm extension.

This follow-up relates to our previous Scoping response and discussions held via teleconference on May 7, where we raised the potential for landscape and visual impacts, including potential impacts on the Talla – Hart Fell Wild Land Area (WLA).

We have considered the potential visibility of the wind farm from the WLA using the information provided, and note that that the ZTV indicates visibility of the turbines from recreational routes within the WLA. We therefore still think that is appropriate to provide a single dusk/dawn viewpoint from within the WLA, given there are potential impacts on this nationally important designation. We believe that to use a suitable viewpoint from within that particular WLA for both the Wild Land Assessment and for the night time lighting visualisation is a proportionate approach.

Please note these comments are given without prejudice to any further comments we may wish to make regarding this development proposal.

Please don't hesitate to contact me to discuss this response if you think that might be useful.

Yours sincerely

By e-mail

[REDACTED]

Chapter 5: Landscape and Visual – Viewpoint from Hart Fell

From: [REDACTED]
Sent: 04 August 2020 16:31
To: [REDACTED]
Cc: [REDACTED]
Subject: Harestanes South - LVIA Viewpoints update - SNH response

Dear [REDACTED]

Thank you for your email (22nd July) and the attached documentation regarding the revised turbine layout, VPs, and ZTV from the updated Harestanes South extension.

Unfortunately we must decline the meeting suggested. However, In our previous response and in the VC meeting we highlighted that we were particularly keen to have a VP from Hart Fell, and this has now been included (VP15), so thank you for that. Given this inclusion we are content with the viewpoints included and approach taken in the documentation provided, and we look forward to the landscape and lighting assessments.

If there is anything else in particular concerning this development you would like our comments on as the design nears completion, please feel free to forward it to me.

Kind regards

[REDACTED]

[REDACTED] **Operations Officer | Forth and Southern Scotland Areas**

[REDACTED]

Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: 01738 457066
Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphìn | Dùn Èideann | EH12 7AT
or
Anderson's Chambers | Market Street | Galashiels | TD1 3AF | t: 01738 457066
Dualchas Nàdair na h-Alba | Seòmraichean Anderson | Sràid a' Mhargaidh | Galashiels | TD1 3AF

Chapter 8: Ornithology – Survey

From: [REDACTED]
Sent: 04 August 2020 15:11
To: [REDACTED]
Cc: [REDACTED]
Subject: Interim Ornithological Technical Report - Harestanes South extension

Dear [REDACTED]

Thanks for your e-mail (July 30th) and the Interim Ornithological Technical Report.

I have read through the document and I agree with the case presented by WSP that a single year of bird survey is appropriate for this site, noting the reasoning for this conclusion in the report:

- There is good recent and historic bird survey data available for the site, which has been used to inform the report
- The site is of generally low sensitivity for birds since it is largely a commercial conifer plantation, and it has no appreciable impacts on national and international designated sites (SSSI, Ramsar, and Natura)
- The data gathered by the year 1 survey (2018/19) is consistent with the recent and historic data available.

A second year of bird survey work is not likely to make a significant contribution to what is already known about this site.

Kind regards

[REDACTED]

[REDACTED] Operations Officer | Forth and Southern Scotland Areas

Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: 01738 457066
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[nature.scot](https://www.nature.scot) – *Connecting People and Nature in Scotland* – [@nature_scot](https://twitter.com/nature_scot)

Chapter 5: Landscape and Visual – Aviation Lighting

From: [REDACTED]
Sent: 04 November 2020 16:21
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Harestanes South Windfarm Extension - LVIA

Hello [REDACTED]

Great timing. I have had a brief discussion with Anne and Paul Taylor (one of our specialist RECA's, who you may know as well) this afternoon at almost the same time as your email arrived.

We are agreed that provided your assessment of potential impacts of aviation lighting on all the relevant landscape and visual receptors is clearly presented in the EIA Report, this does not, in this case, need to rigidly stick to the format in the recently updated guidance, as I believe you did much of your work prior to its update. So it is understandable that this submission may not perfectly accord with the new guidance wrt LVIA.

Of course we would expect future work, which has time to adapt to the revised guidance, to be in line with it; and if it is not, to provide a thorough rationale for why it does not.

I trust this helps.

Kind regards

[REDACTED]

[REDACTED] Area Officer | Forth and Southern Scotland Areas

Silvan House | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: 01738 457066
Dualchas Nàdair na h-Alba | Taigh Silvan | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT
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[nature.scot](https://www.nature.scot) | [@nature_scot](https://twitter.com/nature_scot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

NATS Safeguarding

Chapter 13: Other Issues – Impacts on Radar

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 27 July 2020 14:41
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Harestanes South Windfarm Extension (SG09361): Revised Turbine coordinates OBJECTION
Attachments: SG09361 TOPA Issue 3.pdf

Dear Sarah

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc **objects to the proposal**. The reasons for NATS's objection are outlined in the attached report TOPA SG09361 Issue 3.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries please contact us using the details below.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on Lowther Hill Radar

Using the theory as described in Appendix A and turbine specific propagation profiles it has been determined that the terrain screening available will not adequately attenuate the signal for turbines 12 and 14 and therefore these turbines are likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.2. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Engineering	Unacceptable
Prestwick ATC	Unacceptable

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

5. Conclusions

5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

Royal Society for the Protection of Birds Scotland

Chapter 8: Ornithology – Survey

[REDACTED]

WSP
7 Lochside View
Edinburgh Park,
Edinburgh
EH12 9DH

13/08/2020

Dear [REDACTED]

Harestanes Wind Farm Extension (South) Interim Bird Report.

