



# Technical Appendix 5.1

## Further Consultation

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Consultee Correspondence	
Arqiva	Atkins
DGC Archaeological Service	DGC Environmental Health Officer (Noise & Private Water Supply)
DGC Landscape Officer	Galloway Forest Astronomical Society
Historic Environment Scotland	JRC
ScotWays	SEPA
RSPB	



ARQIVA

**From:** Wind Farm Enquiries <Windfarms@arqiva.com>  
**Sent:** 27 August 2019 14:36  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation | Kilgallioch Windfarm Extension, Dumfries & Galloway

[REDACTED]

I have reviewed the proposal and confirm it to be 28Km from our nearest SHF link site so happy for you to proceed

[REDACTED]  
**Windfarm Impact Assesor**  
**Arqiva**

Mobile: [REDACTED]  
Daventry, Borough Hill, Daventry. NN11 4NB  
[www.arqiva.com](http://www.arqiva.com)

ATKINS

**From:** Windfarms <windfarms@atkinsglobal.com>  
**Sent:** 27 August 2019 13:21  
**To:** [REDACTED]  
**Subject:** WF33175 - Kilgallioch Windfarm Extension, New Luce, Dumfries and Galloway, Scotland, United Kingdom, T1-T11 - NX 24926 69849

Dear Sirs,

I am responding to an email of 27-08-2019, 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](http://www.tauwi.co.uk)*

**Windfarm Support**  
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Dumfries & Galloway Council (DGC) –  
Archaeology Service

**Subject:**RE: EXTERNAL: Kilgallioch Wind Farm  
**Date:**Fri, 9 Aug 2019 15:42:15 +0000  
**From:** [REDACTED]  
**To:** [REDACTED]

OFFICIAL

Hi [REDACTED]

Given the current vegetational circumstances I think your landscape architect's solution is elegant, especially as a 360-degree view would probably be needed from both sites in order to put the turbines into a full landscape context. I hope to be heading out to the site next week, so I'll get some panoramic shots whatever the vegetation.

Breaking the views down into four ninety-degree viewsheds with a matching wireframe would allow the sites' settings in relation to the proposed development to be understood better by non-specialists I feel.

Thanks

Andy

[REDACTED]  
Archaeologist  
Dumfries and Galloway Council  
Economy & Development  
Kirkbank House, English Street  
Dumfries, DG1 2HS  
Tel: 01387 260154 (int. 64154)  
Mob: [REDACTED]  
+ [REDACTED]

