



# Technical Appendix 5.2

## Gatecheck Report

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Gatecheck Report as Issued to the ECU in July 2019





# Kilgallioch Windfarm

## Extension

### Gatecheck 1 Report

July 2019



**SCOTTISHPOWER  
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### FIGURES

Figure 1 Site Location Plan



# 1 Introduction

## 1.1 Introduction

1. ScottishPower Renewables, (hereafter referred to as “the Applicant”) intends to apply to the Scottish Ministers for consent under Section 36 of the Electricity Act 1989 for the construction and operation of an extension to the existing Kilgallioch Windfarm (Operational Kilgallioch Windfarm) (hereafter referred to as the “proposed Development”), on land approximately 9.5 kilometres (km) north-west of Kirkcowan in Dumfries and Galloway (refer to Figure 1).

## 1.2 Background

2. The Applicant submitted an Environmental Impact Assessment (EIA) Scoping Report for the proposed Development in April 2019 to the Scottish Government Energy Consents Unit (ECU). The Applicant received an EIA Scoping Opinion in June 2019.

3. This Section 36 Gatecheck Report provides ECU with an update on the status of the proposed Development and progress with the EIA Report. It summarises the design iteration process which the Applicant has undertaken to date (refer to Section 3) and how the Applicant intends to respond to the points raised within the EIA Scoping Opinion (refer to Sections 3 to 14).

# 2 Scoping Responses

4. Scoping responses were received from the following organisations (refer to Table 2-1).

Table 2-1: Scoping Response Received

Consultee	Response
Dumfries & Galloway Council	Cree Valley Community Council
Historic Environment Scotland	New Luce Community Council
Scottish Environmental Protection Agency	Old Luce Community Council
Scottish Natural Heritage	British Horse Society
Crown Estate Scotland	British Telecommunications plc
Defence Infrastructure Organisation	Joint Radio Company Limited
Edinburgh Airport	Fisheries Management Scotland
Glasgow Airport	Galloway Fisheries Trust
Glasgow Prestwick Airport	Nith District Salmon Fisheries Board
Highlands & Islands Airports Ltd	RSPB Scotland
NATS Safeguarding	Scottish Rights of Way and Access Society (Scottways)
Scottish Water	Visit Scotland
Transport Scotland	Marine Scotland
Scottish Forestry	

5. No responses to the scoping request were received from the following consultees (refer to Table 2-2).

Table 2-2: No Scoping Response Received

Consultee	Response
Urr District Salmon Fisheries Board	Scottish Wildlife Trust
Nith Catchment Fisheries Trust	Scottish Wild Land Group
Civil Aviation Authority	Kirkcowan Community Council

Consultee	Response
Mountaineering Scotland	Barrhill Community Council
John Muir Trust	

# 3 Design Iterations

## 3.1 Scoping Design

6. In April 2019, as part of the EIA Scoping Report, the Applicant used an indicative turbine layout for the purposes of compiling an Indicative Zone of Theoretical Visibility (ZTV) of the proposed Development and identifying proposed landscape and visual viewpoint locations. This layout comprised 11 wind turbines up to 180m to tip.

## 3.2 EIA Scoping Opinion Comments on Design

7. The following comments were received from ECU and consultees on the design of the proposed Development presented in the EIA Scoping Report (refer to Table 3-1).

Table 3-1: EIA Scoping Opinion – Design

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Scottish Government - Energy Consents Unit (ECU)	Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed Development will be required, and would request that they are kept informed of on-going discussions in relation to this.	7	The Applicant will arrange Gatecheck 1 and 2 meetings with ECU as required, and keep ECU informed of any key developments.	N/A
New Luce Community Council (NLCC)	The proposed 180m tip height is much larger than those consented in the area and will result in additional significant impacts on areas further from the development and into New Luce community. This needs to be justified within the application.	A31	The EIAR will include a chapter on the design process and reasoning for any chosen development parameter (turbine size / turbine location / associated infrastructure etc).	The Applicant has responded directly to NLCC on the matters raised in their scoping response (04 July) and met with NLCC on the 10 July.

## 3.3 Design Iterations

8. Since the submission of the EIA Scoping Report and the receipt of the EIA Scoping Opinion the Applicant has undertaken a design process to maximise the capacity of the proposed Development while minimising the environmental impacts. Design iterations have taken into consideration the existing on-site environmental and engineering constraints to avoid watercourses, areas of deep peat and cultural heritage assets.

9. Furthermore, a study was undertaken in April 2019 to determine the feasibility of developing ground mounted solar panels within the site. The study considered site topography, potential solar irradiance and the known constraints on site based on previous survey work for the Operational Kilgallioch Windfarm and desk based assessment. The study arrived at six potential developable areas across the site. The six areas were re-examined in July 2019 once field surveys had been progressed for

the proposed Development and amended to reflect the current local constraints to development with particular regard to solar.

### 3.4 Future Design Iterations

<sup>10</sup> The Applicant, together with the EIA team, have gathered environmental baseline information for the site across the various technical disciplines to identify a design layout that considers the environmental constraints identified and the consultee opinions received to date. Details of the design iterations leading to a finalised design will be provided within Chapter 3 of the EIA Report.

## 4 EIA Report Requirements

<sup>11</sup> The following comments were received as part of the EIA Scoping Opinion on the EIAR.

