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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion on behalf of Scottish Ministers under the
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**WHITEMINWHILL ENERGY PARK
Votalia UK Ltd.**

15 August 2025

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ANNEX A

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Votalia UK Ltd a company incorporated under the Companies Acts with company number 07489990 and having its registered office at The Wheelhouse, Bond's Mill Estate, Stonehouse, Gloucestershire, England, GL10 3RF ("the Company") in response to a request dated 6 June 2025 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Whiteminwhill Energy Park ("the proposed development"). The request was accompanied by a scoping report.

1.2 The proposed development would be located approximately 0.9km south of Barrhill, within South Ayrshire Council planning authority. The proposed Development is centred on National Grid Reference ('NGR') NX 24104 80083.

1.3 It is anticipated that the proposed development will include:

- up to 5 wind turbines with a maximum tip height up to 230m and an installed capacity of up to approximately 50 MW
- ground-mounted solar photovoltaic (PV) with an installed capacity of up to approximately 50 MW
- up to approximately 100MW Battery Energy Storage System (BESS) and associated infrastructure

1.4 In addition to wind turbines, PV and BESS there will be ancillary infrastructure including:

- a substation compound
- a temporary construction compound formed of an area of hard standing providing space for portacabins, parking, lay down areas and potentially concrete batching
- Potentially on-site borrow pits to source aggregate for the construction of on-site access tracks, crane hardstanding areas and potentially concrete batching

All details of this infrastructure are currently not known and will be outlined in the EIA Report.

1.5 The Company indicates the proposed development would be decommissioned after 40 years and the site restored in accordance with the decommissioning and restoration plan.

1.6 The proposed development is solely within the planning authority of South Ayrshire Council. As the neighbouring authority, Dumfries and Galloway Council were also consulted.

1.7 The site was subject to an application for 8 wind turbines and associated development under the name of Altercannoch Wind Farm in 2015. Permission was refused.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between Voltaia UK Ltd. and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 27 June 2025. The consultation closed on 18 July 2025. Extensions to this deadline were granted to South Ayrshire Council (the planning authority), Dumfries & Galloway Council (neighbouring planning authority), Historic Environment Scotland, SEPA and Transport Scotland. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 36 of the Electricity Act 1989. All consultation responses received, and the standing advice from MD-SEDD, are attached in ***ANNEX A Consultation responses*** and ***ANNEX B MD-SEDD Standing Advice***.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MD-SEDD, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 The following organisations were consulted but did not provide a response:

- Civil Aviation Authority
- Crown Estate Scotland
- Ayr District Salmon Fisheries Board
- Ayrshire Rivers Trust
- Galloway and Southern Ayrshire Biosphere
- John Muir Trust
- Mountaineering Scotland
- RSPB Scotland
- Scottish Power Energy Networks
- Scotways
- Scottish Wildlife Trust
- Scottish Wild Land Group
- Stinchar District Salmon Fisheries Board
- Visit Scotland
- West of Scotland Archaeology Service
- Woodland Trust
- Scottish Fire and Rescue Service

Additionally, the following Community Councils were consulted but did not provide a response:

- Pinwherry and Pinmore
- Cree Valley
- Kirkcowan
- New Luce
- Colmonell and Lendalfoot
- Ballantrae

Barhill Community Council responded but declined to comment at this stage.

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 36 consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with South Ayrshire Council, within whose area the proposed development would be situated, NatureScot (previously “SNH”), Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 6 June 2025 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to South Ayrshire Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A and Annex B**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 The proposed development set out in the scoping report refers to wind turbines, and other technologies including battery storage and solar panels. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to:

- the scale of the development (dimensions of the wind turbines, solar panels, battery storage)
- components required for each generating station
- minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage

3.8 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.9 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided. As the regulator of private water supplies in the area, South Ayrshire Council Environmental Health request joint site visits to properties impacted by the proposal as well as maps of supplies, catchment areas and recharge zones and infrastructure.

3.10 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for onshore wind farm and overhead line development (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.11 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.12 MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.13 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), 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), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.14 The scoping report identified viewpoints at Table 5-1 to be assessed within the landscape and visual impact assessment. South Ayrshire Council have requested 5 additional viewpoints:

- Approximately 1km to the south-west of Viewpoint 1, alongside Gowlands Terrace
- An open section of the A714 between Viewpoints 4 and 6
- An open location along the A714 or within Barhill Holiday Park
- On a section of the Core Path approximately 3km to the south-west of Pinwherry and 6 km from the site
- Byne Hill summit

Additionally, Historic Environment Scotland have raised concerns on the potential impact on the setting of the designated asset Kildonan House from the proposed development.

Scottish Forestry note 'that there is expansion of native woodland species in areas out with the designated ASNW [Ancient and Semi-Native Woodland]' and suggest that there is a strong case for their retention.

3.15 The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 12 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise.". South Ayrshire Council have requested the EIA details how historic background noise data will be adjusted for wind shear due to larger turbines in the proposal.

3.16 As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 5 of the scoping report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects.

3.17 It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot. NatureScot note that breeding bird and black grouse surveys have only been conducted 100m beyond site boundaries while their advice states 500m and 1.5km for both, respectively. Additionally, they advise that the Company conduct further breeding bird surveys extending to at least 500m from Turbine T5 and further black grouse surveys in the area to the west of Turbine T5 at least up to the forest boundary. South Ayrshire Council request the EIA considers potential habitat connectivity to Feoch Burn Local Wildlife Site (LWS).

3.18 Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in '**PAN 50: Controlling the Environmental Effects of Surface Mineral Workings**'.

3.19 The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:-

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;
- underground cables;
- water pipes;
- telecommunications links.

Network Rail have additionally suggested that a Traffic Assessment should be included to assess potential impacts on their own infrastructure. Transport Scotland request the use of their National Traffic Data System in decision making and to conduct swept path analysis to inform changes in street furniture. South Ayrshire Council request mitigation of impacts of HGVs travelling the A714 is included in the EIA.

3.20 Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.

3.21 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. 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.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 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.

5.7 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

Cameron Moyes

Energy Consents Unit
15 August 2025

ANNEX A

Consultation

List of consultees who provided a response.

• South Ayrshire Council	A1-16
• Historic Environment Scotland	A17-20
• NatureScot (previously “SNH)	A21-26
• Scottish Environmental Protection Agency (SEPA)	A27-43
• Scottish Forestry	A44-46
• Transport Scotland	A47-49
• Barrhill Community Council	A50-51
• British Horse Society	A52-54
• British Telecommunications plc	A55-57
• Defence Infrastructure Organisation	A58-60
• Dumfries and Galloway Council (neighbouring authority)	A61-63
• Fisheries Management Scotland	A64-66
• Glasgow Airport	A67-68
• Glasgow Prestwick Airport	A69-70
• Health and Safety Executive	A71-77
• Joint Radio Company Limited	A78-81
• NATS Safeguarding	A82-84
• Network Rail	A85-86
• Office for Nuclear Regulation	A87-89
• Scottish Water	A90-92

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry and Marine Directorate (in the form of standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD)).