**Please note my normal working hours are 10:30 - 18:30**



<http://www.gallowayglens.org/> - a new heritage scheme for the region, check it out and get involved!  
<http://www.futuremuseum.co.uk/collections/people/lives-in-key-periods/archaeology.aspx> - website showcasing the best finds from the region

~~~~~  
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OFFICIAL

**From:** [REDACTED]  
**Sent:** 08 August 2019 12:39  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: EXTERNAL: Kilgallioch Wind Farm

hi [REDACTED], just left phone message for you.

Just wanted a quick catch up re your request in your response for additional visuals from Monandie and Dirvananie within the Wind Farm site. As things stand these sites are actively being overwhelmed by bracken, which at this time of year is obviously quite 'luxuriant'. It was certainly actively growing when our surveyors were out. I am also reliably informed that grass vegetation generally across the site is almost waist high.

We have a short window between now and the proposed submission date for the application and consequently we are not going to be able to get meaningful photography to provide montages but the landscape architects have suggested an alternative that might be more appropriate and just as useful to you. That is to prepare a 3D model from those locations. This would use the high resolution OS Masterplan imagery (aerial photography) draped over a topographic model (OS terrain modelling) and have the proposed development modelled onto that, providing a 360 degree view. In your email you are unclear whether you were asking fro 360 photomontages or just a typical 90 degree view to the nearest turbine.

Can we have a quick chat to see what you would be looking for/willing to accept please?

thanks,

[REDACTED]

01 July 2019

Our Ref: KILX/010719/GM/02

[REDACTED]  
Dumfries and Galloway Council  
English Street  
Dumfries  
DG1 2DD

Dear [REDACTED],

**Kilgallioch Wind Farm Extension, Dumfries and Galloway: Cultural Heritage**

CFA has been appointed as Cultural Heritage Consultants by ScottishPower Renewables (UK) Ltd who propose to make an application under section 36 of the Electricity Act 1989 for an extension to the operational Kilgallioch Wind Farm (the proposed development). The proposed development is EIA development as defined in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. An EIA is currently underway and a Report (EIAR) is to be produced to support the Section 36 application.

We are in receipt of a Scoping Opinion from the Energy Consents Unit (10/06/2019), which included comments from HES (22/05/2019) and from Dumfries and Galloway Council (30/05/2019) that address cultural heritage matters. Both responses contain comments on the methodological approach and recommendations regarding cultural heritage visualisations.

CFA have been instructed to consult with you directly to clarify our proposed approach to the assessment; which differs from that set out in the Scoping Report, and to agree the suitability of a proposed list of visualisations.

In regard to the proposed approach to the assessment of effects on cultural heritage, we attach an alternative methodology to that provided in the Scoping Report which draws on the available guidance, and on which HES has been invited to comment (and have approved) in relation to other wind farm projects for which CFA is currently providing cultural heritage assessments. We invite you to review and comment on this alternative approach.

In regard to visualisations, drawing on the advice in the Scoping Opinion, we have put together up a list of proposed viewpoints from locations that are aimed to address the issues set out in your Scoping Opinion and which will be provided to assist the assessment of effects on the settings of heritage assets in the wider landscape. This list, together with the blade tip height ZTV showing their locations, is attached for your comment/approval.

For the identification of important heritage assets in the wider landscape for inclusion in the assessment of potential effects on their settings, we propose to employ a 10 km study area (from the outermost turbines of the final proposed layout), in combination with the blade tip height ZTV. We have assessed the preliminary blade tip height ZTV and have not identified any designated cultural heritage assets beyond 10km where there is a potential for a



significant adverse effect on setting. If you (or HES, who are being consulted separately) advise of any assets beyond 10km that they consider warrant further assessment, these will be considered against the blade tip and hub height ZTVs for potential inclusion for assessment of impacts on their settings.

In order to provide a proportionate assessment that deals principally with potentially significant effects, we will assess the impact of the proposed development on Scheduled Monuments, Category A and B Listed Buildings, Conservation Areas, Gardens and Designed Landscapes (Inventory and non-Inventory) within 10 km of the nearest proposed turbine. We will assess the impact of the proposed development on Category C Listed Buildings and non-designated heritage assets that have non-statutory register (NSR) designation that are within 5km of the nearest proposed turbine.

We would be grateful if you could respond to the following points at your earliest convenience:

- Are you content that a 10km study area from the outermost proposed turbines, informed further by the blade tip height ZTV, is sufficient as a study area for assessment of effects on the settings of heritage assets within your remit?
- Are you content with the proposed tiered approach to the assessment?
- Are you content with the proposed methodology for assessment on effects?
- Are there any specific assets beyond 10 km that would be you wish to see included in the assessment?
- Are the proposed visualisations viewpoints in the attached list acceptable and do you have any comments that you wish to make?

We would be grateful if you could provide your comments on these matters by 26 July 2019 (earlier if at all possible). Should you have any questions regarding this matter, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]  
[REDACTED]  
*Senior Archaeological Consultant*

Encl:

- Proposed Assessment Methodology
- List of proposed visualisations
- Outer Study Area ZTV (with designations and indicative 10 km study area marked)



Proposed Surveys and Assessment Methodologies

Guidance

- 1.1
- The assessment will be carried out with reference to the following guidance documents:
- SNH & Historic Environment Scotland (2018) ‘Environmental Impact Assessment Handbook’
  - Chartered Institute for Archaeologists (2014) ‘Standard and Guidance for Historic Environment Desk-Based Assessment’.
  - Historic Environment Scotland (2016) ‘Managing Change in the Historic Environment: Setting’.
  - Planning Advice Note (PAN) 2/2011: Planning and Archaeology.

Proposed Study Area

- 1.2
- Two study areas will be used for the assessment:
- The Inner Study Area: the Proposed Development site, defined by the site red line boundary, within which turbines and associated infrastructure are proposed, will form the study area for the identification of heritage assets that could receive direct effects arising from the construction of the Proposed Development.
  - The Outer Study Area: a wider study area extending 10km from the outermost finalised proposed turbine locations will be used for the identification of cultural heritage assets whose settings may be affected by the Proposed Development (including cumulative effects).

Desk-based Assessment Method

- 1.3
- A desk-based assessment and a targeted field survey will be conducted covering the Inner Study Area. The purpose will be to identify all known heritage assets, designated or otherwise, that could be directly affected by the Proposed Development, and to inform an assessment of the archaeological potential of the Proposed Development site.
- 1.4
- Sources to be consulted for the collation of data will include:
- The Dumfries and Galloway (DGC) Historic Environment Record (HER)
  - Historic Environment Scotland’s (HES) on-line GIS Spatial Data Warehouse
  - National Record of the Historic Environment (NRHE)
  - Historic maps held by National Library of Scotland
  - Modern aerial photographic imagery available online
  - Historic Land-Use Assessment Data for Scotland (HLAmap)
  - Scottish Palaeoecological Archive Database (SPAD) (Coles et al, 1998<sup>1</sup>)
  - Any existing geotechnical data, including peat survey data if available
  - Other readily accessible published sources, including the previous environmental impact assessment for the operational Kilgallioch Wind Farm (SPR 2009<sup>2</sup>) and any reports referenced in HER/NRHE records.
- 1.5
- Data will be gathered for the Outer Study Area to identify designated assets that may be subject to effects on their setting and to provide baseline information for the assessment of

<sup>1</sup> Coles, G.M., Gittings, B.M., Milburn, P. and Newton, A.J. (1998) Scottish Palaeoecological Archive Database [online], available from <http://www.geo.ed.ac.uk/spad/>.  
<sup>2</sup> Kilgallioch Wind Farm Environmental Statement (2009).

setting effects. Sites whose settings will be assessed include Scheduled Monuments (SMs), Listed Buildings and Conservation Areas. There are no Inventory status Gardens and Designed Landscapes within 10km of the Proposed Development.

- 1.6
- Undesignated archaeological sites and features identified in the DGC HER as non-statutory register (NSR) sites and located within 5km of the Proposed Development site boundary will also be considered for potential effects on their settings from the Proposed Development.

Field Survey Method

- 1.7
- A walk-over field survey of the proposed development site will be carried out to record the baseline character of sites identified through the desk-based assessment and to identify any others not revealed through the desk-based study, and to record their baseline character, condition and heritage value. The field survey will have the following aims:
- to assess the present baseline condition of the regionally and nationally important heritage assets identified through the desk-based assessment;
  - to identify any further features of cultural heritage interest not detected from the desk-based assessment; and,
  - to assess the Inner Study Area for its potential to contain currently unrecorded, buried archaeological remains
- 1.8
- Identified sites will be recorded on pro-forma monument recording forms and by digital photography, and their positions (and where appropriate their extents) logged using a Global Positioning System (GPS). The survey data will be compiled in a GIS and used during the design iteration work. The results of the survey work will be provided to DGCAS for inclusion in the HER.
- 1.9
- Site visits to key heritage assets in the Outer Study Area will be carried out, where necessary and in as far as access is possible, to assess the predicted effect of the Proposed Development on their settings. Site visits will include any assets specifically identified by consultees as requiring assessment and those identified through analysis of the blade tip height Zone of Theoretical Visibility (ZTV) that lie within 5km of the Proposed Development, where it is considered, on the basis of professional judgement, that the effect on their settings could be significant.

Assessment Method

- 1.10
- The assessment of significance of effects will be undertaken using two key criteria: the sensitivity to change of the cultural heritage assets and the magnitude of effects, which measures the degree of change to the baseline condition of an asset resulting from the Proposed Development.

Assigning Sensitivity to Heritage Assets

- 1.11
- The sensitivity to change of cultural heritage assets reflects the relative weight given to them in Scottish Planning Policy 2014 (SPP). Table 10.1 summarises the relative sensitivity of key cultural heritage assets relevant to the Proposed Development.

Table 10.1: Sensitivity of Heritage Assets

| Sensitivity of Asset | Definition / Criteria <sup>3</sup>                                                                                                       |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| High                 | Sites of national importance, including:<br><br>Scheduled Monuments and sites proposed for scheduling<br><br>Category A Listed Buildings |

<sup>3</sup> Derived from ICOMOS (2011) & DMRB (2007)

|            |                                                                                                                                                                                                                                                                                                                                                                 |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Medium     | Sites of regional importance, including:<br><br>Archaeological sites and areas of distinctive regional importance<br><br>Undesignated archaeological sites and features identified in Council Historic Environment Records (HER) as non-statutory register (NSR) sites.<br><br>Category B Listed Buildings<br><br>Conservation Areas                            |
| Low        | Sites of local importance, including:<br><br>Archaeological sites of local importance<br><br>Category C Listed Buildings<br><br>Unlisted buildings and townscapes with local (vernacular) characteristics                                                                                                                                                       |
| Negligible | Sites of little or no importance, including:<br><br>Artefact find-spots (where the artefacts are no longer in situ and where their provenance is uncertain)<br><br>Unlisted buildings of minor historic or architectural interest<br><br>Poorly preserved examples of particular types of features (e.g. quarries and gravel pits, dilapidated sheepfolds, etc) |