Table 4-1: EIA Scoping Opinion – EIAR

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ECU	Scottish Ministers expect the EIA report to consider in full all consultation responses received.	5	Noted. This table draws on how/where they will be addressed within the EIAR.	N/A
ECU	Scottish Ministers are satisfied with the scope of the EIA set out at Table A of the scoping report.	5	Noted.	N/A
ECU	The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	6	The EIAR will contain tables at the end of each technical chapter outlining proposed mitigation. There will also be a separate summary chapter at the end of EIAR Volume 1 detailing all mitigation measures proposed within the EIAR.	N/A
ECU	When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	7	ITPE to provide similar table to this within an EIAR appendix cross referencing to where in the EIAR the matters are addressed.	N/A
Dumfries & Galloway Council (D&GC)	Content with the proposed topics to be covered and structure of the proposed EIA Report.	A11	Noted.	N/A
Scottish Environment Protection Agency (SEPA)	List and format of information to be provided as part of the EIAR. Further detail provided within Appendix 1 of the SEPA Scoping Response.	A17	Noted. The EIAR will follow the guidance within Appendix 1 of SEPA's response	N/A

Old Luce Community Council	OLCC is quite happy with the scoping report for the extension of the Operational Kilgallioch Windfarm.	A34	Noted.	N/A
Crown Estate	The assets of Crown Estate Scotland are not affected by this proposal and they have no comments to make.	A46	Noted.	N/A

## 5 Planning and Policy

<sup>12</sup> The following comments were received as part of the EIA Scoping Opinion on planning policy.

Table 5-1: EIA Scoping Opinion – Planning Policy

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
New Luce Community Council (NLCC)	When there are alternatives available and many controversial questions relating to rural landscapes, why is new Onshore Wind strategically necessary in the context of the Scottish Government aim to meet 100% Scotland's electricity needs from renewables by 2020.	A32	There are targets well beyond 2020, none are a cap and onshore wind is the most cost effective way of decarbonising the UK's energy supply. The Planning Statement will address comments in relation to planning policy and outline national targets.	N/A
NLCC	With regard to Section 9 (Electricity Act 1989) we do not see much sign of the Scottish Government's commitment to the Wigtownshire Moors.	A32	Question directed at Scottish Government. No action for SPR.	N/A

## 6 Landscape and Visual

<sup>13</sup> The following comments were received as part of the EIA Scoping Opinion on the landscape and visual assessment.

Table 6-1: EIA Scoping Opinion – Landscape and Visual

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ECU	No additional viewpoints have been suggested. However, the council's Landscape Architect has not commented. Any comments will be forwarded on to the developer when response has been received. The final viewpoints require to be agreed with the Energy Consents Unit in consultation with the Planning Authority and Scottish Natural Heritage (SNH).	6	The Applicant has undertaken further consultation directly with the D&GC Landscape Officer to agree requested additional viewpoints within the LVIA.	Ongoing consultation between the Applicant, D&GC and SNH underway.

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ECU	The Night Time Assessment detailed in section 6.3.5 of the scoping report must include agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.	6	As above.	N/A
SNH	The methodologies are appropriate in terms of LVIA, cumulative LVIA and the approach to assessing landscape and visual effects, also viewpoint assessment. For visualisation production the scoping report refers to the correct guidance.	A25	Noted.	N/A
SNH	Consideration should be given to turbine lighting bearing in mind the current situation with regard to radar activated lighting and the CAA's present position on the subject.	A25	The Applicant is undertaking direct consultation with D&GC and will follow CAA guidance on turbine lighting.	N/A
SNH	The preliminary viewpoints appear to be well spaced and limited to those viewpoints where all turbines will be visible to some degree, we are satisfied at this point.	A26	Noted.	N/A
D&GC	Full landscape response outstanding due to resource issues.	A8	Noted. The Applicant is undertaking direct consultation with D&GC following scoping response.	N/A
D&GC	Landscape and visual impact forms one of the development management considerations within Part 1 of LDP Policy IN2.	A8	Noted.	N/A
D&GC	With regards to the Dumfries & Galloway Windfarm Landscape Capacity Study (DGWLCS) the proposed turbines are located within the Glentroll unit of the Plateau with Forest Landscape Character Type (LCT17a). The DGWLCS gives this LCT an overall High to the Very Large typology turbine type (over 150m) for both landscape and visual sensitivity, principally due to cumulative effects that would be likely to occur with some operational wind farms which comprise substantially smaller turbines and, on the Galloway Hills, Merrick Wild Land Area (WLA) and smaller scale diverse landscape features.	A9	Noted. The LVIA will reference the DGWLCS where appropriate.	N/A
D&GC	Cumulative effects are likely within the Plateau with Forest Landscape Character Type (LCT) (17a) given	A10	Noted. A comprehensive cumulative assessment	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
D&GC	large number of consented / operational development in the area and different scales of turbine proposed. Key opportunities and constraints to wind farm development within the LCT 17a are outlined and should be considered within the LVIA.	A11	Noted. The LVIA will reference the DGWLCS where appropriate.	N/A
Cree Valley Community Council (CVCC)	No legitimate reason to scope out proposed elements from the landscape assessment - Table 6.3 of the scoping report should be rejected. To scope out effects on the Dark Sky Park seems unreasonable as the proposed turbines are over 150m tall ... should be properly assessed and the local astronomical society (Galloway Forest Astronomical Society) must be consulted. There is a need to assess the effects further within all of the Dumfries and Galloway Regional Scenic Areas and the Merrick WLA.	A28	The objective of the LVIA is to focus on the likely significant effects and the scoping report is reflective of this approach. Areas of the LVIA that have been scoped out are considered to not be significantly affected by the proposals given either the distance to the site, their sensitivity and or limited visibility of the proposed Development.	The Applicant met with CVCC on 07/05/19 to discuss the project and responded to their scoping response via letter in July 2019.  The Applicant to consult with Galloway Forest Astronomical Society.
CVCC	The DG Landscape Assessment (1998) cannot be 'ignored' on the basis that it was written at a time when there was little windfarm development across Scotland, it would make a mockery of the planning system.	A28	The DG landscape assessment (1998) is not the current Landscape Characterisation document for the area, SNH revised the study early 2019. SNH has also advised that Capacity Studies on particular types of development should also be referenced i.e. for wind developments, in this case DGWLCS.	N/A
CVCC	The proposal to have a 10km study area for potential effects on landscape character is insufficient as view from within the Galloway Hills RSA would definitely be affected.	A28	As previous comment on likely significant effects.	N/A
NLCC	The proposed Development is manifestly 'infill', with yet another turbine size and design, and so does not respect guidelines on cumulative impacts. (citing the DGWLCS and SNH 2012, 2015 and 2017 guidelines).	A31	The LVIA will assess the cumulative effects of the proposed Development, with the existing cumulative situation incorporated into the baseline conditions as the SNH guidelines on cumulative assessment advocate. See SNH (March 2012) <i>Assessing the Cumulative Impact of Onshore Wind Energy Proposed Developments</i> .	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
NLCC	To the NLCC it does not appear that the interests of the Galloway Hills WLA are being considered at all. This observation is set against a growing groundswell of support for a Galloway National Park.	A31	The objective of the LVIA is to focus on the likely significant effects. The scoping report is reflective of this approach and it is not considered likely that the proposed Development could result in a significant effect on the Merrick WLA. It is accordingly scoped out of the detailed assessment.	N/A