See Section 2.4 above for a list of organisations that were consulted but did not provide a response.

Planning and Building Standards

Service Lead – Planning and Building Standards: Craig Iles

Planning Service, County Buildings, Wellington Square, Ayr, KA7 1DR
Tel: 01292 616 177
Email: alastair.mcgibbon@south-ayrshire.gov.uk
Our Ref: 25/00428/EIASCO
Date: 13 August 2025



Energy Consents Unit
Cameron Moyes
Onshore Electricity, Strategy and Consents
Directorate For Energy and Climate Change
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Dear Sir/Madam,

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 – SCOPING OPINION RESPONSE

SUBMISSION REF: 25/00428/EIASCO
PROPOSAL: Request for scoping opinion for proposed section 36 application for Whiteminwhill Energy Park
SITE ADDRESS: Proposed Energy Park B7027 From Main Street Barrhill To Council Boundary At Loch Maberry Barrhill South Ayrshire

With reference to your request for an Environmental Impact Assessment: Scoping Opinion which was received on 27 June 2025, I enclose a copy of the response prepared by South Ayrshire Council (Planning Service). The supporting documents, where relevant, can be accessed from the Council's website www.south-ayrshire.gov.uk/planning/ by using the submission reference number detailed above.

This response sets out an assessment of the submission and an explanation for the conclusion(s) reached.

If you require further information in respect of your permission, please contact Alastair McGibbon by telephoning 01292 616 177 or by emailing alastair.mcgibbon@south-ayrshire.gov.uk

Yours faithfully,

REDACT

Craig Iles
Service Lead – Planning and Building Standards

Encs.



The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

Scoping Opinion of South Ayrshire Council (Planning Service) for:

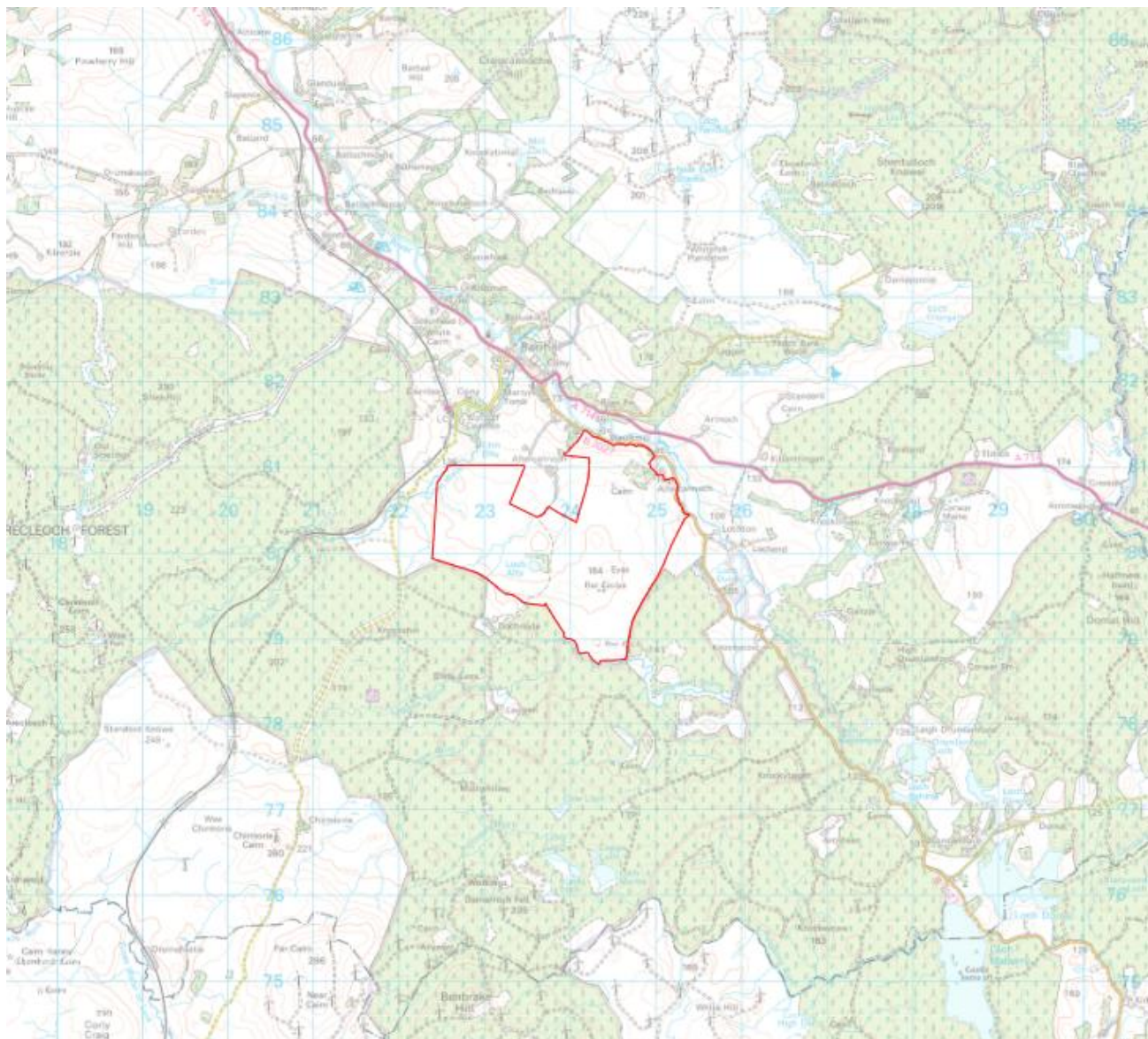
Request for scoping opinion for proposed section 36 application for Whiteminwhill Energy Park

at:

Proposed Energy Park B7027 From Main Street Barrhill to Council Boundary at Loch Maberry, Barrhill, South Ayrshire

Location Plan

APPLICATION SITE



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1. Introduction

South Ayrshire Council received a request under Regulation 17 of The Town and Country Planning (Environmental Impacts Assessment) (Scotland) Regulations 2017 ('The Regulations') for a scoping opinion on 27 June 2025. The purpose of this scoping opinion is to provide the applicant with details of what the Council considers to be the main issues and therefore the issues upon which the EIA Report should focus.

As part of the process of preparing this scoping opinion the Council has consulted with a wide range of agencies (both statutory and non-statutory). Each of the consultees has provided a response relating to their own particular remit and are outlined within the relevant section of this response.