Criteria for Assessing the Significance of Effects

- 1.12 The magnitude of effects will be assessed in the categories, high, medium, low and negligible and described in Table 10.2.

Table 10.2: Magnitude of Effects

| Level of Magnitude | Definition <sup>4</sup>                                                                                                                                                                                                                                                                                                                                                            |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High               | A fundamental change to the physical condition of an asset, leading to total loss of the asset or major alteration to its character.<br><br>Comprehensive change in the surroundings of an asset, such that its baseline setting is substantially or totally altered and key visual links and relationships with the surroundings are lost or substantially affected.              |
| Medium             | A material change to the physical condition of a heritage asset, resulting in partial loss or clear alteration of its character.<br><br>Considerable changes to the surroundings of an asset, such that the character of the asset and its baseline setting is partly and materially altered and key visual links and relationships with the surroundings are materially affected. |
| Low                | A slight but detectable change to the physical condition of a heritage asset, resulting in minor alteration of its character.<br><br>A slight but noticeable change in the surroundings of an asset, resulting in superficial alteration of its baseline setting while key visual links and relationships with the surroundings are unaffected.                                    |

<sup>4</sup> Derived from ICOMOS (2011) & DMRB (2007)

|            |                                                                                                                                                                                                                                                                                                   |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Negligible | A barely distinguishable change to the physical condition of a heritage asset.<br><br>A very slight and barely distinguishable change in the surroundings of an asset, resulting in no obvious alteration of its baseline setting or to key visual links and relationships with the surroundings. |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- 1.13 The sensitivity of the asset (Table 10.1) and the magnitude of the predicted change (Table 10.2) will be used to inform the professional judgement of the potential significance of the effects. Table 10.3 summarises the criteria for assigning significance of effects. Where two outcomes are possible through application of the matrix, professional judgement supported by reasoned justification, will be employed to determine the level of significance.

Table 10.3: Significance of Effects<sup>5</sup>

| Magnitude of Effect | Sensitivity of Asset |                  |                  |                  |
|---------------------|----------------------|------------------|------------------|------------------|
|                     | High                 | Medium           | Low              | Negligible       |
| High                | Major                | Major/Moderate   | Moderate/Minor   | Minor            |
| Medium              | Major/Moderate       | Moderate         | Minor            | Minor/Negligible |
| Low                 | Moderate/Minor       | Minor            | Minor/Negligible | Minor/Negligible |
| Negligible          | Minor                | Minor/Negligible | Minor/Negligible | Minor/Negligible |

- 1.14 Major and Moderate effects are considered to be ‘significant’ in the context of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations). Minor and Neutral effects are considered to be ‘not significant’.

Assessment of Effects on Setting

- 1.15 Historic Environment Scotland’s guidance document, 'Managing Change in the Historic Environment: Setting' (HES 2016), notes that:
- "Setting can be important to the way in which historic structures or places are understood, appreciated and experienced. It can often be integral to a historic asset's cultural significance."*
- "Setting often extends beyond the property boundary or ‘curtilage’ of an individual historic asset into a broader landscape context".*
- 1.16 The guidance also advises that:
- "If proposed development is likely to affect the setting of a key historic asset, an objective written assessment should be prepared by the applicant to inform the decision-making process. The conclusions should take into account the significance of the asset and its setting and attempt to quantify the extent of any impact. The methodology and level of information should be tailored to the circumstances of each case".*
- 1.17 The guidance recommends that there are three stages in assessing the impact of a development on the setting of a historic asset or place:
- Stage 1: identify the historic assets that might be affected by the proposed development;

<sup>5</sup> Based on DMRB (2007)

- Stage 2: define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced; and,
  - Stage 3: evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated.
- 1.18 Following this approach, for each cultural heritage asset where a potential effect on setting has been identified, the assessment of possible effects will adopt a four-stage approach.
- Identification of the characteristics of the setting of the asset;
  - Assessment of the sensitivity of that setting;
  - Identification of how the presence of the proposed wind farm would affect that setting (magnitude of effect); and,
  - Assessment of the significance of the effect.
- 1.19 Scoping Responses from Historic Environment Scotland (HES) and DGC Archaeology Service (DGCAS) have identified a number of Scheduled Monuments and non-designated heritage assets, as recommended for inclusion in the assessment for effects on their settings.

Scheduled Monuments

- Wood Cairn, cairn, Eldrig Fell (SM1953)
- Cairn na Gath, long cairn, Balmurrie Fell (SM1922)
- Caves of Kilhern, Chambered Cairn 450m SE of Dranigower Lodge (SM1928)
- Bennan of Garvilland, Fort (SM1955)
- Laggangarn stones, Laggangarn (SM90199 and Property in Care)
- Wells of the Rees, wells 500m NNE of Kilgallioch (SM2002)

Non-designated Heritage Assets

- Craigmoddie fermtoun (MDG2317)
- Linn's Tomb (MDG2327)
- East Rhins (ASA)

- 1.20 To aid the assessment visualisations (photomontages/wirelines) will be produced to inform the assessments for these assets; viewpoint locations (along with proposed visualisation type and the issue to be addressed) are listed in Table 10.4. All visualisations will be prepared by the LVIA consultants to SNH standards.

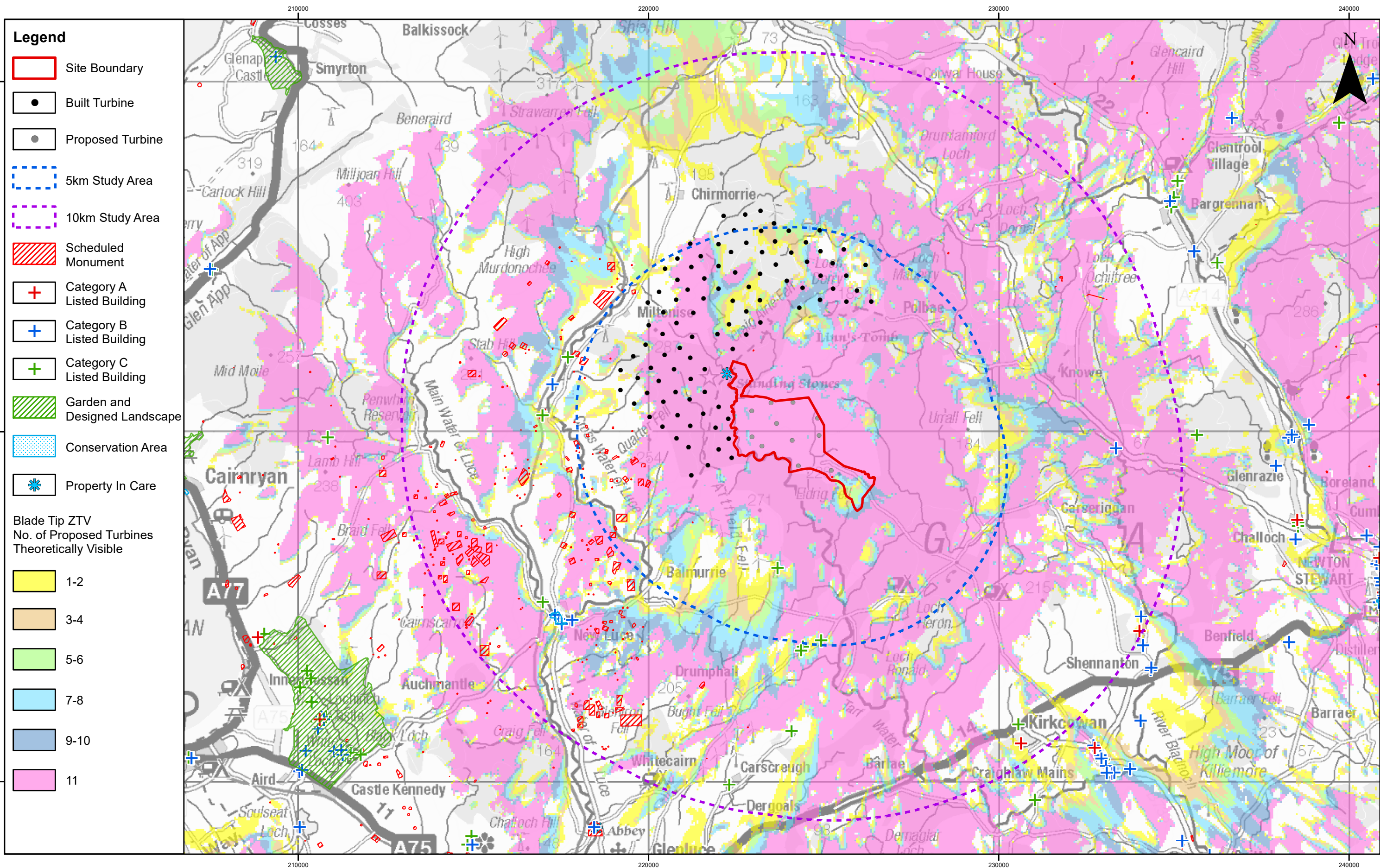
Table 10.4: Candidate Cultural Heritage Viewpoint List

| Asset name & Ref No                                           | Status             | Approx Grid Ref | Photomontage / Wireline                                      |
|---------------------------------------------------------------|--------------------|-----------------|--------------------------------------------------------------|
| Wood Cairn, cairn, Eldrig Fell (SM1953)                       | Scheduled Monument | NX 25242 68711  | Photomontage (cumulative with Kilgallioch)                   |
| Cairn na Gath, long cairn, Balmurrie Fell (SM1922)            | Scheduled Monument | NX 21260 67412  | Photomontage (cumulative with Kilgallioch and Artfield Fell) |
| Caves of Kilhern, Chambered Cairn 450m SE of Dranigower Lodge | Scheduled Monument | NX 19842 64420  | Photomontage (cumulative with                                |

|                                                           |                            |                |                                                                                      |
|-----------------------------------------------------------|----------------------------|----------------|--------------------------------------------------------------------------------------|
| (SM1928)                                                  |                            |                | Kilgallioch and Artfield Fell)                                                       |
| Bennan of Garvilland, Fort (SM1955)                       | Scheduled Monument         | NX 21533 62758 | Photomontage (cumulative with Kilgallioch, Glenchamber and Artfield Fell)            |
| Laggangarn stones, Laggangarn (SM90199)                   | Scheduled Monument and PiC | NX 22235 71667 | Wireline (site is within standing commercial forestry) (cumulative with Kilgallioch) |
| Wells of the Rees, wells 500m NNE of Kilgallioch (SM2002) | Scheduled Monument         | NX 22993 72326 | Wireline (site is within standing commercial forestry) (cumulative with Kilgallioch) |
| Craigmoddie fermtoun (MDG2317)                            | non-designated (NSR)       | NX 24400 72000 | Photomontage (cumulative with Kilgallioch)                                           |
| Linn's Tomb (MDG2327)                                     | non-designated (NSR)       | NX 24400 72620 | Wireline (site is screened by topography) (cumulative with Kilgallioch)              |

Cumulative Assessment

- 1.21 The assessment of cumulative effects on heritage assets will be based upon consideration of the effects of the Proposed Development on the settings of assets with statutory designations and non-statutory designations within 10km of the outermost turbines, in addition to the likely effects of other developments that are under construction, those that are consented but not yet built and those that are currently at the application stage(and for which sufficient detail is available upon which to develop and assessment). Proposed developments at the scoping or pre-application stage will not be included in the assessment; as such proposals are not fully formed and may be subject to changes that cannot be foreseen. The schemes to be included in the cumulative impact assessment will be those identified through the LVIA consultations with DGC and SNH.
- 1.22 The assessment of cumulative effects on the settings of heritage assets from the Proposed Development in combination with pre-existing developments (including the operational Arcleoch and Kilgallioch developments) will be addressed in the course of the assessment of effects of the Proposed Development alone, as pre-existing developments are part of the baseline environment.
- 1.23 The assessment will take into account the relative scale (i.e. size and number of turbines) of the identified developments, their distance from the affected assets, and the potential degree of visibility of the various developments from the assets under consideration. The use of cumulative wireline visualisations (and cumulative ZTVs where available) will be used to aid the assessment.



Your Ref:

Development Planning

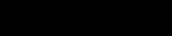
Our Ref:  
EPCOA4/2019/KWF

Kirkbank House

English Street

31 July 2019

Dumfries DG1 2HS

  
CFA Archaeology Ltd  
Old Engine House  
Eskmills Park  
Musselburgh  
EH21 7PQ

Any enquiries please contact







Dear George

**KILGALLIOCH WIND FARM – CULTURAL HERITAGE**

I am in receipt of your letter of 1 July, along with your alternative approach to the assessment of cultural heritage impacts as it differs from that set down in the Scoping Report.

I am content that a 10km study area from the outermost proposed turbines is sufficient for an assessment of indirect effects on heritage assets. I am not aware of any assets within Dumfries and Galloway that lie outwith that area which should be taken into consideration with regard to the current scheme.

Within the Proposed Study and Assessment Methodology I am content with sections 1.1 through to 1.4, but do not agree with sections 1.5 and 1.6 as will be shown below. I am also content with the proposals for the Inner Study Area, as noted in sections 1.7 to 1.9.

I do take issue with that element of sections 1.5 and 1.6, and within Table 10.1 Sensitivity of Heritage Assets pertaining to undesignated sites considered to meet the criteria for scheduling, referred to in the text as NSR sites, though those in Dumfries and Galloway were subject to a second assessment of significance aligned to the planning process rather than the criteria laid down for the NSR project by Historic Scotland.

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. 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 a specified set of 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.

At the same time, in tandem with the NSR project, the then current planning guideline NPPG5 required monuments to be assessed for their significance, so the opportunity was taken to compile those grades as well, in a separate field. This maps to those grades referred to in the Significance Scope Note supplied to CFA Archaeology with the extract of HER data for this application. Those records that fell into the categories ‘Almost certainly of national importance’ and ‘Very probably of national importance’ in the NSR were subsequently allocated the significance grade of ‘National’ in relation to planning. Although NPPG has been succeeded by later guidance the assessment of the significance of historic assets followed in later iterations and is still at the core of planning policy and guidance.

Our Place in Time: The Historic Environment Strategy for Scotland notes a priority to:

*Ensure that decision making is informed and that sound evidence-based information is available at all levels of decision making.*