## 7 Hydrology, Hydrogeology and Geology

14. The following comments were received as part of the EIA Scoping Opinion on hydrology, hydrogeology and geology.

Table 7-1: EIA Scoping Opinion – Hydrology and Hydrogeology

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ECU	Scottish Water should be consulted to confirm whether there are any Scottish Water assets which may be affected by the development and investigate the presence of any private water supplies which may be impacted by the development.	N/A	Noted. Scottish Water consulted as part of the Scoping process and have confirmed no assets in the area (see response below).	The D&GC EHO has also been consulted (19 June) requesting any PWS data.
ECU	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment, the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), should be followed.	N/A	Noted, a PSHRA will be undertaken and submitted as part of the EIA Report.	N/A
SNH	Scope of the assessments appears to be comprehensive and have no further comments at this stage. It is crucial to establish that there is no hydrological link between the proposed wind farm and the Kirkcowan Flow SSSI/SAC which would lead to an adverse impact on both.	A26	Noted. The EIAR will discuss and assess any potential impacts and connectivity on the SAC/SSSI.	N/A
SEPA	Areas identified as Groundwater Dependent Terrestrial Ecosystems (GWDTE) must be mapped. A buffer of	N/A	Noted. Habitats indicative of potentially moderate	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
SEPA	100m around GWDTE for all excavations shallower than 1m, and 250m for excavations deeper than 1m, should be applied. If not achievable, a detailed site specific risk assessment will be required.	A18	groundwater dependency have been identified across the site although are likely to be largely or entirely rainwater/ surface water fed. A detailed risk assessment will be carried out for any affected areas.	D&GC responses 18 July confirming there are no PWSs within the study area.
SEPA	Private water supplies should be assessed and included within the scope of the assessment. If no additional PWS are identified, then no further assessment of impact is required but this can only be determined once an updated assessment is undertaken.	A18	The D&GC EHO has been consulted (19 June) requesting any PWS data.	N/A
SEPA	No concern with the intention to assess flood risk within the relevant EIA Report chapter rather than produce a standalone Flood Risk Assessment.	A18	Noted.	N/A
The Royal Society for the Protection of Birds (RSPB)	Note and support the update to survey of GWDTEs around areas of proposed infrastructure and note and agree with the planned survey to update peat condition through peat probing survey work.	A64	Noted.	N/A
Glasgow Prestwick Airport (GPA)	GPA agree with the proposed scope and methodology.	A56	Noted.	N/A
Galloway Fisheries Trust (GFT)	There are significant amounts of deep peats in the proposed work area. The development should consider undertaking peatland restoration in appropriate areas to compensate for any peat damage caused by the wind farm construction. The upper Tarf Water catchment suffers from acidification which has been exacerbated by nearby extensive conifer afforestation and in particular drainage of the deep peats for both forestry and grazing improvements. This acidification has impacted on wild fish populations. The disruption of peat soils would be expected to deteriorate water quality particularly by lowering pH. Monitoring for changes in pH needs to be carefully designed as pH levels will fluctuate depending on river flows and time of year. GFT request the opportunity to comment on any water quality monitoring plan as we have extensive experience monitoring acidification in Galloway.	A52	Noted. Engagement with GFT will be undertaken with respect to peat excavation and restoration proposals, and proposed water quality monitoring.	Engagement with GFT will be undertaken with respect to peat excavation and restoration proposals, and proposed water quality monitoring.

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Marine Scotland (MS)	Survey data should be used to draw up appropriate site specific mitigation measures and a robust integrated water quality and fish population monitoring programme to be carried out at least 12 months before construction, during construction and for at least 12 months after construction is complete.	A76	Noted, appropriate monitoring proposals will be included as a commitment in the EIA Report and/or Construction Environmental Management Plan.	N/A
MS	The EIA should consider the potential impacts on water quality and fish populations associated with the existing acidification problems in the area.	A76	Noted.	N/A
MS	The EIA should consider the potential cumulative impact of adjacent wind farm developments on water quality and fish populations, particularly in the selection of suitable control sites in the proposed monitoring programme.	A76	Noted, a cumulative assessment will be undertaken.	N/A
Scottish Water	No objection to the proposed Development. There is no public Scottish Water infrastructure within the vicinity of this proposed Development. There are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.	A66	Noted.	N/A
CVCC	This should not be scoped out and any assessment should include a study into the downstream flood risk.	A29	Noted. An assessment of hydrological effects will be included in the EIA, and flood risk will be assessed.	N/A

## 8 Ecology and Biodiversity

The following comments were received as part of the EIA Scoping Opinion on ecology and nature conservation.