2. Description of the Development

This Scoping Opinion relates to a proposal for construction of up to 5 wind turbines with a maximum tip height of up to 230m and a generating capacity of up to approximately 50MW, ground-mounted solar photovoltaic (PV) with a generating capacity of up to approximately 50MW and up to approximately 100MW Battery Energy Storage System (BESS) and associated infrastructure.

3. Description of the Location

The proposed development would be constructed and operated on land approximately 0.9km south of the settlement of Barrhill. The proposed development is centred on National Grid Reference NX 24104 80083, with the site area extending to approximately 440 hectares. The topography of the site slopes from the southwest at approximately 160m above ordnance datum (AOD) down to the northeast at approximately 78m AOD. The highest point of the site is in the south at approximately 165m AOD.

4. Planning Policy Context

In developing the proposal and preparing the environmental statement, particular regard should be afforded to the relevant provisions of National Planning Framework 4 and the South Ayrshire Local Development Plan 2. The Council guidance documents "Supplementary Guidance Wind Energy", "Supplementary Guidance Dark Sky Lighting" and "South Ayrshire Wind Capacity Study Update 2018" provide informal guidance on the Council's interpretation of the LDP policies relating to wind energy.

The following policies are relevant in the assessment of any future application:-

NPF4

Policy 1 (Climate and nature crises), Policy 2 (Climate adaptation and mitigation), Policy 3 (Biodiversity), Policy 4 (Natural places), Policy 5 (Soils), Policy 6 (Forestry, woodland and trees), Policy 7 (Historic assets & places), Policy 11 (Energy), Policy 18 (Infrastructure first) and Policy 22 (Flood risk and water management).

South Ayrshire Local Development Plan 2

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Management
LDP Policy: Delivering infrastructure
LDP Policy: Galloway & Southern Ayrshire Biosphere
LDP Policy: Landscape quality
LDP Policy: Woodland and forestry
LDP Policy: Green networks
LDP Policy: Water environment
LDP Policy: Flood and development
LDP Policy: Air, noise and light pollution
LDP Policy: Renewable energy
LDP Policy: Wind energy

LDP Policy: Historic environment
LDP Policy: Natural heritage
LDP Policy: Land use and transport
LDP Policy: Outdoor public access and core paths

The provisions of NPF4 and the Adopted South Ayrshire Local Plan must be read and applied as a whole, and as such, no single policy should be read in isolation.

Other Policy Documents

In addition to the statutory development plan, the following related policy documents are considered relevant:-

South Ayrshire Council Wind Energy Guidance 2015
South Ayrshire Landscape Wind Capacity Study Update 2018
Scottish Government Onshore Wind Policy Statement 2022
Scottish Government Biodiversity Draft Planning Guidance November 2023
Nature Scotland Guidance on Advising on Peatland, Carbon Rich Soils and Priority Peatland Habitats in Development Management November 2023

5. Consideration of Alternatives

Schedule 4, paragraph 2 of the Town and Country Planning Environmental Impact Assessment (Scotland) Regulations 2017 requires that all environmental statements should include information on the main alternatives studied and an indication of the main reasons for choosing the selected option, with reference to the environmental effects. The applicant should include details of the iterations of the development considered together with a comparison of the net environmental impacts between each iteration and an explanation of the reasons for the rejection of earlier designs and for selection of the proposed design.

6. Statutory Consultee Responses

This response is provided on the assumption that Energy Consents Unit have undertaken all statutory consultations. The responses of the statutory consultees should be fully considered in the finalisation of the development design and the EIA Report.

The responses from South Ayrshire Council's internal consultees are referenced in the relevant sections of this response. The following were consulted by the Council.

Douglas Harman Landscape Planning
ACCON UK Limited (Council's Operational Noise Consultant)
AECOM (Council's Ecological Consultant)
Ayrshire Roads Alliance
Council's Environmental Health Service

7. Proposed Scope

1 Landscape and Visual Impact

These comments on the proposed scope of a Landscape and Visual Impact Assessment (LVIA), as set out in the applicant's Environmental Impact Assessment Scoping Report (May 2025), are provided by Douglas Harman Landscape Planning, on behalf of South Ayrshire Council. The Landscape and Visual chapter of the Scoping Report, sets out details of the proposed scope LVIA, presented under the following main headings:

- proposed assessment methodology;
- baseline conditions and key sensitivities;
- potential impacts and effects;
- mitigation; and

- proposed scope of EIA chapter.

The Landscape and Visual Chapter is also supported by the following figures:

- Figure 5.1: Bareground Zone of Theoretical View (ZTV); and
- Figure 5.2: ZTV.

As a general overview, the information provided by applicant is considered sufficient in detail and scope to respond to the following consultation questions, as raised within the Scoping Report:

- Q5.1: *Do consultees agree with the proposed LVIA study area? If not, which receptors are omitted that should be included, and why should they be included?*
- Q5.2: *Do consultees agree with the proposed viewpoint locations and visualisations? If not, please detail (with reasons) which viewpoints should be:*
 - Moved;
 - Added; or
 - have different or additional visualisation types provided.
- Q5.3: *Do consultees agree that Wild Land Assessment can be scoped out? If not, please set out the basis for its inclusion?*
- Q5.4: *Do consultees agree with the proposed RVAA study area? If not, which homes are omitted that should be included and why should they be included?*
- Q5.5: *Do consultees agree with the omission of groups of fewer than 3 turbines and turbines of under 50m from the cumulative assessment? If not, which of these smaller groups/ smaller turbines do they consider should be included and why?*

Q5.1: Do consultees agree with the proposed LVIA study area? If not, which receptors are omitted that should be included, and why should they be included?

Paragraph 5.4.1.3 of the Scoping Report states:

“Taking account of the likely effects arising from turbines of the height proposed, the receptors described above, existing and operational wind farms and the extent of visibility illustrated by Figure 5.1 and Figure 5.2, it is considered that potentially significant effects on landscape and visual receptors would be likely to arise as follows:

- *Within approximately 10-12km to the northwest, beyond which visibility notably reduces, and there is a closer group of operational wind farms.*
- *Within approximately 3km to the north and northeast due to extensive forestry and the presence of Mark Hill wind farm.*
- *Within 2km to the south and west, due to the presence of existing and consented wind farms and forestry.*
- *Within 10km to the southeast beyond which visibility notably reduces.*
- *Within approximately 19km to the east, beyond which visibility notably reduces.”*

Based on the above prediction of potentially significant effects, the applicant proposes a 20km study area.

Response

I agree with the applicant's initial prediction on the likely extent of potentially significant effects. However, it is advised that an initial 45 km radial study area should be adopted as a starting point (e.g. ZTV and receptor mapping), as recommended in *Visual Representation of Wind Farms Guidance* (SNH, 2017).