Thank you for consulting RSPB Scotland with regards to the acceptability of a single years' worth of survey work for the above-referenced wind farm application.

We are in agreement with yourselves and SNH that a years' worth of survey work is sufficient to inform an environmental impact assessment for this proposal for the following reasons:

- Recent and historical bird survey data is available which is consistent with the data gathered in the year 1 survey. These data have been used to inform the report.
- The habitats present on site are generally thought to hold low ornithological interest.
- It appears that this development will not significantly impact any designated sites, although our final judgement on this is reserved until the full environmental impact assessment is received.

Therefore, it is unlikely that a second years' worth of survey work will significantly change what is already known about the site.

Yours sincerely,

[REDACTED]

Conservation Officer – Scottish Lowlands and Southern Uplands

[REDACTED]

Scottish Environment Protection Agency

Chapter 6: Hydrology, Geology and Soils – Pre-application Advice



Buidheann Dion
Àrainneachd na h-Alba

Our ref: PCS/172934
Your ref:

If emailing, please mark
[REDACTED]

2 October 2020

[REDACTED]
WSP UK Ltd
7 Lochside View
Edinburgh Park
Edinburgh, EH12 9DH

By email only to: [REDACTED]

Dear Sir

Pre-planning enquiry Request for scoping opinion for proposed Section 36 application Harestanes South Wind Farm

Thank you for your consultation email which SEPA received on 8 September 2020. We have previously provided comments regarding this proposal (our refs: PCS/171044, dated 13 May 2020 and PCS/171991, dated 20 July 2020) and we recommend that this letter is read in conjunction with our earlier correspondence.

We welcome pre-application engagement, but please note that our advice at this stage is based on emerging proposals and we cannot rule out potential further information requests as the project develops. We ask that the following issues are addressed prior to the submission of a planning application to avoid unnecessary delay and/or objection from us.

1. Drainage

- 1.1 Our comments with regard to foul drainage remain unaltered from our previous responses.
- 1.2 With regard to surface water drainage, we would like to provide some further clarification about the level of detail required by the full application stage. In our most recent response (PCS/171991), we stated that: "it would be essential to provide a detailed surface water drainage plan as part of the planning application, consequently it would not be acceptable from SEPA's perspective to submit this part of the application post-submission. We would be likely to object on the grounds of lack of information on surface water drainage, if a detailed surface water drainage plan was not submitted as part of the planning application."
- 1.3 Whilst we acknowledge that it may not be possible (at the full application stage) to provide a drainage plan with every single detail of the surface water drainage system to be applied on the site, in order to assess the proposal at the application stage, we would need to see maps showing the proposed development infrastructure in context with the water environment (watercourses, tributaries, lochs, drains, GWDTEs), which demonstrate that relevant buffers have been adhered to, pollution pathways considered and ecologically sensitive areas avoided.



Chairman
Bob Downes

Chief Executive
Terry A'Hearn

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- 1.4 Justification would be required for any instances where standard buffer distances would not be met, including details of mitigation. Examples of the types of mitigation that would be utilised for construction of the various aspects of the development should be included in the hydrology chapter of the EIA.
- 1.5 The day-by-day management of surface water run-off and the highest level of detail regarding the exact sizing and location of mitigation features would form part of the Pollution Prevention Plan (PPP), required as part of the Construction Site Licence (CSL).

Regulatory advice for the applicant

2. Regulatory requirements

- 2.1 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).
 - 2.2 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.
 - 2.3 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:
 - 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.
- 2.4 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.
 - 2.5 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website or by contacting waterpermitting@sepa.org.uk or wastepermitting@sepa.org.uk.

If you have any queries relating to this letter, please contact me via e-mail at: planning.sw@sepa.org.uk

Yours faithfully

Planning Officer
Planning Service

ECopy to: [REDACTED]
Energy Consents Unit EConsents_admin@gov.scot

Disclaimer

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

Chapter 6: Hydrology, Geology and Soils – Peat Survey Methodology

From: [REDACTED]
Sent: 29 April 2020 11:11
To: [REDACTED]
Subject: RE: Request for a meeting/call to discuss peat survey methodology for windfarm EIA planning

Morning [REDACTED]

I have passed your enquiry on to the SEPA SouthWest Team who will be in touch.

Regards

[REDACTED]
Forestry Specialist
Scottish Environment Protection Agency (SEPA)
Water Industry & Rural Economy Team
National Campaigns & Initiatives Unit

[REDACTED]
Holmpark Industrial Estate, New Galloway Road, Minnigaff, Newton Stewart, DG8 6BF

Got a question or need to report anything to us? With our contact centre severely impacted by reduced staffing due to current public health guidance, SEPA has developed a coronavirus.sepa.org.uk website, with information on how we're responding and how to report to and contact SEPA online:

- *[Report environmental incidents here.](#)*
- *[Check live flooding information here.](#)*
- *[Register for Floodline here.](#)*
- *[Ask questions here.](#)*

From [REDACTED]
Sent: 29 April 2020 09:45
To: [REDACTED]

Subject: Request for a meeting/call to discuss peat survey methodology for windfarm EIA planning

Dear [REDACTED]

I have been provided your name as a suggested SEPA contact by ScottishPower Renewables Environment Team. I am writing to request that a conference call can be arranged with the appropriate persons within SEPA to discuss the above subject.

Please find attached a letter providing further detail.

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]

wsp

Harestanes South Windfarm Extension Project Team

ScottishPower Renewables
9th Floor ScottishPower Headquarters
320 St Vincent Street
Glasgow
G2 5AD

HarestanesSouthWindfarm@scottishpower.com