Table 8-1: EIA Scoping Opinion – Ecology and Nature Conservation

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
SNH	Agree with the scope of surveys and satisfied that those that have been scoped out are acceptable for legitimate reasons.	A26	Noted.	N/A
SNH	In relation to Kirkcowan Flow SAC we confirm that a Habitats Regulations Assessment (HRA) will be required and as part of an Appropriate Assessment (AA).	A26	A HRA will be prepared alongside the EIA.	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
SNH	Note the recent guidance on bat surveys, released in January 2019.	A26	The January 2019 bat survey guidance has been adhered to in planning the bat surveys.	N/A
SEPA	Areas within the proposed Development which may have changed since the previous National Vegetation Classification (NVC) should be re-surveyed. Any areas which were previously subject to habitat management measures and may now fall within this development area must also be re-surveyed.	A18	An updated NVC survey has been completed covering up to 250m from the development area /proposed access routes. An updated map will be included within the EIA Report.	N/A
RSPB	There are no plans to update habitat survey work since it is considered that there has been no material change to the habitat since surveys were undertaken for the Operational Kilgallioch Windfarm. RSPB advise that the EIA clearly evidences this and that adequate baseline material on existing habitat is provided in support of the application. In addition, given the significant time lapse since the survey was undertaken in 2008/09 it is likely that changes in grazing management over this time has altered the baseline condition of habitats.	A64	The NVC survey was updated and will be used as a reference to update the Phase 1 habitat survey results (from 2010).	N/A
Scottish Forestry	Having reviewed the location plan and the scoping report the extension to the development will not involve further tree felling and on this basis we conclude that there will be no significant impacts on trees, woodland and forests and do not have any comments to make.	A77	Noted. Any proposed felling to facilitate access or cable laying will be noted and the area and effects reported within the EIA.	N/A
GPA	GPA agree with the proposed scope and methodology.	A56	Noted	N/A
Fisheries Management Scotland (FMS)	No concerns. The proposed Development falls within the district of the Bladnoch District Salmon Fishery Board, and the catchments relating to the Galloway Fisheries Trust. Advises consultation with these organisations.	A51	Noted. The Galloway Fisheries Trust was consulted as part of the scoping process.	N/A
GFT	Due to the importance of the Bladnoch SAC it would be desirable if the Habitat Restoration Plan considered possible works on the watercourses lying within the development area.	A52	Noted. An outline Habitat Management Plan will be included alongside the EIA.	N/A
GFT	There are a number of watercourses both within and bordering the development area. These watercourses are all part of the River Bladnoch catchment. The Bladnoch and many of its tributaries are designated as a SAC for Atlantic salmon. The Tarf Water is designated under the SAC designation and runs along much of the west and south edge of the development. Various Tarf tributaries drain the site including the Back Burn, Ha' Hill Strand,	A52	GFT commissioned by the Applicant to undertake fishery surveys at the site.	N/A



Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	Monadie Burn and Loch Strand Burn. These watercourses should be surveyed in the planned fish surveys as they may support fish species including freshwater eels, trout and salmon – these watercourses may require water crossings and are close to construction works and so may suffer reduced water quality. GFT have found wild salmon in the Loch Strand Burn in the past.			
GFT	GFT provided a wide range of fisheries expertise and assistance during the construction of the Operational Kilgallioch Windfarm. Many lessons were learned by GFT and SPR. GFT wish to provide comment on proposed fish survey methodology etc.	A52	GFT commissioned by the Applicant to undertake fishery surveys at the site. Information gathered as part of their surveys for monitoring at the Operational Kilgallioch Windfarm will supplement their report.	N/A
MS	MS advises that the developer consults our generic scoping guidelines which provide details regarding potential impacts on fish populations associated with wind farm developments.	A75	Noted.	N/A
MS	Site characterisation surveys to assess the presence and abundance of fish species within and downstream of the proposed development area should be undertaken.	A75	GFT has been commissioned to undertake the fishery surveys at the site.	N/A
MS	Survey data should be used to draw up appropriate site specific mitigation measures and a robust integrated water quality and fish population monitoring programme to be carried out at least 12 months before construction, during construction and for at least 12 months after construction is complete.	A76	Noted, appropriate monitoring proposals will be included as a commitment in the EIA Report and/or Construction Environmental Management Plan.	N/A
MS	The EIA should consider the potential impacts on water quality and fish populations associated with the existing acidification problems in the area.	A76	Noted.	N/A
MS	The EIA should consider the potential cumulative impact of adjacent wind farm developments on water quality and fish populations, particularly in the selection of suitable control sites in the proposed monitoring programme.	A76	Noted, a cumulative assessment will be undertaken.	N/A
MS	The Bladnoch District Salmon Fishery Board and Galloway Fisheries Trust should be consulted for information regarding local fish populations.	A76	GFT has been consulted and provided a scoping response. The Bladnoch DSFB will be consulted as part of the EIA.	N/A
Nith District Salmon Fisheries Board (NDSFB)	The proposed wind farm development is not within the River Nith catchment.	A62	Noted.	N/A

## 9 Ornithology

The following comments were received as part of the EIA Scoping Opinion on ornithology.

Table 9-1: EIA Scoping Opinion – Ornithology

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
SNH	Agree with the scope of surveys, strongly recommend the developer and or their consultants discuss with us and RSPB before second breeding/non-breeding seasons are potentially scoped out.	A26	The Applicant will consult SNH with regard the second non-breeding season, as second breeding season of survey is currently underway.	The Applicant to re-consult with SNH.
SNH	Collision Risk Analysis should include using the standard Band method.	A26	The CRM will be completed for species should the level of flight activity indicate it is necessary.	N/A
RSPB	Agree with the species selected however would advise that the scoping out of species is premature until the second season of breeding bird survey work has been completed (Aug 2019).	A64	Noted and agreed. Second season of breeding bird survey work is underway.	N/A
RSPB	Hen harrier and golden plover are the most frequently recorded species through updated survey work which corresponds with survey undertaken in 2008/09 for the Operational Kilgallioch Windfarm. We would advise that EIA to these species is given careful consideration.	A63	Noted.	N/A
RSPB	RSPB do not have a record of being consulted on the results of the first breeding and wintering bird surveys.	A63	RSPB has not yet been consulted to date. This will be done shortly in parallel to SNH.	Consultation with RSPB to be undertaken.
RSPB	We note that it is recommended that connectivity to the Glen App SPA is scoped out of this assessment due to the assessment made for Operational Kilgallioch Windfarm that no connectivity existed. Given that this development is within 10km (7km) from the SPA we would advise that the assessment for connectivity remains scoped in since the distance is within foraging range for this species (SNH guidance Assessing Connectivity with SPAs Version 3 2016).	A63	The SNH Guidance states that "in most cases the core range should be used when determining whether there is connectivity between the proposal and the qualifying interests". The core range for hen harrier is stated as 2km in the Guidance therefore this has been used to scope the Glen App SPA from further assessment as no significant effects are anticipated.	N/A
RSPB	Recommend that results of post-construction monitoring for the Operational Kilgallioch Windfarm are used to inform likely assessment of potential impact from the proposed Development.	A64	Noted.	N/A
GPA	GPA agree with the proposed scope and methodology.	A56	Noted.	N/A