Given the very large size of the proposed turbines (up to 230m l height), it is suggested that a focused **25km** study area would then be more appropriate, as this would provide a check that effects on any sensitive receptors beyond 20km, are not likely to be significant. As we have no or very little understanding of how

prominent 230m turbines could appear in the landscape, a focused 25km study area is therefore considered to be a reasonable one.

Q5.2 Do consultees agree with the proposed viewpoint locations and visualisations?

Table 5.1 within the Scoping Report identifies the following proposed viewpoints:

No.	Location	Distance & direction	Visualisation types	Key Receptors
1	Local road near Barrhill Station	0.9km, NW		Residents, local road and railway users
2	Barrhill - Gowlands Terrace	1.9km, N	Night	Residents, Stinchar Valley LLA
3	Barrhill - Main street	1.8km, NW		Residents
4	A714 southeast of Barrhill	1.6km, N	Night	Residents, road users
5	B7027 south of Barrhill	1.4km, N		Residents, road users
6	A714 near Killantringan Cottage	1.9km, NE		Residents, road users
7	B7027 near Lochton Mill	0.9km, E		Residents, road users
8	Local road north of Chirmorie Farm	3.7km, SE		Local road users
9	Hill of Ochiltree	9.5km, SE		Users of Southern Upland Way
10	Larg Hill (Lamachan Hill)	17.6km, E	Cumulative wireline	Larg Hill (Lamachan Hill)
11	The Merrick	18.8km, NE	Cumulative wireline	The Merrick
12	A714 north of Barrhill	4.9km, NW		Road users, dispersed settlement,
13	Pinwherry	6.8km, NW	Night	Residents, local road users
14	Clauchanton Hill	10.4km, NW		Core Path users, Stinchar Valley LLA

With regard to the proposed viewpoints, the Scoping Report notes “*Except where indicated otherwise, the three main NatureScot visualisation types (baseline panorama with cumulative wireline, wireline showing aviation lights and day-time photomontage) will be prepared for each viewpoint during the daytime. For viewpoints marked as ‘Night’, additional visualisations will be prepared showing the baseline view at night and a night-time photomontage. In addition to the turbines, other infrastructure, including the substation, tracks, solar panels, and BESS, will be shown on photomontages where visible within 5km. Wirelines only are proposed for more distant hill summits.*”

Response

Given that a focused 25km study area is recommended, the applicant should explore other suitable viewpoints beyond 20km. However, as the applicant has only provided a basemap ZTV out to 20km to the north, it is not possible at this stage to identify any indicative locations within South Ayrshire.

With regard to the proposed 14 viewpoints within 20km, these are not considered adequate in number or coverage to provide a representative understanding of all likely significant effects. In addition to those proposed, it is advised that the LVIA should also provide detailed landscape, visual and cumulative assessments from the following locations:

- Approximately 1km to the south-west of vp 1, alongside Gowlands Terrace – this section of the local road is located on higher ground than vp 1, with open views of the nearby site. In addition to road users, it would also represent views from the nearby rail line.
- An open section of the A714 between vp 4 and 6 – this would provide views of how the nearest northerly turbine appears above the nearby lower-lying valley.
- An open location along the A714 or within Barhill Holiday Park – this would provide a view approximately at the midway point between vp 3 (1.8km) and vp 12 (4.9km).
- On a section of the Core Path approximately 3km to the south-west of Pinwherry and 6 km from the site – this recreational route is subject to relatively extensive theoretical visibility.
- Byne Hill summit - an important and frequently visited Scenic Viewpoint near to Girvan.

In addition to the above, the applicant should also consider the inclusion of additional viewpoints for any informal walking routes and visitor attractions within approximately 5 km from the site, particularly any circular routes that link to nearby settlements, as well as any accessible forestry tracks used for recreational purposes.

With regard to the proposed night time visualisations, as the site and surrounding landscape is largely unlit and that part of the Galloway Dark Sky Park is partly located within the study area, it is advised that night time visualisations should be provided for all viewpoints within 10 km from the site. Lighting effects should also be assessed from all representative viewpoints, and not just from the viewpoints selected to illustrate night-time effects.

As for the production of cumulative wirelines and visualisations of all planned, consented and operational windfarms, and larger single turbines, these should include all relevant cumulative developments within a 360° view.

Q5.3: Do consultees agree that Wild Land Assessment can be scoped out? If not, please set out the basis for its inclusion?

Response

As the Wild Land Area is located within Dumfries and Galloway, its potential exclusion should be agreed with NatureScot and Dumfries and Galloway Council.

Q5.4: Do consultees agree with the proposed RVAA study area? If not, which homes are omitted that should be included and why should they be included?

The Scoping Report proposes that the RVAA study area is set at 2km, but to avoid a two-tier approach to homes in Barrhill, it should extend beyond this distance to include all of the core part of the village.

Response

The proposed study area is agreed with.

Q5.5: Do consultees agree with the omission of groups of fewer than 3 turbines and turbines of under 50m from the cumulative assessment? If not, which of these smaller groups/ smaller turbines do they consider should be included and why?

Response

The omission of groups of fewer than 3 turbines and turbines of under 50m from the cumulative assessment is agreed with.

Other points

In addition to the guidance documents identified within the Scoping Report, the applicant should also consider:

- *General pre-application and scoping advice for onshore wind farms. Guidance.* NatureScot 2024; and
- *Assessing the Cumulative Impact of Onshore Wind Energy Developments.* NatureScot 2021.

In assessing wider visual effects, the LVIA should provide detail sequential assessments of all main road, rail and important recreational routes within 25 km, as well as main settlements and visitor attractions.

In addition to a detailed assessment of the effects on Local Landscape Areas, it is also essential that the EIA considers effects on the landscape setting of any Scheduled Monuments, Conservation Areas, Listed Buildings and registered Battlefields within at least a 5 km radius.

Given the proximity of nearby forestry, detailed consideration should be given to the landscape and visual effects of any felling and restocking proposals (both adverse and beneficial) and any mitigation and landscape enhancement should be optimised in the design of any Wind Farm Forest Plan and/or compensatory planting. Any proposed forest felling areas should also be shown in relevant visualisations from nearby LVIA viewpoints.

While the character of a landscape is not readily discernible during hours of darkness, lighting can affect perceptual qualities associated with landscape character and it is recommended that the effect on the sense of seclusion and naturalness (due to existing low lighting levels) are also considered in the LVIA.

The applicant is advised to keep the cumulative situation under review during the preparation of the EIA Report as this is an evolving situation. As such, it is suggested that they make contact with any local authorities within the study area to obtain up to date information relating to wind energy development in their respective authority areas.

In assessing cumulative effects, the applicant should also give consideration to potential effects with other tall structures such as electricity pylons and any nearby telecommunication masts which could contribute to cumulative landscape and visual impacts. Furthermore, the cumulative assessment should include a cumulative night-time assessment taking into account other wind farms / turbines which have / will require visible aviation lighting and any other tall structures which have visible aviation lighting on them.