and that

*Effective management of the historic environment begins with proper understanding of the significance and values of the asset.*

HEP1 (HEPS 2019) states:


*Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.*

Accordingly, as the significance dataset is maintained and current, and adheres to current criteria for designation, assets that have been assessed as being of national significance by the DGCAS should be considered as of national significance for development and land management purposes, even if they are not yet designated, and considered of high sensitivity. They should also be included within the 10km assessment, as was requested in the Council’s scoping response.

This issue is of particular relevance to the current application as there are a number of sites at the southern edge of the development area that are considered by DGCAS as meeting the criteria for scheduling, and I firmly believe that reducing their assessment to ‘regional significance’ would fundamentally downplay their importance and the effects of any impacts.

I am content with the rest of the methodology document and am in agreement on the selection of assets for cultural heritage viewpoints. I would like two additional sites, the fermtouns of Dirvananie (MDG13123) centred on NX 22960 70260 and Monandie (MDG2177) centred on NX 24457 69689 to have photomontages produced. The sites have well-preserved remains, are shown on maps from the 17<sup>th</sup> century onwards and are graded as of national significance by DGCAS. They also lie at the centre of other groups of assets and can be representative for them too, such as the chambered cairn and burnt mounds around Monandie.

Yours sincerely

  
Archaeologist

# DGC – Environmental Health Officer

The Environmental Health Department of DGC were consulted on the methodology as to the operational noise assessment, including the cumulative assessment and the derivation of relevant noise limits applicable to the proposed Development. It was agreed verbally with Dumfries and Galloway Council (DGC) that because of the number of operational windfarms in the vicinity, baseline noise monitoring would not be required or practicable as it would not be possible to accurately establish background noise levels in the absence of existing windfarm noise.

It should be noted that although attempts were made, no written confirmation of this discourse with DGC has been obtained. The ECU confirmed in an email on the 01 of November 2019, that they were in agreement that sufficient effort had been made to obtain written agreement.

# DGC - Private Water Supplies

**From:** [REDACTED]  
**Sent:** 18 July 2019 17:12  
**To:** [REDACTED]  
**Subject:** RE: Proposed Kilgallioch Windfarm Extension - consultation on PWS

OFFICIAL

Hi [REDACTED]

Referring to the plan attached to your e-mail below, I've checked our register of private water supplies but have found no record of any private water supplies within the area bounded by the black dashed line. Please be aware however that our register cannot be guaranteed to be 100% accurate, up-to-date or comprehensive.

Apologies for the delay with my reply.

If you require any further information please let me know.

Regards

[REDACTED]  
Environmental Health and Trading Standards  
Dumfries and Galloway Council  
Municipal Chambers  
Buccleuch Street  
Dumfries  
DG1 2AD

[REDACTED]

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!!! Please consider the environment - do you really need to print this email?

OFFICIAL

**From:** [REDACTED]  
**Sent:** 20 June 2019 09:46

**To:** [REDACTED]  
**Subject:** FW: EXTERNAL: Proposed Kilgallioch Windfarm Extension - consultation on PWS

Hi [REDACTED]  
Can you deal with this please.  
Many thanks  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 19 June 2019 16:51  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** EXTERNAL: Proposed Kilgallioch Windfarm Extension - consultation on PWS

Dear [REDACTED]

I am getting in touch with regard to the proposed Kilgallioch Windfarm Extension, on which we are working with ScottishPower Renewables.

To aid in the assessment of potential hydrology/hydrogeology effects and inform site design and mitigation, I would be grateful if you could please provide information on any known Private Water Supplies within the area shown on the attached plan (black dashed line, which is a 500m buffer around the site boundary).

If there are any known PWS within this area, would you please be able to provide the following information if available?

- Location of the supply
- Status of supply i.e. known to be active, possibly disused etc.
- Name(s) and number of properties supplied
- Type of supply – surface water or groundwater
- Any details of supply infrastructure
- Any monitoring known to have been undertaken

If you have any queries or need any further information in order to respond, please don't hesitate to get in touch.  
Best regards,

[REDACTED]  
Office: +44 (0)131 557 8325 | Mobile: +44 (0)7817 778 100  
7 Dundas Street, Edinburgh EH3 6QG  
[www.itpenergised.com](http://www.itpenergised.com)

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# DGC - Landscape Officer

From: [redacted]  
Sent: 30 July 2019 08:31  
To: [redacted]  
Cc: [redacted]  
Subject: RE: EXTERNAL: Kilgallioch Extension Windfarm, near New Luce

Dear [redacted]

It was confirmed by Chris McTier at the Gatecheck Meeting yesterday that viewpoint D is to be included as a night time assessment viewpoint.

Kind regards,  
[redacted]

Anna Hudson | Principal Consultant | ITPEnergised  
Office: +44 (0)131 557 8325 | Mobile: +44 (0)7725 843 412  
Working Days: Monday – Wednesday

From: [redacted]  
Sent: 16 July 2019 09:39  
To: [redacted]@[redacted]  
Subject: RE: EXTERNAL: Kilgallioch Extension Windfarm, near New Luce

Dear [redacted]

Thanks again for you and Janet’s response on this.  
We will proceed with viewpoints as listed at scoping with the two additions suggested by Janet at Eldrig Fell and on the A714 near Bargrennan Cottage. In relation to A (Merrick) and E (A714 nrth of Newton Stewart) these will now be included as assessment locations as opposed to wireline only.

In relation to viewpoint D it reads like Janet is suggesting this be included as a night time assessment viewpoint although wording isn’t clear, can you please confirm this with her.

Kind Regards  
[redacted]

open  
optimised environments ltd

edinburgh | london | manchester

Quartermile Two | Level 2 | 2 Lister Square | Edinburgh | EH3 9GL  
t 0131 221 5920  
w [optimisedenvironments.com](http://optimisedenvironments.com)  
Optimised Environments Limited. Registered in Scotland SC359690.  
Registered address: Quartermile Two, Level 2, 2 Lister Square, Edinburgh, EH3 9GL

From: [redacted]  
Sent: 12 July 2019 18:45  
To: [redacted]  
Cc: [redacted]  
Subject: Re: EXTERNAL: Kilgallioch Extension Windfarm, near New Luce

Thanks [redacted]  
Very much appreciated. Will get back to you with anything further once reviewed Janet’s comments.  
Regards  
[redacted]  
Sent from my iPhone

On 12 Jul 2019, at 10:39, [redacted] wrote:  
OFFICIAL

Hi [redacted]

Apologies for the slight delay in getting back to you with this, I’ve only just managed to speak to Janet in person this week.

She has looked over the VP list from the Scoping report and the others that were suggested, and her response is attached for your assistance.

Let me know if you need anything else.

Kind regards,  
[redacted]

[redacted]  
Senior Planner | (Major Development)  
Dumfries & Galloway Council

From: [redacted]  
Sent: 11 July 2019 11:58  
To: [redacted]  
Cc: [redacted]  
Subject: Kilgallioch Extension

OFFICIAL  
[redacted]

I think the VP list is reasonably comprehensive but would suggest adding two: Eldrig Fell, which we have always used in the past and shows this area well; and a worst case scenario taken from the Bargrennan Cottage stretch of the A711. Also I suggest keeping in A and E, even to demonstrate non effect, given the sensitivity of these receptors – plus effects on the Merrick Wild Land Area and Galloway Forest Dark Sky Park of any lighting – it is probably also worth keeping D in for the same reason as this scheme would be likely to introduce lighting to the Wigtownshire Moorlands.

Any requirement for lighting would introduce an important new visual issue, as would cumulative visual effects of the extension seen in combination with other wind farm development around about. Otherwise this might be more largely a case about landscape character: the remaining open area of moorland, the relationship of turbines to Eldrig Fell and other features of the moorland such as the abandoned farmsteads (Eldrig used to be very fine), local topography and mosaic of semi-natural moorland vegetation. I also think Andrew Nicholson will have quite cultural heritage concerns, given previous negotiations around the original Kilgallioch scheme. This would be a good case for a joint site visit when we get to that stage.

[REDACTED]

[REDACTED]

Landscape Architect (Wind Farms), Major Projects Team, Economy and Development Services  
Economy and Resources (Directorate), Kirkbank, English Street, Dumfries, DG1 2HS

Internal: 64054 / 64379  
External: 01387 260199 / 260151  
Work pattern: alternate Tuesdays, Wednesday - Friday

OFFICIAL  
From: [REDACTED]  
Sent: 24 June 2019 10:29  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: EXTERNAL: Kilgallioch Extension Windfarm, near New Luce

Dear [REDACTED]

Kilgallioch Extension Windfarm, near New Luce  
DGC Ref: 19/0599/ENQ

OPEN is undertaking the Landscape and Visual Impact Assessment (LVIA) for the proposed Kilgallioch Extension Wind Farm. Thank you for comments dated 30th May 2019 although we note that the scoping advice to date does not include detailed landscape and visual advice from Dumfries and Galloway Council (D&GC). I assume that the D&GC landscape advisor is Janet Swailes and if so would appreciate if you could forward this email to her also. We are progressing with the LVIA and would like to agree the viewpoint locations for the LVIA prior to finalising viewpoint photography and assessment work. We have considered the scoping viewpoints further during our ongoing field survey and desk based appraisal and consider the 10 assessment viewpoint locations within the scoping report to be appropriate for the purposes of the LVIA. The LVIA will also include the additional 5 preliminary viewpoint locations in a wireline appendix (listed in the scoping report as viewpoints A-D). In terms of the visual assessment of lighting effects we propose that VP 3 - West of Derry (SUW), VP 4 - Mains of Larg and VP 10 - Bruce's Stone, Glentrool (within DSP buffer) be used as night time assessment viewpoints. As stated in the scoping report, consideration has also been given to the potential visibility of a proposed solar array. Following a review of visibility we can confirm that within 5km, VP 1 – Craig Airie Fell and VP 2 – SUW (Knockniehourie) could potentially have views of the solar array. These viewpoints will therefore be used in the assessment of effects of solar. I'd be grateful if you could confirm if Dumfries & Galloway Council are in agreement with the viewpoints proposed for the LVIA and it would also be very useful to know the timescales of the detailed L&V advice mentioned in the D&GC scoping response. If you would like to discuss the viewpoints or other landscape and visual matters we are happy to attend a meeting at the D&GC offices in Dumfries. We can be quite flexible on a meeting date and if you feel a meeting would be beneficial then please let us know you and/or Janet's availability over the next 4 weeks.

We look forward to hearing from you and to receiving your scoping response in due course.

Best Regards  
[REDACTED]  
[REDACTED]  
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optimised environments ltd  
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w optimisedenvironments.com  
Optimised Environments Limited. Registered in Scotland SC359690. Registered address: Quartermile Two, Level 2, 2 Lister Square, Edinburgh, EH3 9GL

# JRC

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>  
Sent: 27 August 2019 10:11  
To: [REDACTED]  
Subject: Consultation | Kilgallioch Windfarm Extension, Dumfries & Galloway [WF783189]

-- do not edit anything below this line --

Dear [REDACTED]

A Windfarms Team member has replied to your coordination request, reference **WF783189** with the following response:

Dear Sir/Madam,

**Site Name:**

*Kilgallioch Windfarm Extension*

**Turbine at NGR:**

| Turbine | X      | Y      | Max. Tip height | Max. Rotor Diameter |
|---------|--------|--------|-----------------|---------------------|
| T1      | 224926 | 569849 | 180m            | 150m                |
| T2      | 222904 | 570588 | 180m            | 150m                |
| T3      | 223603 | 570349 | 180m            | 150m                |
| T4      | 222907 | 569869 | 180m            | 150m                |
| T5      | 224015 | 570833 | 180m            | 150m                |
| T6      | 224832 | 570361 | 180m            | 150m                |
| T7      | 224572 | 570851 | 180m            | 150m                |
| T8      | 223403 | 570880 | 180m            | 150m                |
| T9      | 224228 | 569777 | 180m            | 150m                |
| T10     | 223551 | 569794 | 180m            | 150m                |
| T11     | 224519 | 569291 | 180m            | 150m                |

**Hub Height:** 105m **Rotor Radius:** 75m

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

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<http://www.jrc.co.uk/about-us>

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We hope this response has sufficiently answered your query.  
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xqmdqaaf1ieaaa%2BE0Gn%2FO4DgvoKg%3D%3D>