## 10 Noise

17. The following comments were received as part of the EIA Scoping Opinion on noise and vibration.

Table 10-1: EIA Scoping Opinion – Noise

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
ECU	The cumulative noise assessment should be carried out in line with relevant legislation and standards and include details about the representative background noise survey locations agreed with the relevant Planning Authority.	N/A	The D&GC EHO has been consulted directly to agree methodology, noting that no baseline noise survey is proposed for the Development given the number of operational wind developments in the area and in line with best practice.	The Applicant has consulted with D&GC, response awaited.
GPA	GPA agree with the proposed scope and methodology.	A57	Noted.	N/A

## 11 Archaeology and Cultural Heritage

18. The following comments were received as part of the EIA Scoping Opinion on cultural heritage.

Table 11-1: EIA Scoping Opinion – Cultural Heritage

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
D&GC	The Council's Archaeology Service (DGCAS) does not agree with this list of proposals for exclusion from further work. The archaeology service considers that a new DBA will be required for the EIA, and that a targeted walkover of those sites whose spatial extent was not recorded in the original survey ... should be undertaken.	A2	The previous DBA has been reviewed and updated.  A targeted walk-over has also been carried out.	N/A
D&GC	In the intervening years since the last survey improved aerial imagery has enabled more sites to be visible and their extents recorded. Furthermore, continued maintenance of the HER means that the significance of some sites within the development area has altered since the original DBA.  A walkover survey will be required to assess the extent and condition of remains not covered in the 2009 survey, or where there is a difference in the spatial attributes assigned by the original DBA and by the Council's HER.	A3	New data has been acquired from the HER.  The site survey has focused on the assets where their recorded extents have been reviewed by DGCAS (as requested) and target assets identified as national/regional importance. The EIA will review their significance and assess potential effects.	N/A
D&GC	It is not agreed by the archaeology service that the setting of undesignated assets more	A4	The applicant proposes to increase study area to 10km from outermost	The Applicant has consulted directly

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
	than 1km from the site be scoped out of the EIA. The proposed turbines are within the Very Large Turbine category and the assessment will therefore have to consider effects of turbines of this scale. At such a height they are liable to have a widespread visibility within 10km of the site. A potentially wide effect on historic character can be anticipated. This should be assessed.		turbines, led by ZTV.	with D&GC (08 July) and provided an alternative assessment methodology, including a 10km study area from outermost turbines. D&GC response is awaited.
D&GC	Impacts on the setting of significant historic environment assets, should be led by the ZTV, with the greatest effects likely to be experienced by sites of national (note that not all are designated), or greater significance closest to the site.	A5	The EIA will identify heritage assets for assessment through ZTV (tip and hub height). The current ZTV has been reviewed to identify assets that have potential visibility and determine a list of visualisations for consultation.	As above.
D&GC	On the information available it is advised that indirect effects on the following assets must be included in any assessment: - Designated monuments at Laggangarn Stones, Wood Cairn, Wells of the Rees and Carr-na-Gath Cairn - Undesignated nationally significant assets including Craigmoddie fermtoun (MDG2317) and Linn's Tomb (MDG2327), and nationally significant assets within the proposed footprint. - Archaeologically Sensitive Areas (D&GC Policy HE4) at East Rhins	A5	As above.	As above.
D&GC	Submitted visualisation should be completed following SNH 2017 guidelines 'Visual Representation of Wind Farms, Version 2.2	A5	Noted. The EIA will include the necessary visualisations once agreed with consultees.	N/A
D&GC	Cumulative effects will need to be considered. The Planning case officer will confirm the developments that need to be considered.	A5	Noted. Agreed list to be provided by relevant planning officers.	The Applicant to check with D&GC the list of cumulative developments at design freeze.
Historic Environment Scotland (HES)	The proposals have the potential to affect scheduled monuments located within and around the development site boundary. These include: Wood Cairn, cairn, Eldrig Fell (SM1953) a scheduled monument located within the development site boundary, as well as a number of nearby scheduled monuments.	A12	Noted, these scheduled monuments will be taken into consideration during the design process.	The Applicant has consulted directly with D&GC (08 July) and provided an alternative assessment methodology and proposed viewpoints for setting effects.