2. Cultural Heritage and Archaeology

The proposed scope and methodology for the assessment of impacts on cultural heritage are noted. The Council advise that Scoping comments on this area would be provided by the appropriate body, that is, Historic Environment Scotland.

3. Ornithology

The Council has no comment to make on ornithology, the acceptability or otherwise of the proposed content within the EIA is a matter for NatureScot to comment upon.

4. Ecology and Nature Conservation

Cross Water provisional Local Wildlife Site (pLWS) is located partially within the Proposed Development boundary and Feoch Burn pLWS is located 0.1 km north-east of the Proposed Development. UKHab and NVC survey have been carried out within the Proposed Development boundary only. We would suggest NVC survey within 250 m of any excavations greater than 1 m depth where there is potential

for Ground Water Dependent Terrestrial Ecosystems (GWDTEs) or Annex 1/Scottish Biodiversity List habitats. If there will be any excavations within 250 m of any pLWS, the applicant may need to consider further survey of such areas.

Uncommon and rare butterflies are listed as a feature of interest of Feoch Burn pLWS. There has been no consideration of potential impacts on protected and important invertebrates. In relation to Feoch Burn pLWS, the applicant may need to consider whether there is any potential habitat connectivity between the pLWS and the Proposed Development site to determine if any impacts are likely.

5. Geology and Peat

The Council has no comment to make.

6. Water Resources and Flood Risk

The Ayrshire Roads Alliance, as the Council's Flooding Authority were consulted on the Scoping Report and provided the following response to the scoping questions.

Q10.1: Are consultees content with the proposed methodology and scope of the assessment of water resources and flood risk? **ARA Flooding Yes. Environmental Health No.** Please see comments from Environmental Health colleague below.

Q10.2: Can Scottish Water confirm if there are any drinking water protected areas and / or Scottish Water assets within the Study Area. **N/A**

Q10.3: Can SEPA and / or South Ayrshire Council provide any information on known flooding within the Study Area, and do you agree with the approach to flood risk? **ARA/South Ayrshire Council have no record of flooding within the study area.**

Q10.4: Does the Council, NatureScot, SEPA or other consultees have any information that would be useful in the preparation of the water resources and flood risk chapter assessment? **The SEPA Flood Maps show property flood risk within the village of Barrhill from the Cross Water. There is anecdotal evidence that property flooding has previously occurred in the village of Barrhill because of the Cross Water. This being the case, the importance of the proposed development not increasing the catchment runoff characteristics of the Cross Water cannot be overstressed. Furthermore, and if possible, the development should look to development proposals which create, expand, or enhance opportunities for natural flood risk management as a community benefit. Please also see comments below.**

The Councils' Environmental Health Service were also consulted in respect of PWS and commented as follows.

On reading through it is also apparent the applicant refers several times to the previous Altercannoch Wind Farm application to evidence their own requirements for the application, except for private water supplies, of which there is no mention of South Ayrshire Council being the regulator for the PWS or reference to the legislation at all. There is reference to SEPA, and groundwaters; however, South Ayrshire Council Environmental Health are the regulators for the private water supplies within the area, and as such require consultation.

There are a high number of private water supplies both within and just outside the boundary proposed, with some of them using catchments and their supply systems infrastructure which would be directly and seriously affected through construction of both the wind turbine farm and the solar energy park.

The blue hatched area for the proposed energy solar farm has potential to directly and seriously impact several of the catchments/recharge zones and supply systems infrastructure for private water supply systems as well.

We require much more information on the private water supplies in relation to the proposals. Joint site visits are required to risk impact assess the potential for damage to water quality/quantity for the future.

There is no indication at this point of the external access road into the site, which in turn may then have the potential for serious impact on private water supplies out with the boundary of the energy park itself.

There is no reference to access roads, borrow pit sites, compound sites, laydown area sites etc.

I have serious concerns over the requirement for 150m micro siting ability, within such a vulnerable small area close to private water supplies where there is no mains connection.

The very close proximity of the siting of some of the infrastructure to regulated properties and businesses gives serious concern for future quality/quantity.

We require maps for the private water supplies, their infrastructure, their catchments/recharge zones. Maps overlayed as well, with the proposed wind farm and energy park showing the potential for impact on the private water supply systems from catchment to end users. We would require these from the joint visits in person to each of the properties, and not generated from desk top studies.

The areas are high drought areas in certain weather or climate events, such as this year, as in previous years, the worst year to date being 2021 when most of the private water supplies in the Barrhill area were without their supply for several months.

Forestry will have to be considered, due to felling/replant and machinery involved.

A lot more information and mapping proof is required to enable any future decision.

As such I would object to any application based on the grounds of what has been submitted already and would ask that a meeting could be set up with yourself, myself and the applicant to discuss requirements.

7. Access, Traffic and Transport

The Ayrshire Roads Alliance have been consulted on the Scoping Report and commented as follows.

Q11.1: Are consultees content with the proposed methodology and scope of the traffic and transport assessment?

Yes, the ARA are satisfied that the methodology represents industry standard practices and that the scope is generally appropriate.

Q11.2: Are the council / statutory consultees aware of any specific access restrictions or limitations on the proposed abnormal loads route?

Whilst there are no formal restrictions, the ARA have concerns around the impact of HGV movements on the A714 and expect this to be considered and mitigated as appropriate within the EIA.

Q11.3: Are consultees content to scope out operational traffic from further assessment?

Yes, given the nature of the operational phase of the development we consider that operational traffic is likely to be negligible.

Q11.4: Are you aware of any relevant policies or guidance documents not specifically mentioned in Appendix B of the Report?

ARA don't set policies governing development within SAC; however, we do expect any and all infrastructure to be designed in accordance with the standards as set out within the SCOTS National Roads Development Guide.

It is noted that at this juncture many of the key details including port of entry, AIL routes, construction traffic estimates, borrow pit viability, etc are unconfirmed. As such, there is limited further comment we are able to offer at this early stage.

We would however place emphasis on early confirmation of borrow pit viability in order to provide comfort on likely construction trips, and associated impacts on the A714 and C72. Whilst worst-case estimates based on high proportions of imported material may provide robust estimates for the purpose of ensuring a comprehensive review, it in turn heightens our concerns with respect to the impacts on nearby communities and adopted road infrastructure.

8. Noise

The Scoping Report refers to ETSU-R-97 and the IOA Good Practice Guide (IOA GPG) as the relevant guidance documents for assessing operational noise from the wind farm. We would expect the noise chapter of the EIAR to also consider the 'Wind Turbine Development: Submission Guidance Note' (SGN) issued by South Ayrshire Council Environmental Health. The relevant British Standards that should be used to consider construction noise and vibration are referenced (BS 5228 Parts 1 and 2). The Scoping Report appropriately indicates that BS 4142 provides the relevant methodology for assessing noise from the proposed BESS, solar farm and substation.