# Galloway Forest Astronomical Society

**From:** [REDACTED]  
**Sent:** 21 August 2019 16:15  
**To:** [members@gf-astro.org](mailto:members@gf-astro.org)  
**Cc:** [REDACTED]  
**Subject:** RE: ScottishPower Renewables - Kilgallioch Windfarm Extension

Good afternoon,

Just to inform you that we will be progressing with assessments for the proposed Kilgallioch Windfarm Extension, and therefore would like to follow up and check if you have any comments or queries on the development that you would like to raise with the project team?

We would be happy to answer any questions and address any concerns.

Kind Regards

[REDACTED]  
[REDACTED] **Consultant** | ITPnergised  
Office: +44 (0) 131 557 8325 | Mobile: +44 (0) 7739 574 552  
7 Dundas Street, Edinburgh, EH3 6QG  
[www.itpnergised.com](http://www.itpnergised.com)

**From:** [REDACTED]  
**Sent:** 30 July 2019 11:55  
**To:** [members@gf-astro.org](mailto:members@gf-astro.org)  
**Cc:** [REDACTED]  
**Subject:** ScottishPower Renewables - Kilgallioch Windfarm Extension

Good Morning,

ITPnergised are undertaking an Environmental Impact Assessment on behalf of ScottishPower Renewables, for a proposed extension to the operational Kilgallioch Windfarm. This new site is in Dumfries and Galloway, adjacent to the existing windfarm, to the south-east. I attach a site location plan for your reference.

The proposed development will comprise up to 11 turbines, which will be up to 180m to tip height. Please find a link below to the Scoping Report, which was submitted to the Energy Consents Unit of the Scottish Government in April this year.

<http://www.energyconsents.scot/ApplicationDetails.aspx>

We would like to invite you to provide your comment on the proposed windfarm development and would be happy to answer any questions you may have.

Kind regards,

[REDACTED]  
[REDACTED] **Consultant** | ITPnergised  
Office: +44 (0) 131 557 8325 | Mobile: +44 (0) 7739 574 552  
7 Dundas Street, Edinburgh, EH3 6QG  
[www.itpnergised.com](http://www.itpnergised.com)

# Historic Environment Scotland

Subject: RE: Kilgallioch Wind Farm consultation  
Date: Fri, 23 Aug 2019 09:19:08 +0000  
From: [REDACTED]

To: [REDACTED]

CC: [REDACTED]  
[REDACTED]

Dear [REDACTED]

Thank you for your message regarding your Cultural Herirage and Archaeology Assessment in support of the emerging proposals for the Kilgallioch Wind Farm extension. We have reviewed the proposed survey and assessment methodology attached to your message and can confirm that we are content with the approach to assessment set out in this document.

We also note your additional comments regarding the selection of visualisation viewpoints of the proposals in relation to Wood Cairn (Scheduled Monument, Index no.1953). We understand from your message and the attached topographical model that there will be no visibility of the proposals in views of Wood Cairn from the south east. On this basis, we are content for you to exclude a visualisation viewpoint from this location.

I hope that this is helpful to you and look forward to being formally consulted on the proposals and associated EIA Report in due course.

Many thanks,

[REDACTED]  
Alison Baisden | Senior Casework Officer | Heritage Directorate | Casework Team  
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  
T: 0131 668 8575  
M: [REDACTED]  
[REDACTED]

[www.historicenvironment.scot](http://www.historicenvironment.scot)

On May 1st we adopted the new Historic Environment Policy for Scotland. You can read the full policy and associated guidance online at [www.historicenvironment.scot/heps](http://www.historicenvironment.scot/heps)

Heritage For All - read our new Corporate Plan and help to share our vision

From: [REDACTED]  
Sent: 12 August 2019 11:10  
To: [REDACTED]  
Subject: Kilgallioch Wind Farm consultation

following on from receipt of consultation response comments from both of you, I have reviewed the methodology presented previously and made some amendments; which I hope will address the various concerns raised.  
I therefore attach an amended version of the methodology that we propose be used for the assessment, and which we intend to adopt for all cultural heritage assessments going forward. The places where changes have been made are highlighted for your ease of reference and for ease of comparison I have also attached the previous version.

Can I ask each of you to quickly review the proposed changes and advice if this amended version now accommodates previous concerns or, if not, to highlight any outstanding matters?  
Andrew, please note that I have taken note of your comments on the Clauchrie Wind Farm re-consultation and adjusted the methodology accordingly. I have also added in the two NSR assets within the PDA as agreed (Table 10.4).  
Sandra/Alison, please note the specific comment below relating to your request for an additional visualisation for Wood Cairn: Wood Cairn (SM1953): In the consultation response, you have not indicated a location that you would wish to see used to provide a visualisation where the Cairn would be seen backdropped by the proposed development. For your information, I attach a topographical model of the viewshed from Wood Cairn, which indicates that there are no viewpoints to the SE of Eldrig Fell. In fact, and perhaps interestingly, that is the one direct from where there is no such potential long distance visibility of the cairn. Please can you clarify why you require this additional viewpoint and if (after reviewing the attached viewshed) you still do require such a visualisation? And if so, from where you require the viewpoint?  
If at all possible, could each of you get back to me next week with any comments please?  
thanks,  
[REDACTED]  
--  
[REDACTED]  
Mobile: 07990 554 981  
For CFA Archaeology Ltd  
Head Office, Scotland: CFA Archaeology Ltd I Old Engine House I Eskmills Park I Musselburgh I East Lothian I EH21 7PQ  
Main Switchboard: 0131 273 4380 I [www.cfa-archaeology.co.uk](http://www.cfa-archaeology.co.uk)

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Carlisle Office: 01228 564531 - [cumbria@cfa-archaeology.co.uk](mailto:cumbria@cfa-archaeology.co.uk) I Manchester Office: 0161 428 8224 - [manchester@cfa-archaeology.co.uk](mailto:manchester@cfa-archaeology.co.uk)  
Leicestershire Office: 0116 279 5156 - [leicestershire@cfa-archaeology.co.uk](mailto:leicestershire@cfa-archaeology.co.uk) I Milton Keynes Office: 01908 226124 - [miltonkeynes@cfa-archaeology.co.uk](mailto:miltonkeynes@cfa-archaeology.co.uk)  
Hoddesdon Office: 0845 017 9847 - [herts@cfa-archaeology.co.uk](mailto:herts@cfa-archaeology.co.uk)  
Registered address: Old Engine House I Eskmills Park I Musselburgh I EH21 7PQ I company no. 208318 I vat reg no. 751 4761 29

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Registered office: Longmore House, Salisbury Place, Edinburgh, EH9 1SH

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01 July 2019

Our Ref: KILX/010719/GM/01

Historic Environment Scotland  
Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Dear Sir/Madam,

**Kilgallioch Wind Farm Extension, Dumfries and Galloway: Cultural Heritage**

CFA has been appointed as Cultural Heritage Consultants by ScottishPower Renewables (UK) Ltd who propose to make an application under section 36 of the Electricity Act 1989 for an extension to the operational Kilgallioch Wind Farm (the proposed development). The proposed development is EIA development as defined in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. An EIA is currently underway and a Report (EIAR) is to be produced to support the Section 36 application.

We are in receipt of a Scoping Opinion from the Energy Consents Unit (10/06/2019), which included comments from HES (22/05/2019) and from Dumfries and Galloway Council (30/05/2019) that address cultural heritage matters. Both responses contain comments on the methodological approach and recommendations regarding cultural heritage visualisations.

CFA have been instructed to consult with you directly to clarify our proposed approach to the assessment; which differs from that set out in the Scoping Report, and to agree the suitability of a proposed list of visualisations.

In regard to the proposed approach to the assessment of effects on cultural heritage, we attach an alternative methodology to that provided in the Scoping Report which draws on the available guidance, and on which HES has been invited to comment (and have approved) in relation to other wind farm projects for which CFA is currently providing cultural heritage assessments. We invite HES to review and comment on this alternative approach.

In regard to visualisations, drawing on the advice in the Scoping Opinion, we have put together up a list of proposed viewpoints from locations that are aimed to address the issues set out in your Scoping Opinion and which will be provided to assist the assessment of effects on the settings of heritage assets in the wider landscape. This list, together with the blade tip height ZTV showing their locations, is attached for your comment/approval.

For the identification of important heritage assets in the wider landscape for inclusion in the assessment of potential effects on their settings, we propose to employ a 10km study area (from the outermost turbines of the final proposed layout), in combination with the blade tip height ZTV. We have assessed the preliminary blade tip height ZTV and have not identified any designated cultural heritage assets beyond 10km where there is a potential for a



significant adverse effect on setting. If HES (or Dumfries and Galloway Council Archaeology Service, who are being consulted separately) advise of any assets beyond 10 km that they consider warrant further assessment, these will be considered against the blade tip and hub height ZTVs for potential inclusion for assessment of impacts on their settings.

In order to provide a proportionate assessment that deals principally with potentially significant effects, we will assess the impact of the proposed development on Scheduled Monuments, Category A and B Listed Buildings, Conservation Areas, Gardens and Designed Landscapes (Inventory and non-Inventory) within 10 km of the nearest proposed turbine. We will assess the impact of the proposed development on Category C Listed Buildings and non-designated heritage assets that have non-statutory register (NSR) designation that are within 5km of the nearest proposed turbine.

We would be grateful if you could respond to the following points at your earliest convenience:

- Are you content that a 10 km study area from the outermost proposed turbines, informed further by the blade tip height ZTV, is sufficient as a study area for assessment of effects on the settings of heritage assets within your remit?
- Are you content with the proposed tiered approach to the assessment?
- Are you content with the proposed methodology for assessment on effects?
- Are there any specific assets beyond 10 km that would be you wish to see included in the assessment?
- Are the proposed visualisation viewpoints in the attached list acceptable and do you have any comments that you wish to make?

We would be grateful if you could provide your comments on these matters by 26 July 2019 (earlier if at all possible). Should you have any questions regarding this matter, please do not hesitate to contact me.

Yours sincerely,

Senior Archaeological Consultant

Encl:

- Proposed Assessment Methodology
- List of proposed visualisations
- Outer Study Area ZTV (with designations and indicative 10 km study area marked)



Proposed Surveys and Assessment Methodologies

Guidance

- 1.1
- The assessment will be carried out with reference to the following guidance documents:
- SNH & Historic Environment Scotland (2018) ‘Environmental Impact Assessment Handbook’
  - Chartered Institute for Archaeologists (2014) ‘Standard and Guidance for Historic Environment Desk-Based Assessment’.
  - Historic Environment Scotland (2016) ‘Managing Change in the Historic Environment: Setting’.
  - Planning Advice Note (PAN) 2/2011: Planning and Archaeology.

Proposed Study Area

- 1.2
- Two study areas will be used for the assessment:
- The Inner Study Area: the Proposed Development site, defined by the site red line boundary, within which turbines and associated infrastructure are proposed, will form the study area for the identification of heritage assets that could receive direct effects arising from the construction of the Proposed Development.
  - The Outer Study Area: a wider study area extending 10km from the outermost finalised proposed turbine locations will be used for the identification of cultural heritage assets whose settings may be affected by the Proposed Development (including cumulative effects).

Desk-based Assessment Method

- 1.3
- A desk-based assessment and a targeted field survey will be conducted covering the Inner Study Area. The purpose will be to identify all known heritage assets, designated or otherwise, that could be directly affected by the Proposed Development, and to inform an assessment of the archaeological potential of the Proposed Development site.
- 1.4
- Sources to be consulted for the collation of data will include:
- The Dumfries and Galloway (DGC) Historic Environment Record (HER)
  - Historic Environment Scotland’s (HES) on-line GIS Spatial Data Warehouse
  - National Record of the Historic Environment (NRHE)
  - Historic maps held by National Library of Scotland
  - Modern aerial photographic imagery available online
  - Historic Land-Use Assessment Data for Scotland (HLAmap)
  - Scottish Palaeoecological Archive Database (SPAD) (Coles et al, 1998<sup>1</sup>)
  - Any existing geotechnical data, including peat survey data if available
  - Other readily accessible published sources, including the previous environmental impact assessment for the operational Kilgallioch Wind Farm (SPR 2009<sup>2</sup>) and any reports referenced in HER/NRHE records.
- 1.5