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
HES	Recommend that particular attention is given to the potential for impacts on the setting of the following: -Wood Cairn, (SM1953) -Cairn na Gath, (SM1922) -Caves of Kihern, (SM1928) -Bennan of Garvilland, (SM1955) -Laggangam stones, (PIC and SM90199) -Wells of the Rees, (SM2002)	A13	The current ZTV has been reviewed to identify assets that have potential visibility and determine a list of visualisations for consultation. The updated methodology issued to HES (08 July) includes the HES listed assets within the setting assessment.	As above.
HES	Recommend ZTV analysis is applied to identify heritage assets for assessment.	A13	Noted and undertaken.	N/A
HES	Recommend that assessment is supported by visualisations such as photomontage and wireframe views where impacts are likely to be highest.	A13	Noted.	As above
HES	Cumulative impacts resulting from this development in combination with other existing and proposed wind farm developments within the surrounding area should be carefully considered	A13	Noted. A cumulative assessment will be included within the EIA.	N/A
HES	We would recommend that this desk based assessment is reviewed against updated datasets to ensure that the archaeological baseline remains accurate.	A13	The previous desk based assessment will be reviewed and updated with the latest iteration of datasets.	N/A
HES	We would recommend that the approach/methodology is reviewed to allow for recent changes in EIA practice and the updated policy framework for managing to cultural heritage features.	A13	Assessment methodology has been revisited and HES and D&GC re-consulted.	As above
HES	Understand that it is intended to divide heritage assets into an 'inward' group and an 'Outward' group in order to assess impacts on setting... We would therefore recommend that the setting of individual heritage assets should be defined on a case-by-case basis.	A14	Assessment methodology has been revisited and HES and D&GC re-consulted.	As above
HES	Note that it is proposed to use the assessment within the 2010 Environmental Statement for the Operational Kilgallioch Wind Farm as a basis for including or excluding heritage assets for assessment. This includes excluding those heritage assets located further than 15km from the development from the assessment.	A14	Assessment methodology has been revisited and HES and D&GC re-consulted, which includes a 10km study area.	As above
HES	Disagree with the intention to exclude the Caves of Kihern, Chambered Cairn 450m SE of Dranigower Lodge (SM1928) from the assessment. Here, we would recommend that the potential for cumulative impacts on the setting of this heritage asset is explored within an EIA Report.	A14	The revised methodology recommends the inclusion of the Caves of Kihern, Chambered Cairn 450m SE of Dranigower Lodge (SM1928) in the assessment, and the EIA will include a cumulative assessment.	A revised list of setting viewpoints has been issued to HES which includes SM1928.

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
GPA	GPA agree with the proposed scope and methodology.	A56	Noted.	N/A
CVCC	No development on any part of the site should be consented without a prior assessment of the National importance of the archaeological value of the entire site and its surroundings as a unique example of a preserved medieval Scottish landscape.	A29	The D&GC Council HER provides an assessment of the significance levels that they attribute to these remains. This will be referenced and reviewed within the assessment.	N/A
CVCC	A new DBA, a thorough site walkover (at a time of year when bracken cover is absent), and a thorough site investigation are the bare minimum for the Scope of the Archaeological section of the EIA.	A29	A targeted walk-over survey has been carried out as requested by the Council Archaeologist.	
CVCC	Table 7.2 [summary of scope table] should be rejected.	A29	The scope has been revised to respond to the views expressed by the statutory consultees. The revised scope has been issued for agreement with HES and D&GC.	N/A
NLCC	The documentation relating to the Operational Kilgallioch Windfarm application indicates that there are significant numbers of cultural heritage sites within the Proposed Site area, conspicuously so in relation to the whole of the High Eldrig grazing area. A significant factor here is that most of this ground is unfortified, and most will not have been cultivated, meaning that the field archaeology will have good preservation. We are very concerned that the kind of development envisaged is being considered for this area at all.	A32	A targeted walk-over survey has been carried out as requested by the Council Archaeologist. The new HER dataset has been referred to and the assessment will take cognisance of the national/regional importance attributed to onsite cultural heritage assets.	N/A

## 12 Access, Traffic and Transportation

19. The following comments were received as part of the EIA Scoping Opinion on traffic and transport.

Table 12-1: EIA Scoping Opinion – Traffic and Transport

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
D&GC	No objections in principle.	A6	Noted.	N/A
D&GC	Expected duration of the project construction phase has not been identified.	A6	Duration of the construction phase will be stated within the EIA. Assumed to be 18 months from start to end of construction.	N/A
D&GC	Transport Scotland to be consulted with regard to any access utilising the Trunk Road	A6	Noted. Transport Scotland consulted and has provided an	

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
D&GC	network. Scoping report erroneously refers to the C22w as an "unclassified road". It is in fact a C-classified public road. The route identified also includes the U165w unclassified public road.	A6	independent scoping response. Noted. This will be updated in the EIA.	N/A
D&GC	All references to "highways" or "highways authority" should instead refer to "roads" or "roads authority" within Scotland.	A7	Noted. This will be referenced as so within the EIA.	N/A
D&GC	The road network in Dumfries and Galloway has been assessed relative to use by forestry extraction vehicles by Dumfries and Galloway Council in partnership with the Forestry Industry and this is reflected in the Agreed Routes Map. It should be noted that the C22w at this location is identified as a consultation route, whilst the U165w is identified as an excluded route.	A7	Noted.	N/A
D&GC	Routes should be reassessed in full based on the current scale of proposals, and where possible, collaborative work should be taken with other wind farms utilising similar routes.	A7	Noted. The transport assessment will include a cumulative assessment, based on the current understanding of wind energy developments in the area.	N/A
D&GC	The application should identify the full extent of proposed off-site road accommodation and mitigation works. All accommodation works must be designed and constructed to the satisfaction of the Planning Authority in consultation with the Roads Authority.	A7	Noted.	N/A
D&GC	The EIA should include reference to a Traffic Management Plan.	A7	Noted. This will be included within the EIA.	N/A
D&GC	EIA should include details of tonnages and vehicle movements so that the potential impact of importing aggregate from elsewhere via the public road network can be assessed.	A8	Noted. This will be included within the EIA.	N/A
D&GC	Consultation with nearby forest managers and timber hauliers through the office of the South of Scotland Timber Transport Officer should be undertaken to co-ordinate timber haulage operations that may use the access route during the construction period.	A8	Noted.	Consultation with the South of Scotland Timber Transport Officer will be undertaken as required.
Transport Scotland (TS)	TS will require to be satisfied that the size of turbines proposed can negotiate the selected route(s) and that transportation will not have any detrimental effect on structures within the trunk road route path. The Abnormal Loads Assessment report will require to identify key pinch points on the trunk road network. Swept path analysis	A72	Noted. An Abnormal Loads Assessment will be included with the application.	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
TS	should be undertaken and details provided with regard to any required changes to street furniture or structures along the route. TS satisfied that the EIA will use IEMA guidelines for assessment.	A73	Noted. IEMA guidelines will be referred to within the assessment.	N/A
TS	TS would not be prepared to accept the use of 10-year-old traffic data in the forthcoming assessment for the trunk road network, and more recent Department for Transport (DfT) or "Highways Scotland" data is considered appropriate.	A73	New traffic data will be collected.	N/A
TS	TS considers it appropriate to scope out operational effects from the EIA.	A74	Noted.	N/A
CVCC	Local residents have suffered major inconvenience from abnormal loads passing through the Cree Valley over the past decade. A new route planning methodology should be developed and employed, which should consider the needs of other road users and include meaningful consultation with all of the communities along the proposed turbine delivery route in order that a proper protocol for all future abnormal loads can be agreed and later implemented. Any fixed delivery timetable agreed must be followed by SPR.	A29	Noted. If consented and prior to construction, a Traffic Management Plan will be compiled and agreed with the relevant authorities. It will include specific mitigation measures for the delivery of abnormal loads, such as timing of deliveries and police escorts where necessary.	N/A