Key Sensitivities and Study Area

The Council are content with the approach proposed to assess operational noise from the proposed wind turbines. The approach outlined to assessing cumulative wind turbine noise reflects good practice and the key operational and consented developments to be included in the assessment are listed.

It is stated that noise sensitive properties within 1 km of the proposed BESS, solar farm and substation will be assessed in accordance with BS 4142.

Baseline Conditions

It is proposed to utilise historical baseline (background) noise measurement data from fourteen locations obtained from surveys carried out for the previously proposed Altercannoch wind farm and the consented Arecleoch Extension wind farm. Additionally, new background noise data will be collected from a survey at three properties near the development site.

The Council recommend that the measurement locations for the new survey should be discussed with ACCON as the main advisors to SAC on wind farm noise, rather than the Environmental Health Department.

Potential Impacts

The Scoping Report states that construction noise will be assessed in accordance with BS 5228-1 and any potential blasting will be considered with regards to air overpressure and vibration, if necessary, assessing vibration with respect to BS 6472-2. The applicants should note that Scottish planning guidance in the form of Annex D to Planning Advice Note 50 provides advice on acceptable levels of vibration and air overpressure for blasting. The potential impact of construction traffic will be assessed using methodology from BS 5228-1 and 'Calculation of Road Traffic Noise' where appropriate.

Paragraph 12.3.2.4 states that the implication of wind shear effects due to the differences in turbine heights between historical data and the proposed turbines would be considered in line with best practice. ACCON consider more detail of the proposed methodology to be used should be provided, as discussed further in our response to Q12.2.

Scoping Questions

Q12.1: Are the consultees happy with the suggested approach for the noise assessment, including elements scoped in and out?

South Ayrshire Council agree in general with the proposed approach to the noise assessment, although our response to Q12.2 should be noted. We are content with elements scoped in and out of the assessment.

Q12.2: Do the consultees have any objection to referencing previous publicly available historical background noise data acquired around the Site?

We note that the background noise data obtained for Altercannoch and Arecleoch Extension wind farms was standardised to 10 m height based on wind speeds measured at between 70 m and 81 m heights. The recommendation in the IOA Good Practice Guide is that background noise levels should be standardised using wind speeds obtained at a height '*not less than 60% of the hub height of the proposed turbine*'. As this provision will not be met for the proposed turbines, the applicant's acoustic consultants are requested to provide details of the approach they propose to use to adjust the historical background noise data for wind shear before South Ayrshire Council agree to the use of this data in place of carrying out noise new noise measurements.

9. Climate Change and GHG Assessment

The Council have no comment to make.

10. Socio-economics, Land Use, Tourism and Recreation

The Council is content with the proposed methodology, scope and study areas outlined.

11. Telecommunications and Utilities

The Council agree that Telecommunications and/ or utilities can be scoped out of the EIA. This matter should be considered within a separate Planning Statement.

12. Aviation Impacts

The Council agree that aviation matters should be scoped in the EIA. The effects of the development on aviation safety are not environmental impacts in themselves. However, the lighting required for air navigation will impact on the night-time landscape and visual impact and should be scoped in.

13. Shadow Flicker

It is not agreed that only residential properties within 10 rotor diameters of the individual turbines should be examined for potential shadow flicker effects. All properties that are within a reasonable distance and would have direct line of sight of any of the proposed turbines should be assessed. Without prejudice to the outcome of any assessment, it should be noted that the Planning Authority are likely to recommend a condition which requires submission of a protocol for resolving any unanticipated complaints received regarding shadow flicker after the wind farm is operational.

14. Glint and Glare

A Glint and Glare Assessment Report should be submitted in support of any application.

15. Forestry

Final guidance on this topic should be provided by Scottish Forestry; however, the Council consider that this should be scoped in given the stated potential loss of ancient woodland.

16. Human Health

Content is noted.

17. Major Accidents and Disasters

The EIA should consider the possibility of major accidents occurring and the implications for human health and the environment. The risk of a peat slide and impact on PWS should be assessed in this context.

8. Conclusion

The Scoping Report generally provides a good level of detail. Key comments from the Council relate to landscape and visual impact, operational noise, traffic/transportation and impact on PWS.

9. Other Supporting Information Required

The EIAR should be concise and focussed on environmental issues. The applicant's assessment of the proposal against Development Plan Policy and the balance with other material planning considerations should be provided within the separate Supporting Statement.



By email to: Econsents_Admin@gov.scot

Cameron Moyes
Case and Systems Officer
Energy Consents Unit

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300081006
Your ref: ECU00006199

31 July 2025

Dear Cameron Moyes

**The Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**
Whiteminwhill Energy Park, Knarie Farm, South Ayrshire
Comments on scope of proposed Environmental Impact Assessment

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 27 June 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

South Ayrshire Council's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed development

We understand that the proposed development comprises an array of five turbines with a maximum tip height of 230m, plus a solar array between the turbines, a c.100MW battery energy storage system, and associated infrastructure.

Scope of assessment

We have identified potential for significant effects on our historic environment interests. Our advice on the nature of these impacts, and any potential mitigation measures, is included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#). The guidance on [Setting](#) is particularly relevant in this case.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



We also recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Deirdre Cameron at Deirdre.Cameron@hes.scot.

Yours sincerely

Historic Environment Scotland



ANNEX: Our Detailed Comments

Background

We understand that the proposed development comprises an array of five turbines with a maximum tip height of 230m, plus a solar array between the turbines, a c.100MW battery energy storage system, and associated infrastructure. The application area is located to the south of Barrhill, close to the border between South Ayrshire and Dumfries and Galloway.

Part of the current application area was included in a previous proposal for Altercannoch Wind Farm. This application was refused at appeal on grounds of impacts on landscape and residential amenity. We note that this decision was reached under planning policies which have been superseded by NPF4. We did not object to the application but we did note potential for impacts on designated assets on a proposed access route.

Scoping Report

We are generally content with the proposals for the assessment of cultural heritage interests laid out in the scoping report but would wish to highlight the following issues –

- Sieving exercise - section 6.5.1.3 of the report proposes scoping out assets which are not within the bare earth ZTV. Although rare, it is possible for an asset with no direct intervisibility of a development to experience an impact on its setting resulting from the impact on views towards the asset. We would wish to see professional judgement applied to the consideration of all designated assets within the study areas, not just those within the ZTV.
- Assessment of significance of impact and effect – the scoping report does not provide a detailed methodology for how the significance of impacts and effects will be assessed. We note and welcome the commitment in section 6.5.1.1. of the report to follow the guidance provided in the Environmental Impact Assessment Handbook which offers specific advice on this matter.