- Data will be gathered for the Outer Study Area to identify designated assets that may be subject to effects on their setting and to provide baseline information for the assessment of

<sup>1</sup> Coles, G.M., Gittings, B.M., Milburn, P. and Newton, A.J. (1998) Scottish Palaeoecological Archive Database [online], available from <http://www.geo.ed.ac.uk/spad/>.  
<sup>2</sup> Kilgallioch Wind Farm Environmental Statement (2009).

setting effects. Sites whose settings will be assessed include Scheduled Monuments (SMs), Listed Buildings and Conservation Areas. There are no Inventory status Gardens and Designed Landscapes within 10km of the Proposed Development.

- 1.6
- Undesignated archaeological sites and features identified in the DGC HER as non-statutory register (NSR) sites and located within 5km of the Proposed Development site boundary will also be considered for potential effects on their settings from the Proposed Development.

Field Survey Method

- 1.7
- A walk-over field survey of the proposed development site will be carried out to record the baseline character of sites identified through the desk-based assessment and to identify any others not revealed through the desk-based study, and to record their baseline character, condition and heritage value. The field survey will have the following aims:
- to assess the present baseline condition of the regionally and nationally important heritage assets identified through the desk-based assessment;
  - to identify any further features of cultural heritage interest not detected from the desk-based assessment; and,
  - to assess the Inner Study Area for its potential to contain currently unrecorded, buried archaeological remains
- 1.8
- Identified sites will be recorded on pro-forma monument recording forms and by digital photography, and their positions (and where appropriate their extents) logged using a Global Positioning System (GPS). The survey data will be compiled in a GIS and used during the design iteration work. The results of the survey work will be provided to DGCAS for inclusion in the HER.
- 1.9
- Site visits to key heritage assets in the Outer Study Area will be carried out, where necessary and in as far as access is possible, to assess the predicted effect of the Proposed Development on their settings. Site visits will include any assets specifically identified by consultees as requiring assessment and those identified through analysis of the blade tip height Zone of Theoretical Visibility (ZTV) that lie within 5km of the Proposed Development, where it is considered, on the basis of professional judgement, that the effect on their settings could be significant.

Assessment Method

- 1.10
- The assessment of significance of effects will be undertaken using two key criteria: the sensitivity to change of the cultural heritage assets and the magnitude of effects, which measures the degree of change to the baseline condition of an asset resulting from the Proposed Development.

Assigning Sensitivity to Heritage Assets

- 1.11
- The sensitivity to change of cultural heritage assets reflects the relative weight given to them in Scottish Planning Policy 2014 (SPP). Table 10.1 summarises the relative sensitivity of key cultural heritage assets relevant to the Proposed Development.

Table 10.1: Sensitivity of Heritage Assets

| Sensitivity of Asset | Definition / Criteria <sup>3</sup>                                                                                                       |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| High                 | Sites of national importance, including:<br><br>Scheduled Monuments and sites proposed for scheduling<br><br>Category A Listed Buildings |

<sup>3</sup> Derived from ICOMOS (2011) & DMRB (2007)

|            |                                                                                                                                                                                                                                                                                                                                                                 |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Medium     | Sites of regional importance, including:<br><br>Archaeological sites and areas of distinctive regional importance<br><br>Undesignated archaeological sites and features identified in Council Historic Environment Records (HER) as non-statutory register (NSR) sites.<br><br>Category B Listed Buildings<br><br>Conservation Areas                            |
| Low        | Sites of local importance, including:<br><br>Archaeological sites of local importance<br><br>Category C Listed Buildings<br><br>Unlisted buildings and townscapes with local (vernacular) characteristics                                                                                                                                                       |
| Negligible | Sites of little or no importance, including:<br><br>Artefact find-spots (where the artefacts are no longer in situ and where their provenance is uncertain)<br><br>Unlisted buildings of minor historic or architectural interest<br><br>Poorly preserved examples of particular types of features (e.g. quarries and gravel pits, dilapidated sheepfolds, etc) |

Criteria for Assessing the Significance of Effects

- 1.12 The magnitude of effects will be assessed in the categories, high, medium, low and negligible and described in Table 10.2.

Table 10.2: Magnitude of Effects

| Level of Magnitude | Definition <sup>4</sup>                                                                                                                                                                                                                                                                                                                                                            |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High               | A fundamental change to the physical condition of an asset, leading to total loss of the asset or major alteration to its character.<br><br>Comprehensive change in the surroundings of an asset, such that its baseline setting is substantially or totally altered and key visual links and relationships with the surroundings are lost or substantially affected.              |
| Medium             | A material change to the physical condition of a heritage asset, resulting in partial loss or clear alteration of its character.<br><br>Considerable changes to the surroundings of an asset, such that the character of the asset and its baseline setting is partly and materially altered and key visual links and relationships with the surroundings are materially affected. |
| Low                | A slight but detectable change to the physical condition of a heritage asset, resulting in minor alteration of its character.<br><br>A slight but noticeable change in the surroundings of an asset, resulting in superficial alteration of its baseline setting while key visual links and relationships with the surroundings are unaffected.                                    |

<sup>4</sup> Derived from ICOMOS (2011) & DMRB (2007)

|            |                                                                                                                                                                                                                                                                                                   |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Negligible | A barely distinguishable change to the physical condition of a heritage asset.<br><br>A very slight and barely distinguishable change in the surroundings of an asset, resulting in no obvious alteration of its baseline setting or to key visual links and relationships with the surroundings. |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- 1.13 The sensitivity of the asset (Table 10.1) and the magnitude of the predicted change (Table 10.2) will be used to inform the professional judgement of the potential significance of the effects. Table 10.3 summarises the criteria for assigning significance of effects. Where two outcomes are possible through application of the matrix, professional judgement supported by reasoned justification, will be employed to determine the level of significance.

Table 10.3: Significance of Effects<sup>5</sup>

| Magnitude of Effect | Sensitivity of Asset |                  |                  |                  |
|---------------------|----------------------|------------------|------------------|------------------|
|                     | High                 | Medium           | Low              | Negligible       |
| High                | Major                | Major/Moderate   | Moderate/Minor   | Minor            |
| Medium              | Major/Moderate       | Moderate         | Minor            | Minor/Negligible |
| Low                 | Moderate/Minor       | Minor            | Minor/Negligible | Minor/Negligible |
| Negligible          | Minor                | Minor/Negligible | Minor/Negligible | Minor/Negligible |

- 1.14 Major and Moderate effects are considered to be ‘significant’ in the context of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations). Minor and Neutral effects are considered to be ‘not significant’.

Assessment of Effects on Setting

- 1.15 Historic Environment Scotland’s guidance document, 'Managing Change in the Historic Environment: Setting' (HES 2016), notes that:
- "Setting can be important to the way in which historic structures or places are understood, appreciated and experienced. It can often be integral to a historic asset's cultural significance."*
- "Setting often extends beyond the property boundary or ‘curtilage’ of an individual historic asset into a broader landscape context".*
- 1.16 The guidance also advises that:
- "If proposed development is likely to affect the setting of a key historic asset, an objective written assessment should be prepared by the applicant to inform the decision-making process. The conclusions should take into account the significance of the asset and its setting and attempt to quantify the extent of any impact. The methodology and level of information should be tailored to the circumstances of each case".*
- 1.17 The guidance recommends that there are three stages in assessing the impact of a development on the setting of a historic asset or place:
- Stage 1: identify the historic assets that might be affected by the proposed development;

<sup>5</sup> Based on DMRB (2007)

- Stage 2: define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced; and,
  - Stage 3: evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated.
- 1.18 Following this approach, for each cultural heritage asset where a potential effect on setting has been identified, the assessment of possible effects will adopt a four-stage approach.
- Identification of the characteristics of the setting of the asset;
  - Assessment of the sensitivity of that setting;
  - Identification of how the presence of the proposed wind farm would affect that setting (magnitude of effect); and,
  - Assessment of the significance of the effect.
- 1.19 Scoping Responses from Historic Environment Scotland (HES) and DGC Archaeology Service (DGCAS) have identified a number of Scheduled Monuments and non-designated heritage assets, as recommended for inclusion in the assessment for effects on their settings.

Scheduled Monuments

- Wood Cairn, cairn, Eldrig Fell (SM1953)
- Cairn na Gath, long cairn, Balmurrie Fell (SM1922)
- Caves of Kilhern, Chambered Cairn 450m SE of Dranigower Lodge (SM1928)
- Bennan of Garvilland, Fort (SM1955)
- Laggangarn stones, Laggangarn (SM90199 and Property in Care)
- Wells of the Rees, wells 500m NNE of Kilgallioch (SM2002)

Non-designated Heritage Assets

- Craigmoddie fermtoun (MDG2317)
- Linn's Tomb (MDG2327)
- East Rhins (ASA)

- 1.20 To aid the assessment visualisations (photomontages/wirelines) will be produced to inform the assessments for these assets; viewpoint locations (along with proposed visualisation type and the issue to be addressed) are listed in Table 10.4. All visualisations will be prepared by the LVIA consultants to SNH standards.

Table 10.4: Candidate Cultural Heritage Viewpoint List

| Asset name & Ref No                                           | Status             | Approx Grid Ref | Photomontage / Wireline                                      |
|---------------------------------------------------------------|--------------------|-----------------|--------------------------------------------------------------|
| Wood Cairn, cairn, Eldrig Fell (SM1953)                       | Scheduled Monument | NX 25242 68711  | Photomontage (cumulative with Kilgallioch)                   |
| Cairn na Gath, long cairn, Balmurrie Fell (SM1922)            | Scheduled Monument | NX 21260 67412  | Photomontage (cumulative with Kilgallioch and Artfield Fell) |
| Caves of Kilhern, Chambered Cairn 450m SE of Dranigower Lodge | Scheduled Monument | NX 19842 64420  | Photomontage (cumulative with                                |

|                                                           |                            |                |                                                                                      |
|-----------------------------------------------------------|----------------------------|----------------|--------------------------------------------------------------------------------------|
| (SM1928)                                                  |                            |                | Kilgallioch and Artfield Fell)                                                       |
| Bennan of Garvilland, Fort (SM1955)                       | Scheduled Monument         | NX 21533 62758 | Photomontage (cumulative with Kilgallioch, Glenchamber and Artfield Fell)            |