## 13 Socio-Economics, Recreation, Tourism and Land Use

The following comments were received as part of the EIA Scoping Opinion on socio-economics, tourism and recreation.

Table 13-1: EIA Scoping Opinion – Socio-Economics, Tourism and Recreation

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
GPA	GPA agree with the proposed scope and methodology.	A57	Noted.	N/A
Visit Scotland (VS)	The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product: a large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling wildlife watching and visiting historic sites.	A71	A tourism assessment will be undertaken by BIGGAR Economics, as part of the socio-economic assessment. It will consider the drivers of the local tourism economy, key tourism assets and available evidence on the	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
VS	Suggest that full consideration is also given to the Scottish Government's 2008 research on the impact of wind farms on tourism. <a href="http://www.scotland.gov.uk/Publications/2008/03/07113507/1">www.scotland.gov.uk/Publications/2008/03/07113507/1</a> .	A71	relationship between windfarm development and the tourism economy (including the Scottish Government's 2008 research and more recent research).	N/A
VS	An independent tourism impact assessment should be carried out and should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.	A71	N/A	N/A
Scotways	Insufficient resource to complete a full scoping response at this time.	A65	N/A	
British Horse Society (BHS)	Ensure that the developers of Kilgallioch Extension take equestrian access rights into account. Generic fact and advice sheet for both wind energy developers and equestrians. Information includes a recommendation that no turbine should be situated closer than 200m (up to 4 x tip height) from any track used, or likely to be used, by horse riders or carriage drivers, and that no associated cables should be situated any closer than 30m from an equestrian route.	A35	There are no core paths across the development area. The Southern Upland Way is located to the west/north west of the development, located within the Operational Kilgallioch Windfarm, no turbines will be sited within 200m of the Southern Upland Way. Infrastructure will be designed taking cognisance of BHS recommendations.	N/A
CVCC	If more turbines are built then the balance of perception of a visitor to the area could be tipped from that of an unspoilt scenic area with a few wind turbines, to that of a giant Windfarm with some unspoilt scenery. This change of perception is a serious risk and would have a catastrophic impact on the tourist economy in Cree Valley area. To be blunt, our market town of Newton Stewart would suffer much more than the other small villages as it contains the vast bulk of all the tourist infrastructure in the area, such as hotels and retail outlets. A wide ranging study should therefore be carried out in respect to this risk.	A29	A tourism assessment will be undertaken by BIGGAR Economics, an independent technical advisor, and will consider the drivers of the local tourism economy, key tourism assets and available evidence on the relationship between windfarm development and the tourism economy.	N/A
CVCC	SPR executives have previously informed our Cree Valley Community Council that all Community Benefit Payments are entirely voluntary and that the Scottish Government Best Practice Guidelines are not statutory and can be ignored by them whenever they choose.	A29	The socio-economic assessment will consider wider benefits, including any socio-economic benefits arising from community benefit proposals (whilst noting that community benefits are not a material consideration in a planning application).	N/A

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
CVCC	If the potential Community Benefit Package is to be included in the Socio-Economic Assessment for the Kilgallioch Windfarm Extension, then both the amount of it and the detail of how it will be awarded must be disclosed by SPR in advance of any Planning Application and must be included as a "Condition" of any Planning Approval. We would not find it acceptable for the new windfarm extension simply to be integrated into the existing fund distribution system through the Kilgallioch Community Benefit Company Ltd as we believe that serious errors and inequities occurred in the set up and organisation of this fund. We would require that a new fund is set up for the Extension, or, alternatively a completely independent Review is carried out into the distribution of the combined Existing windfarm and the Extension.	A29	Should the proposed Development be consented, the administration of Kilgallioch Windfarm Extension community benefit fund will be agreed in discussion with local stakeholders at the appropriate time. SPR will refer to the good practice presented in the guidelines ( <i>Scottish Government's Good Practice Principles for Community Benefit for Onshore Renewable Energy Developments</i> ) and, where we are able to, will take on board feedback provided by local stakeholders during these discussions.	The Applicant will engage further directly with the CVCC throughout the application process.
CVCC		A29		The Applicant will engage further directly with the CVCC throughout the application process.

## 14 Other Issues

The following comments were received as part of the EIA Scoping Opinion on other issues including aviation, radar, television and telecommunication.