Our interest

Based on the preliminary information available, we have identified potential for significant impacts on the setting of the following designated asset -

Kildonan House (LB1052)

This category A listed building is a large early 20th century U-plan country house designed in the English Manorial Revival Style.

The entrance court of the house in the south-east faces out onto an expanse of open landscape directly in line with the proposed turbines. This is an important elevation in terms of the appreciation, understanding, and experience of the house, and its setting. We recommend that the potential impacts of the development in this key view from the house should be assessed in the EIAR and mitigated if necessary.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



We consider visualisations will be required to aid in the assessment of this issue and we would be happy to identify relevant locations for viewpoints if that would be helpful.

Our position

The proposed development has the potential to result in significant adverse effects on a designated cultural heritage asset. This should be assessed and any mitigation necessary put in place before the application is submitted.

Historic Environment Scotland
31 July 2025

Katie Butchart

From: informed@planning.nature.scot
Sent: 21 July 2025 11:14
To: Cameron Moyes
Cc: Hannah.Linton@nature.scot
Subject: Whiteminwhill Energy Park - ECU00006199 - EIA Scoping - NatureScot response

Dear Mr Moyes,

Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Request for Scoping Opinion for Proposed Section 36 Application for Whiteminwhill Energy Park (ECU00006199)

Thank you for consulting us on the scope of the Environmental Impact Assessment (EIA) for the proposed Whiteminwhill Energy Park. The following advice is based on the contents of the *Whiteminwhill Energy Park: EIA Scoping Report* (Environmental Resources Management Ltd, June 2025), and associated appendices.

We have also responded to the applicant's specific consultee questions found in the Scoping Report which are relevant to NatureScot, and our questions can be found in the Appendix of this advice.

1.1. Background

1.2. The proposed development is located 0.9km south of Barrhill, South Ayrshire and comprises:

- 5 wind turbines with a maximum tip height of 230m and a capacity of 50 MW,
- A solar photovoltaic park with 50 MW capacity, and
- A 100 MW capacity Battery Energy Storage System (BESS).

1.3. We provided pre-application advice to the applicant's ecologists, Natural Power, on 12 October 2021. At that stage, the proposal comprised only of a solar farm with 220 MW capacity. As such, our advice at that stage did not take into account the 5 turbines and BESS which are now part of the application.

1.4. We also provided some further advice to Natural Power in an email dated 11 February 2025, where it was stated that "we would expect, that in any subsequent ecological report, the position you may take that differs from our published guidance is clearly explained and justified".

Where relevant we refer to our pre-application advice below.

2. General Scoping Advice

2.1. The applicant should refer to [our pre-application guidance for onshore wind farms](#), and [our new pre-application guidance for solar farms](#). These documents provide our standing advice on the issues that developers and their consultants should consider for these forms of development. They include our advice on recommended survey methods, sources of further information and guidance, data presentation and our expectations for the contents of EIA Reports. Attention should be given to the full range of advice included in the guidance notes. These documents will be updated regularly and applicants should therefore ensure that they refer to the most recently published versions.

3. Specific Scoping Advice

Protected Areas

-

3.1. We are in agreement with the decision to scope out the Glen App and Galloway Moors Special Protection Area (SPA), due to the site being outside the core foraging range for the sites qualifying feature, hen harrier, and there having been none recorded during breeding season or roost surveys.

3.2. We agree with the proposal to scope in effects on Ailsa Craig SPA/Site of Special Scientific Interest (SSSI) due to there being a likely significant effect on both lesser black-backed gulls, and herring gulls. Information on both Ailsa Craig SPA and SSSI is available on our [SiteLink page of our website](#).

3.3. The status of the SPA means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the “Habitats Regulations”) or, for reserved matters, The Conservation of Habitats and Species Regulations 2017 apply. Consequently, Scottish Ministers will be required to consider the effect of the proposal on the SPA before it can be consented (commonly known as Habitats Regulations Appraisal). [Advice on this process is available on our website.](#)

3.4. We are aware that the applicant intends to submit a shadow Habitats Regulations Appraisal (HRA) as part of the EIA Report. As part of this shadow HRA, the following information is required as part of the EIA Report:

- An assessment of potential collision risk for lesser black-backed and herring gulls and how this may affect the viability of the relevant species’ SPA population. Maps showing flight lines of these species recorded during vantage point watches should be included with the EIA Report.

3.5. We are also in agreement with the decision to scope in effects on the Feoch Meadows SSSI. We welcome the proposal to include a Peatland Condition Assessment to assess potential hydro-connectivity with the site. [More information on this SSSI is available on SiteLink.](#)

Birds in the Wider Countryside

-

3.6. We note that the applicant has cited [our guidance on recommended bird survey methods for onshore wind farms](#). However, this guidance advises that breeding bird surveys should extend to 500m beyond the site boundary, and surveys for black grouse should be done on suitable habitat up to 1.5km beyond the site boundary. We note that both the breeding bird and black grouse surveys conducted so far have only extended to 100m beyond the site boundary. A justification for this decision is not apparent in the Scoping Report, as was advised in our email to the applicant’s ecologist, dated 11 February 2025.

3.7. While we accept that a buffer of 500m was present for these surveys around *most* of the proposed turbines, we are particularly concerned by the lack of surveying to the west of Turbine T5. This area could potentially provide suitable habitat for wading birds and black grouse. Therefore, **we advise that the applicant should conduct further breeding bird surveys extending to at least 500m from Turbine T5. We also advise that the applicant conducts further black grouse surveys in the area to the west of Turbine T5 at least up to the forest boundary.**

Protected Species

-

3.8. We agree with the species which have been scoped in and out of the Scoping Report. We are pleased to see that pre-construction ecology walkover surveys will be carried out a maximum of eight months prior to work commencement, and any subsequent refinement and mitigation plans produced as a result of those surveys. For further guidance on protected species, the applicant should refer to [our standing advice on our website](#).

3.9. We welcome the intended 30m buffer around watercourses to mitigate potential impacts on water vole, and a 200m buffer from infrastructure around habitat suitable for sheltering otter.

Deer

3.10. In our pre-application advice, dated 12 October 2021, we recommended that the impact on deer should be assessed, in particular due to the proposal for a deer fence on site. However, we note that impacts on deer have not been referred to within the Scoping Report. The applicant should refer to the advice given in our pre-application guidance referred to above.

Carbon-Rich Soils, Peatland And Priority Habitat

-

3.11. It appears that there is extensive blanket bog habitat within the proposed development site. The applicant should refer to our [standing advice on peatland, carbon-rich soils and priority peatland habitats](#) for detailed advice on the level of survey information which should be provided with the EIA report and for advice on compliance with the mitigation hierarchy. We request that the template in Annex 2 of the guidance is completed and included with the EIA report, as this will assist us in our consideration of whether any impacts on peatland habitat raise issues of national interest.