| Laggangarn stones, Laggangarn (SM90199)                   | Scheduled Monument and PiC | NX 22235 71667 | Wireline (site is within standing commercial forestry) (cumulative with Kilgallioch) |
| Wells of the Rees, wells 500m NNE of Kilgallioch (SM2002) | Scheduled Monument         | NX 22993 72326 | Wireline (site is within standing commercial forestry) (cumulative with Kilgallioch) |
| Craigmoddie fermtoun (MDG2317)                            | non-designated (NSR)       | NX 24400 72000 | Photomontage (cumulative with Kilgallioch)                                           |
| Linn's Tomb (MDG2327)                                     | non-designated (NSR)       | NX 24400 72620 | Wireline (site is screened by topography) (cumulative with Kilgallioch)              |

Cumulative Assessment

- 1.21 The assessment of cumulative effects on heritage assets will be based upon consideration of the effects of the Proposed Development on the settings of assets with statutory designations and non-statutory designations within 10km of the outermost turbines, in addition to the likely effects of other developments that are under construction, those that are consented but not yet built and those that are currently at the application stage(and for which sufficient detail is available upon which to develop and assessment). Proposed developments at the scoping or pre-application stage will not be included in the assessment; as such proposals are not fully formed and may be subject to changes that cannot be foreseen. The schemes to be included in the cumulative impact assessment will be those identified through the LVIA consultations with DGC and SNH.
- 1.22 The assessment of cumulative effects on the settings of heritage assets from the Proposed Development in combination with pre-existing developments (including the operational Arcleoch and Kilgallioch developments) will be addressed in the course of the assessment of effects of the Proposed Development alone, as pre-existing developments are part of the baseline environment.
- 1.23 The assessment will take into account the relative scale (i.e. size and number of turbines) of the identified developments, their distance from the affected assets, and the potential degree of visibility of the various developments from the assets under consideration. The use of cumulative wireline visualisations (and cumulative ZTVs where available) will be used to aid the assessment.

By email to:

[REDACTED]

[REDACTED]  
CFA Archaeology Ltd  
Old Engine House  
Eskmills Park  
Musselburgh  
EH21 7PQ

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

[REDACTED]  
T: 0131 668 8575

Our case ID: 300036919  
Your ref: KILX/010719/GM/01

26 July 2019

Dear Mr [REDACTED]

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)  
[Kilgallioch Wind Farm Extension](#)  
[Revised Assessment Methodology](#)

Thank you for your letter which we received on 8 July 2019 about the Kilgallioch Wind Farm Extension proposals, Dumfries and Galloway. We have reviewed the revised Assessment Methodology and ZTV submitted as part of this consultation for our historic environment interests. These include 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).

Dumfries and Galloway Council's archaeological and conservation advisory service 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.

**Revised Assessment Methodology**

We welcome the provision of an updated Assessment Methodology following our previous comments made at the EIA scoping stage (22 May 2019). In particular, we welcome the decision to undertake a fresh desk-based assessment and additional field survey work since work was undertaken in support of the consented Killgallioch Wind Farm scheme (Environmental Statement, 2009). We also welcome where the assessment work will be undertaken in accordance with updated guidance for the historic environment.

Additionally, we recommend that the emerging design and assessment work for the development should take into account the recently adopted Historic Environment Policy for Scotland (HEPS, 2019). This document sets core principles for understanding the historic environment and the management of change. The policies included in HEPS should be read alongside those within Scottish Planning Policy (SPP, 2014).

We understand that the assessment of significance of effects will be undertaken through assigning sensitivity to different heritage asset types and identifying the magnitude of effects. Here, we note that Paragraph 1.11 states that heritage assets are assigned relative

[REDACTED]

weight within Scottish Planning Policy (SPP, 2014). This is incorrect and we would highlight that heritage assets are given weight through designation. More information about our designations process can be found in our Designations Policy and Selection Guidance (DPSG, 2019).

We also recommend that Table 10.1 should not only assign sensitivity to individual heritage asset types but also make reference to setting. This is to ensure that impacts on setting are given weight in the assessment process. Table 10.2 should also make clear that changes to the setting of a heritage asset are not always visual, but rather how the heritage asset is understood, appreciated and experienced.

We are however broadly content with the proposed 10km outer study area selected for the assessment of setting impacts and welcome that cumulative impacts will be considered as part of this analysis. We also are in broad agreement with the visualisation viewpoints identified at Table 10.4. We would recommend, however, the inclusion of an additional visualisation viewpoint taken from south east of *Wood Cairn, cairn, Eldrig Fell (Scheduled Monument, Index no. 1953)* looking towards the monument and Eldrig Fell with the proposed development in the background.

**Further information**

A new Historic Environment Policy for Scotland (HEPS, 2019) was adopted on the 1<sup>st</sup> May 2019, which replaces the Historic Environment Scotland Policy Statement (HESPS, 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at [www.historicenvironment.scot/heps](http://www.historicenvironment.scot/heps).

Practical guidance and information about the EIA process can also be found in the EIA Handbook (2018). This is available online at <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0>

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on 0131 668 8575 or by email on [Alison.Baisden@hes.scot](mailto:Alison.Baisden@hes.scot).

Yours faithfully,

**Historic Environment Scotland**

# ScotWays

[redacted]  
**Sent:** 20 August 2019 12:16  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** RE: ScottishPower Renewables - Kilgallioch Windfarm Extension

Good afternoon [redacted]

Our scoping consultation response is now attached, along with our invoice.

Kind regards  
[redacted]

**From:** [redacted]  
**Sent:** 31 July 2019 16:43  
**To:** [redacted]  
**Subject:** RE: ScottishPower Renewables - Kilgallioch Windfarm Extension

Hi [redacted]

Likewise, thankyou for getting back to us so quickly. I've made a note of your preferred timescale and will do what we can to accommodate that.

The provision of a purchase order number is also appreciated.

Kind regards,  
[redacted]

**From:** [redacted]  
**Sent:** 31 July 2019 16:37  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** RE: ScottishPower Renewables - Kilgallioch Windfarm Extension

Dear [redacted]

Thank you very much for your quick response.  
If we could please proceed with the consultation, if you could include the following purchase order number on your invoice I would be most grateful.

- EE131346

Ideally, we would look for a response prior to the 20<sup>th</sup> August so that any information provided can be incorporated into the final design if required.

Many thanks and regards,  
[redacted]

[redacted] | **Principal Consultant** | ITPenergised  
Office: +44 (0)131 557 8325 | Mobile: + [redacted]

**From:** [redacted] >  
**Sent:** 30 July 2019 17:54  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** RE: ScottishPower Renewables - Kilgallioch Windfarm Extension

Good afternoon [redacted]

Thankyou for getting in touch; we are pleased to be consulted by ITPenergised directly.  
As a small charity, we charge a fee of £125 plus VAT towards our expenses for formal consultation responses; we are reliant on this income in order to be able to provide a consultation service. An invoice for £150 will be enclosed with our formal response.  
We are very busy with wind farm consultation requests at present. To that end, if you can confirm your preferred date of receipt for our consultation response, we will try to take that into account for you.

Looking forward to hearing from you,

Kind regards,  
[redacted]

[redacted]  
Senior Access Officer  
Scottish Rights of Way and Access Society (ScotWays)  
24 Annandale Street, Edinburgh EH7 4AN  
tel: 0131 558 1222  
web: [www.scotways.com](http://www.scotways.com)  
follow us on Twitter: @ScotWays  
find us on Facebook: ScotWays

Safeguarding Public Access in Scotland since 1845  
A company limited by guarantee, registered in Scotland  
Company number 24243  
Registered office as above  
Scottish Charity number SC015460

**From:** [redacted] [redacted]  
**Sent:** 30 July 2019 11:55  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** ScottishPower Renewables - Kilgallioch Windfarm Extension

Good morning [redacted]

The application for an extension to the operational Kilgallioch Windfarm in Dumfries and Galloway, for which you were consulted earlier in the year, is now progressing, and we wish to take this opportunity to invite you to provide any comments in response to the proposal.  
I attach your initial response dated 22 May, and a location plan of the proposed development for your reference. The proposed development will comprise up to 11 turbines, which will be up to 180m to tip height. We welcome your comments on the proposal, and will be happy to answer any questions you may have.

Kind Regards  
[redacted]

[redacted] | **Consultant** | ITPenergised  
Office: +44 (0) 131 557 8325 | Mobile: + [redacted]  
7 Dundas Street, Edinburgh, EH3 6QG [www.itpenergised.com](http://www.itpenergised.com)



Consultant  
ITPEnergised  
7 Dundas Street  
Edinburgh  
EH3 6QG

20/08/2019

Dear Ms [REDACTED]

**Your ref: Scottish Power Renewables – Kilgallioch Windfarm Extension  
PO No EE131346**

Thank you for your email of 30 July 2019 requesting a formal scoping response for the above proposed wind energy development

The National Catalogue of Rights of Way (CROW) shows DW146 is affected by the area outlined in red on your plan. This is recorded as an 'other' route. A map is enclosed with DW146 highlighted in orange. As there is no definitive record of rights of way in Scotland, there may be other routes that meet the criteria to be rights of way but have not been recorded as they have not yet come to our notice.

It may be of interest to note that DW146 forms part of the *Southern Upland Way* (SUW) which is affected by the area shown on your plan. This is promoted as one of *Scotland's Great Trails* by *Scottish Natural Heritage*.

You will no doubt be aware there may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. We note that the Core Paths Plan, prepared by Dumfries and Galloway Council's access team as part of their duties under this Act has been consulted in the preparation of the scoping report.

The scoping report notes differing sizes of study area, and *Figure 6.6 Blade Tip ZTV with Visual Receptors* shows visual receptors (recreational routes including core paths) within these areas. ScotWays is, however, aware of rights of way and other promoted routes which lie within the study areas which, it appears, have not been considered. Maps of wider search areas are available from the Society if required to inform the Environmental Impact Assessment.

As we understand that there is very little guidance regarding the siting of turbines in relation to established paths and rights of way, we would like to draw your attention to the following:

***Extract from the Welsh Assembly Government's Technical Advice Note on Renewable Energy (TAN 8)***

***Proximity to Highways and Railways***

*2.25 It is advisable to set back all wind turbines a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.*

Although there are no turbine positions shown on the *Turbine Developable Area* on *Figure 1.2* it appears that turbines within this area will be sited at a greater distance from the SUW than the guidance notes advise.

The construction access route as yet has not been selected so we cannot comment specifically upon that, however the scoping report states that the internal wind farm access routes will need to link up to those in the operational Kilgallioch site. To do this a new track must cross the SUW. We would anticipate that a draft Access Management Plan is drawn up to detail how public recreational access, particularly along the SUW, will be maintained during the lifetime of the proposed development and detail any diversions that may be required during the construction process. It should also require the provision of signage for access users and site personnel. We strongly recommend that this is written in consultation with the access team at Dumfries and Galloway Council.

As well as direct impacts on public access, impacts on recreational amenity are of interest to the Society. We are concerned about the impact the wind farm development will have on the views from the *Southern Upland Way* (SUW). As we are aware of a large number of wind farm applications along this nationally important route the Society anticipates that the cumulative impact on the length of the SUW, as well as this individual section, will be taken into account.

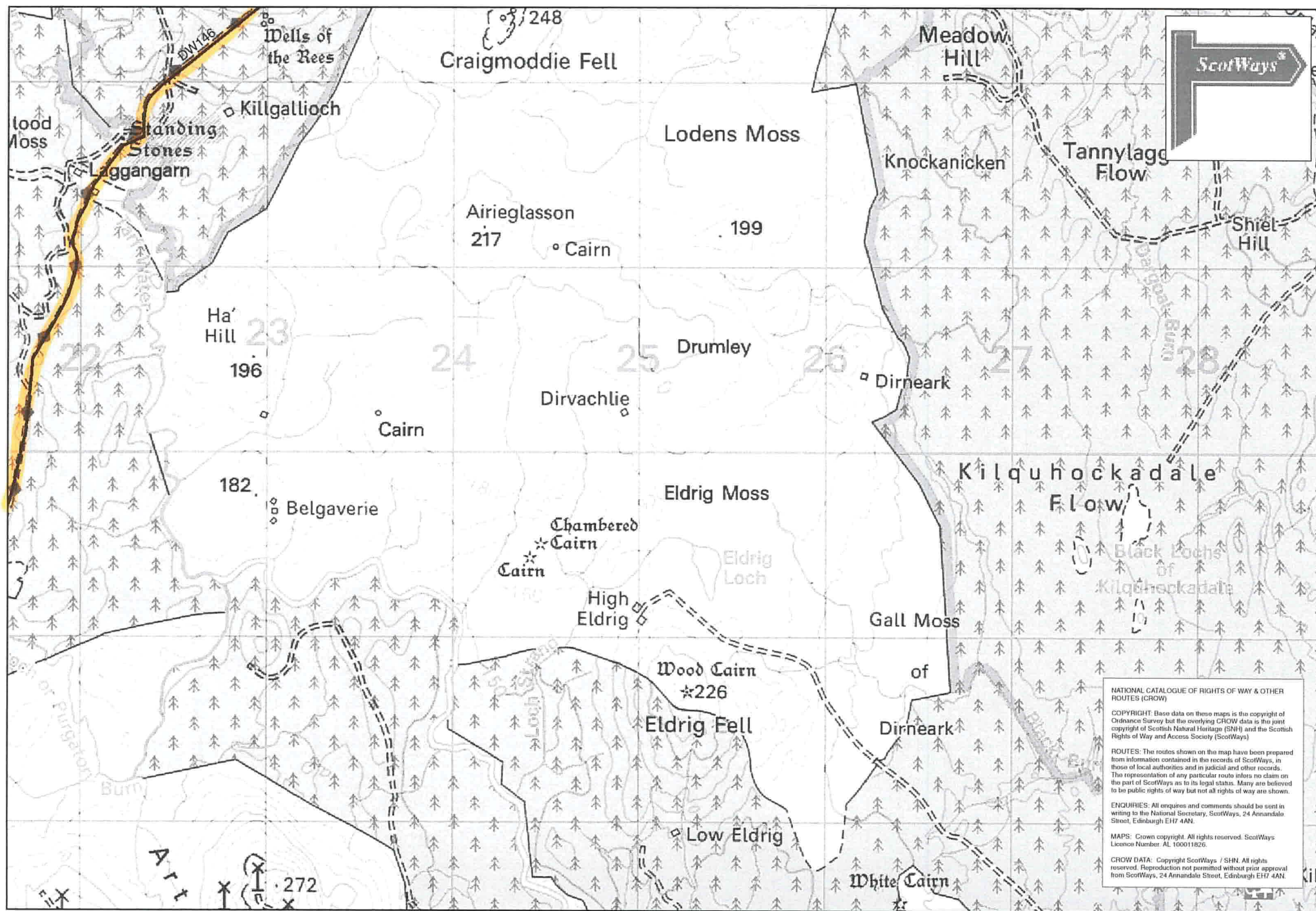
LVIA 6.2 para 109 states that *There is no proposal to limit the lifetime of the Development*. The Society is concerned to note that the scoping stage indicates that consent in perpetuity is being sought.