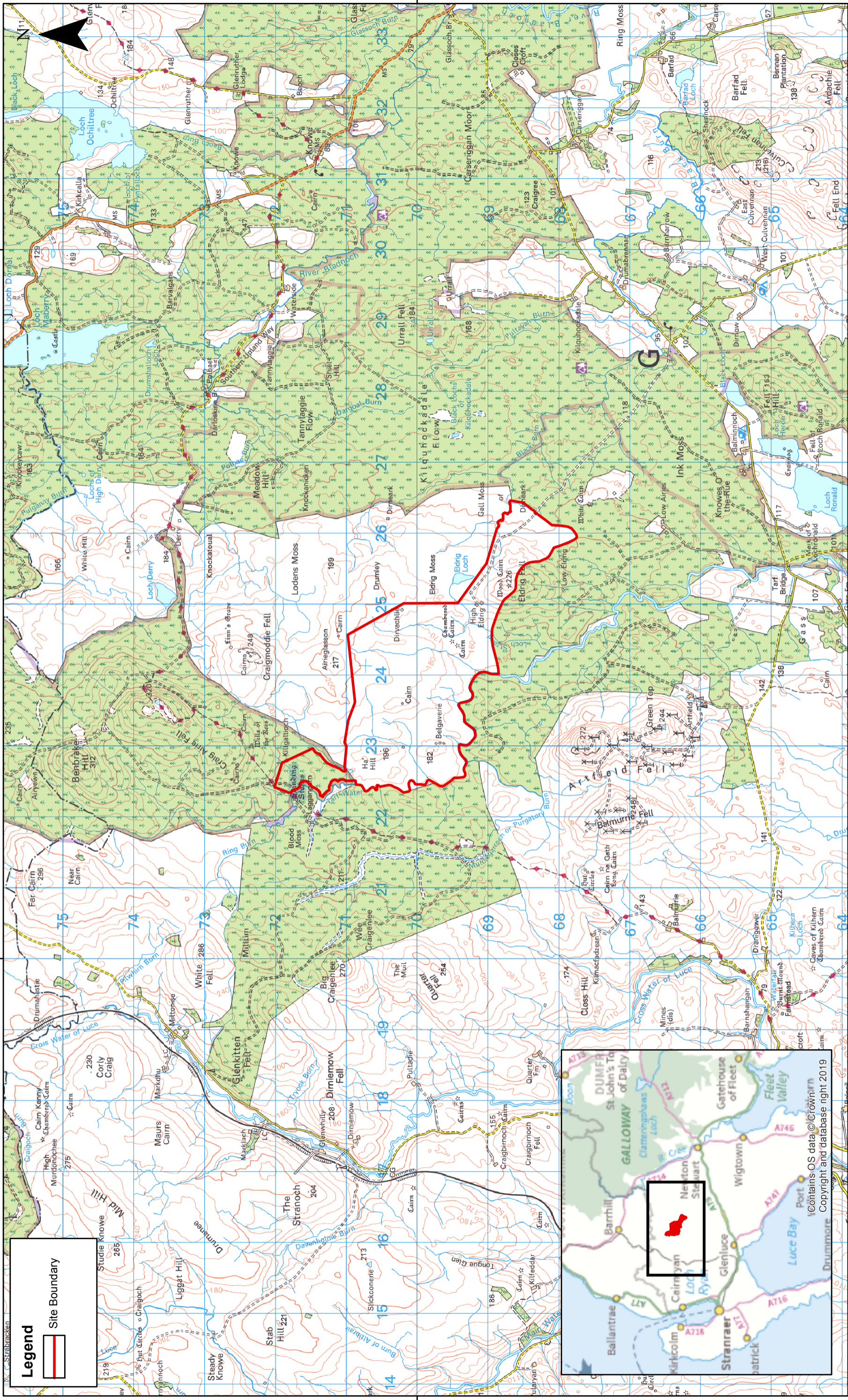
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Table 14-1: EIA Scoping Opinion – Aviation, Radar, Television and Telecommunication

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Defence Infrastructure Organisation (DIO)	The DIO has no objection to the proposal. In the interests of air safety, the DIO requests that the development is fitted with aviation safety lighting in accordance with Article 219 of the Air Navigation Order.	A47	Noted. Aviation lighting to be addressed within the EIA/R.	N/A
NATS	NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted.	A60	Noted. Any changes made to the proposed Development will be issued to NERL.	N/A

## FIGURES

Consultee	Scoping Comment	Page No.	Response to Consultee	Further EIA Consultation
Edinburgh Airport	The proposed application has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We therefore have no objection to this proposal.	A50	Noted.	N/A
Highlands and Islands Airports Limited (HIAL)	This development would not infringe the safeguarding surfaces for Campbelltown Airport, therefore have no objections to the proposal.	A58	Noted.	N/A
Glasgow Airport (GA)	This proposal is located outwith our consultation zone. As such we have no comment to make and need not be consulted further.	A54	Noted.	N/A
GPA	GPA agree with the proposed methodology and study area. With regards to cumulative assessment, GPA comment is in relation to aviation and potential cumulative radar display clutter from adjacent windfarms – which may have an impact on the ability of any radar mitigation technology effectively dealing with windfarms in close proximity to each other.	A56	A Radar Line of Sight assessment has been undertaken for the proposed Development which shows no visibility with GPA radar systems.  Evidence will be included within the EIA.	N/A
GPA	GPA responded that Glasgow Airport should be consulted to check for potential impacts.	A57	Noted. Glasgow Airport consulted as part of the scoping process, no concerns raised.	N/A
GPA	The windfarm is within the operational range of the airport's primary radar, and as such if any turbines are within line of sight of the radar, then they are likely to generate clutter on the radar displays, and as such will require to be mitigated.	A57	A Radar Line of Sight assessment has been undertaken for the proposed Development which shows no visibility with GPA radar systems.  Evidence will be included within the EIA.	N/A



Drg No	EDI_1706_EIAR
Rev	A
Date	17/07/19
Figure	1

# Kilgallioch Windfarm Extension Gatecheck 1 Report Figure 1 - Site Location Plan

1:50,000 Scale @ A3	0 1.5 3 km
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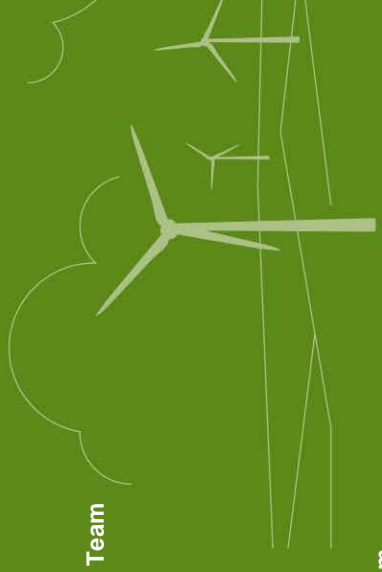
Rev	Date	By	Comment
A	17/07/2019	AH	Report

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