We charge a fee of £125 plus VAT for consultation requests: an invoice for this amount is enclosed. As a small charity we are reliant on the search income in order to continue to provide this consultation service. Please quote our invoice number when making payment.

I hope the information provided is useful to you. Please do not hesitate to contact us if you have any further queries.

Yours sincerely,

[REDACTED]  
Access Assistant



# SEPA

**From:** [REDACTED]  
**Date:** 31 October 2019 at 18:59 GMT  
**To:** [REDACTED]  
**Subject:** Kilgallioch Windfarm Extension – Peat Surveys

Dear [REDACTED]  
In My 2019, you provided a Scoping response regarding the proposed Section 36 application for Kilgallioch Wind Farm Extension in Dumfries & Galloway. We have been working with ScottishPower Renewables on the project and would like to provide some further information in response to your notes on peat survey work in particular, ahead of submission of the application.

In your letter, you made reference to the Scoping Report, which indicated that repeating peat depth surveys would be scoped out of the assessment, at locations previously surveyed as part of the original Kilgallioch Wind Farm application. You noted that areas which may have changed since previous survey work was undertaken should be re-surveyed, and provided details of the information to be provided with the submission and references to relevant guidance.

Since then, a programme of peat depth survey work has been undertaken to supplement and update the previous survey data. These surveys were undertaken to ensure appropriate data coverage in line with the 2017 Peatland Survey guidance, as summarised below:

- Stage 1 survey (11 July and 5 August 2019) to supplement the existing data, ensuring full coverage of the site on the basis of a 100 m grid spacing.
- Stage 2 survey following “design chill” (3 to 6 September, 1 and 2 October 2019), to record peat depth at each proposed turbine and hardstanding location, along the route of proposed access tracks, and at proposed infrastructure locations including construction compound, operations building, and borrow pit search areas. The following pattern of probing was adopted for Stage 2:
  - Probe at each proposed turbine location with a 10 m spaced cross-grid out to 50 m from the turbine centre to the north, south, east and west;
  - At least four probes at each proposed turbine hardstanding area;
  - Nine probes at/adjacent to the proposed operations building location and construction compound;
  - Three probes in the immediate vicinity of the proposed permanent met mast;
  - Generally every 50 m along proposed access tracks, plus approximately 10 m either side of each probe, perpendicular to the route of the track, with some minor exceptions where access was particularly challenging and sufficient data was available from Stage 1 probing and earlier probing data; and
  - Probes on an at least a 100 m grid within the two proposed borrow pit search areas.

In total, data has been obtained from 3,011 peat probe locations across the site area. The attached figure shows the distribution of peat depth survey locations from the above survey phases.

Peat sampling was undertaken using a hand auger, at proposed turbine and infrastructure locations. Peat samples were collected and dispatched to Envirolab laboratory and tested for moisture content, bulk density, and carbon content, in order to help characterise the peat at different locations and depths across the site. Sampling locations are illustrated on the attached figure.

The survey data is being used to complete a peat landslide hazard risk assessment and peat management strategy for the site, which will be reported as part of the submission.

We would be grateful for your comment on the above survey work, to confirm that it is in line with expectations or let us know if you have any queries or concerns.

Many thanks for any feedback you are able to provide,  
Jenny

[REDACTED] | **Environmental Planning Director** | ITPenergised  
Office: +44 (0)131 557 8325 | Mobile: + [REDACTED]

7 Dundas Street, Edinburgh EH3 6QG  
[www.itpengergised.com](http://www.itpengergised.com)

ITPEnergised incorporates Energised Environments Limited & ITPE Ltd.



**From:** Werritty, Jonathan <[REDACTED]>  
**Sent:** 22 November 2019 11:11  
**To:** [REDACTED]  
**Subject:** Kilgallioch Wind Farm Extension - peat surveys

[REDACTED]  
Further to your email to Simon Watt dated 31 October requesting comments on the peat survey work carried out on site I can confirm the following. The main infrastructure that is proposed on site is covered by the most recent probing and the sampling and the probe spacing looks to be acceptable. In short the survey looks to have been carried out in line with current guidance;

We are therefore satisfied that the additional survey work that has been undertaken on site, along with the previous survey work, provides a satisfactory basis on which to complete the peat landslide hazard risk assessment and peat management strategy for the site.

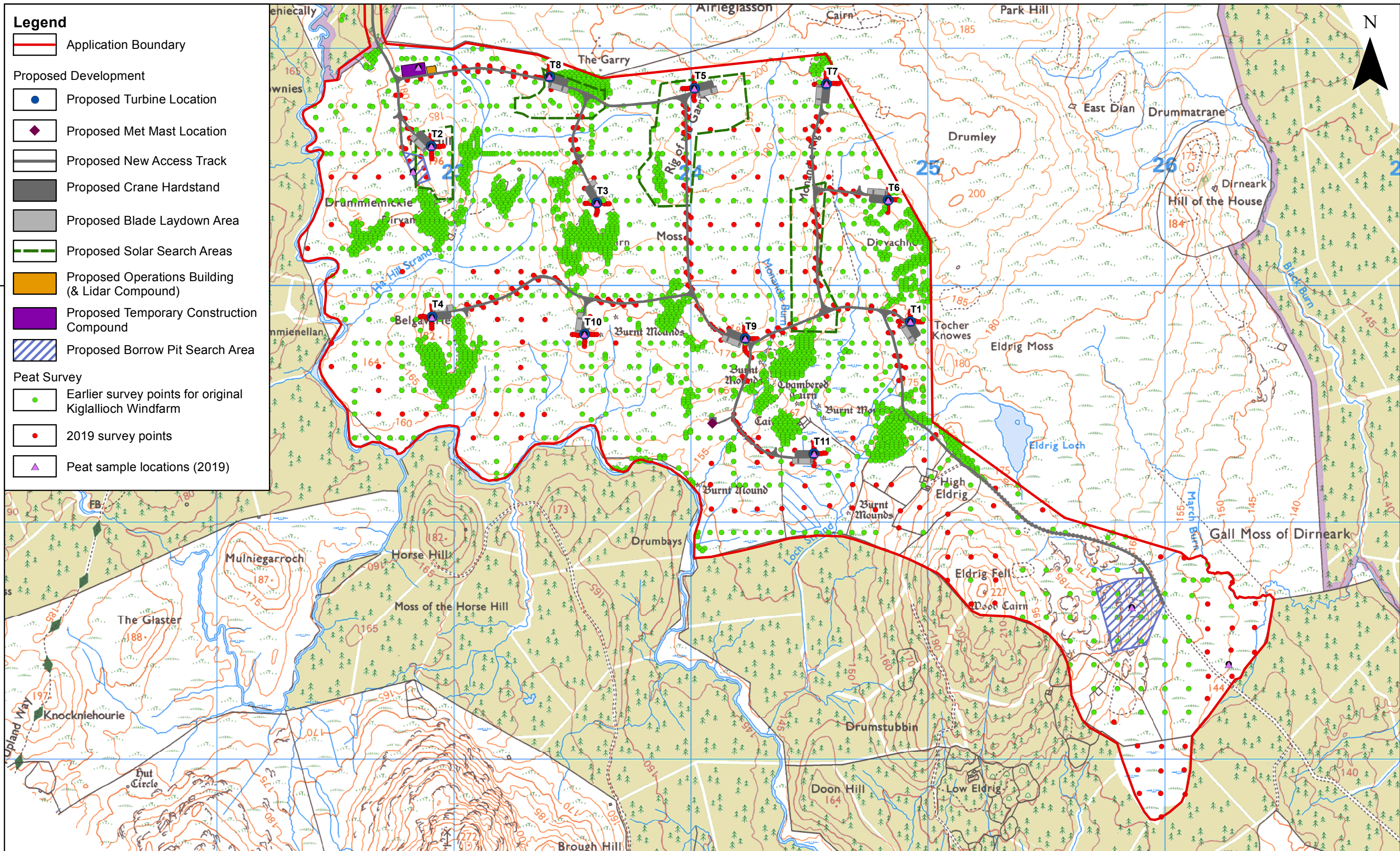
Please note that our previous comments with regards to a Habitat Vegetation Survey and updated Habitat Management Plan remain applicable.

Regards,

[REDACTED]  
Senior Planning Officer  
Planning SW  
Scottish Environment Protection Agency  
Silvan House  
231 Corstorphine Road  
Edinburgh, EH12-7AT  
Telephone (0131) 273 7373

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|     |            |    |              |
| A   | 31/10/2019 | JH | First Issue. |
| Rev | Date       | By | Comment      |

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| 1:15,000<br>Scale @ A3                                                              | 0 0.45 0.9 Km |
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## Kilgallioch Windfarm Extension

### Peat Survey

|        |               |                |
|--------|---------------|----------------|
| Drg No | EDI_1706_EIAR |                |
| Rev    | A             | Datum: OSGB36  |
| Date   | 31/10/19      | Projection: TM |
| Figure | SEPA_1        |                |

# RSPB

**From:** [REDACTED] >  
**Date:** 31 October 2019 at 13:59:11 GMT  
**To:** [REDACTED]  
**Subject:** FW: Kilgallioch Windfarm Extension Ornithology Surveys

Hi [REDACTED]  
Response below from RSPB, not had anything from SNH yet.  
I'm fine with this response, especially as they acknowledge that there is sufficient data. In light of the comments, I think that despite the very low risk, I will probably include a collision model result in the next draft of the EIA chapter just to cover all the bases, and will consider including golden plover in the assessment rather than scoping them out.  
Let's wait until we get the SNH one, but I think John Gibson is pretty pragmatic so am hopeful he'll be fine also.  
Kind regards  
Fiona

[REDACTED]  
  
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**From:** [REDACTED]  
**Sent:** 30 October 2019 09:05  
**To:** Alex Ash  
**Cc:** Blair Urquhart; [REDACTED]; Fiona Leckie; Louise Gunstensen  
**Subject:** RE: Kilgallioch Windfarm Extension Ornithology Surveys

Hello [REDACTED]  
  
Apologise for not getting back last week as I previously suggested.

Thank you for sending through the update on survey work undertaken at this site. We note that this has confirmed the presence of roosting hen harrier in similar locations to those recorded in 2007/8 and that winter bird activity in general recorded in 2018 was similar to usage recorded in 2007/8 and that therefore, no additional winter survey work needs to be undertaken.  
  
While we acknowledge that the information from the original Kilgallioch wind farm will be used to support the overall assessment of impact to birds at this site since this is more than ten years old, ideally, we would advise on a second year of survey work to fully inform the EIA particularly relating to wintering HH (we note that more flights were recorded during the winter months than those recorded over the summer period). However, we would agree that it should be reasonable to expect a robust enough assessment of potential impact to target species based on the data from updated survey work and past effort

although we would highlight the need to thoroughly assess impact in particular to roosting hen harrier which the updated survey work has confirmed present on site.  
  
We would also advise that displacement of roosting golden plover is also assessed in line with the results of updated survey work and previous survey effort and that the omission of a second updated survey for the winter period is made clear in the EIA and that any possible limitations for final assessment of impact based on this is acknowledged.

Kind regards,  
  
[REDACTED]  
  
[REDACTED]  
Senior Conservation Officer Scottish Lowlands and Southern Uplands

**Dumfries & Galloway Area Office**, The Old School, Crossmichael, Castle Douglas, Kirkcudbrightshire, DG7 3AP  
**Tel** 01556 670 478  
**Mobile** [REDACTED]

[rspb.org.uk](http://rspb.org.uk)

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**From:** [REDACTED]  
**Sent:** 17 October 2019 16:35  
**To:** [REDACTED] >  
**Cc:** [REDACTED]  
**Subject:** RE: Kilgallioch Windfarm Extension Ornithology Surveys

Hi [REDACTED]  
  
Thanks for getting back to me so quickly, We'll look forward to hearing back from you next week.

Thanks,

From: [REDACTED]  
Sent: Thursday, October 17, 2019 4:30 PM  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Kilgallioch Windfarm Extension Ornithology Surveys

Hello [REDACTED] – many apologies but this was on my mind and my immediate list to do but no, not as yet. We are going through a very busy time of structural change and recruitment such is my excuse but I will get back by the end of next week if not before.

Many thanks,

[REDACTED]  
Senior Conservation Officer Scottish Lowlands and Southern Uplands

Dumfries & Galloway Area Office, The Old School, Crossmichael, Castle Douglas, Kirkcudbrightshire, DG7 3AP  
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From: [REDACTED]  
Sent: 17 October 2019 16:24  
To: Julia Gallagher <[REDACTED]>  
Cc: Blair Urquhart <[REDACTED]>  
Subject: FW: Kilgallioch Windfarm Extension Ornithology Surveys

Dear [REDACTED] and [REDACTED]

As Fiona is currently on annual leave could you please let me know if you've responded to the email below?

Apologies if you've already done this,

Best Regards,

Alex

Alex Ash  
Senior Project Ecologist  
NRP Ltd

Mob: 07741 667695

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From: [REDACTED]  
Sent: 27 September 2019 23:33  
To: Julia Gallagher <>;  
Cc: [REDACTED]  
Subject: Kilgallioch Windfarm Extension Ornithology Surveys

Dear [REDACTED] and [REDACTED]

**Kilgallioch Windfarm Extension Ornithology Surveys**

We have been employed by SPR to complete bird surveys for their proposed extension to Kilgallioch Windfarm. This site is on the open ground adjacent to the commercial forestry plantations and the operational Kilgallioch and Airies windfarms. The only statutory designated site for birds within 20km of the Development is the Glen App and Galloway Moors SPA and SSSI (classified for breeding hen harrier). However, the nearest proposed turbine location is over 7 km from the closest point of this SPA.

A scoping opinion has already been received from SNH and RSPB – letters to the ECU dated 9 May 2019 and 16 May 2019 respectively.

SNH requested a discussion with the ECU and RSPB prior to scoping out of a second years breeding / non-breeding seasons, and RSPB noted that no consultation had been made post the first years' worth of survey.

We have completed a second breeding season of survey and now seek agreement that, on review of the survey findings to date, there is no requirement for a further non-breeding season of survey work. It is our professional judgement that a robust assessment can be made using the current two breeding (2018, 2019) and one non-breeding (2018/2019) seasons of survey along with data from the 2007-2009 surveys undertaken across the same area as part of the development for the now operational Kilgallioch Windfarm site.

A summary report is attached for the survey work completed between April 2018 and August 2019.

From the report you will note that within the survey buffers very few flights were observed and no signs of breeding by species of high or moderate conservation interest were identified.

Non breeding season surveys indicate that the hen harrier roost locations identified and used in the 2018/2019 non-breeding season are the same locations as those used during the previous survey work in 2007 and 2008. The number of hen harrier using the roosts appear to be similar in 2018/2019 to 2007 and 2008. The number of golden plover using the survey area during the non-breeding season is small, with the majority of sightings being flocks numbering just 10s of birds.

The current SNH Guidance recommends “...*two years of survey will be required unless it can be demonstrated by the developer that a shorter period of survey is sufficient*”.


We consider the data collected to date (April 2018 – August 2019), especially when examined with the large amount of previous survey data providing context, is sufficient to complete a robust assessment of the proposed development and we therefore propose that there is no requirement to complete further surveys in the non-breeding season of 2019/2020.

**We are therefore seeking confirmation from SNH and RSPB that a second non-breeding season of surveys will not be necessary at the Kilgallioch Windfarm Extension site.**

I hope the information provided here is adequate to allow you to provide us with your decision on our query, however if you have any further questions please contact me.

Kind regards

Fiona Leckie

  
Director  
Senior Project Ecologist

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