Concluding Remarks

Our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is subsequently submitted as a formal application.

This advice is provided by NatureScot, the operating name of Scottish Natural Heritage. We hope that you will find it helpful in developing your proposal, but please contact Hannah.Linton@nature.scot should you wish to discuss it further.

Yours sincerely,

Hannah Linton

Operations Officer – West Central Scotland

Appendix

Ornithology

Q7.1: Are consultees satisfied that the completed (and proposed) ornithological survey effort provides an acceptable, robust baseline to support the assessment?

It is our opinion that the buffer zone for breeding bird and black grouse surveys are insufficient. We advise that further surveys are conducted in the area to the west/northwest of Turbine T5 specifically. Breeding bird surveys should be within a 500m buffer, and we advise that black grouse surveys are conducted up to the forestry.

Q7.2: Do consultees have any comments regarding the EIA only concentrating on those receptors which may be subject to significant effects from the Proposed Development (either directly or indirectly)?

No, we have no comments to make.

Q7.3: Table 7.8 notes the receptors and potential impacts proposed to be included within the EIA. Do consultees agree with the list of receptors and impacts to be included within the EIA Report?

We do not think black grouse should be fully scoped out until further surveys have been conducted to the west/northwest area of the planned Turbine T5. Otherwise, we are in agreement with the other receptors and impacts.

Ecology and Nature Conservation

Q8.1: Do consultees have any comments regarding the EIA only concentrating on those receptors which may be subject to significant effects from the Proposed Development (either directly or indirectly)?

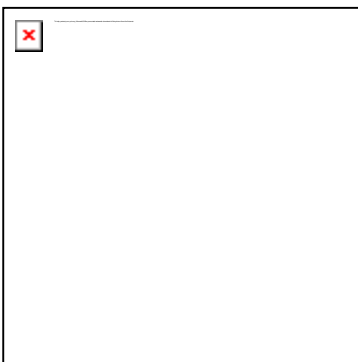
No comments

Q8.2: Are consultees satisfied that the ecological survey effort of all completed surveys and proposed surveys provides a robust assessment of effects?

We are content with the robustness of surveys carried out or proposed in the report so far.

Q8.3: Table 8.7 above notes the receptors and potential impacts proposed to be included within the EIA. Do consultees agree with the list of receptors and impacts to be included within the EIA Report?

We advise that more consideration for deer is required, and once a baseline has been outlined, impacts on deer are assessed. If this is not done, it should be clearly justified.



NatureScot is the operating name of Scottish Natural Heritage



Energy Consents Unit (ECU)
Scottish Government

Our Ref: PCS-20006038
Your Ref: ECU00006199

By email only to: Econsents_Admin@gov.scot

SEPA email contact:

planning.south@sepa.org.uk

01 August 2025

Dear Energy Consents Unit

Electricity Act 1989 - Section 36

ECU00006199

Scoping Opinion: The proposed development is for 5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells Whiteminwhill Energy Park, approx. 0.9km South of Barrhill, South Ayrshire

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development. We welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter and would especially welcome further pre-application engagement once further peat probing, peat condition assessment and habitat surveys have been completed and the layout developed further.

Our position and advice, given below, is based on the Local Authority/Scottish Ministers ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 Soils and 22 Flood risk and water management, as defined in National Planning Framework 4 (NPF4). If this is not the case, please advise so we can re-consider our position and advice. We consider that this



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also covers the requirements in NPF4 Policies 2 Climate mitigation and adaption, 3 Biodiversity and 11 Energy.

Advice for the determining authority

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to waterbodies, overlain with proposed permanent and temporary development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in [Appendix 1](#) below, which provides details of our standard information requirements for EIA development and the form in which they must be submitted, and [Appendix 2](#), which provides additional development type specific advice, be addressed to our satisfaction in the EIA process.

We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment.

1. Site-specific comments

- 1.1 In this case, where much of the site is on peat, we expect the application to be supported by a comprehensive site-specific peat management plan. At this stage, detailed information on site layout (including infrastructure such as access track routes) is not available. We would welcome further engagement once the information required in Appendix 1 is available.
- 1.2 In this case, where it is clear that much of the site is likely to be peatland and/or wetland, we suggest you may wish to go straight to carrying out national vegetation classification survey (NVC) without carrying out phase 1. For further information on assessments please refer to the Habitat survey screening for potential GWDTE section of our [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#). [Good practice during wind farm](#)

[construction | naturescot](#) also provides useful information on NVC survey method and mapping requirements.

- 1.3 A survey for Private Water Supplies (PWS) has not yet been undertaken. Although SEPA does not provide comment on potential impacts to PWS unless the assessment has progressed to Step 3 (Detailed quantitative risk assessment), as per the relevant [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#), it will be important that a survey is carried out and PWS are considered where appropriate in line with the guidance.
- 1.4 The information provided states that a Battery Energy Storage System (BESS) is proposed as part of this project. In addition to the advice provided in this letter, the applicant should refer to our specific advice on [Battery Energy Storage Systems](#).
- 1.5 Watercourse crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.

If you have queries relating to this letter, please contact us by email, via: planning.south@sepa.org.uk including our reference number in the email subject.

Your sincerely
Peter Minting
Planning Officer
Planning Service

Ecopsy to: Cameron Moyes: cameron.moyes@gov.scot

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this

time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found at sepa.org.uk/environment/land/planning/.

Appendix 1: SEPA Energy generation and transmission EIA scoping requirements

Please note that some of our planning guidance referenced in this response has been reviewed and updated to reflect the [National Planning Framework 4](#) (NPF4) policies. For example, our [Flood Risk Standing Advice](#), [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#).

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below and in [Appendix 2](#) depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

1. Site layout

- 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information.
- 1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.
- 1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development haven't avoided for example near-natural peatland, adequate justification should be

provided for the proposed layout. The justification should include how any impacts are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by maps with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.

2. Peatland and other carbon rich soils (CRS)

- 2.1 Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. Where proposals are on peatland or other CRS, the following should be submitted to address our requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage).
- 2.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.
- 2.3 The submission should include a series of layout drawings, at a usable scale, showing all permanent and temporary infrastructure, along with the ancillary construction work areas, with the extent of excavation required. These plans should be overlaid on the following:
 - a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy

in NPF4, which may be more than that outlined in the [Peatland Survey – Guidance on Developments on Peatland \(2017\)](#).

- b) Peat depth survey showing interpolated peat depths.
- c) Peatland condition mapping – the [Peatland Condition Assessment](#) photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

2.4 The detailed series of layout drawings above should clearly demonstrate that peat excavation has been avoided where possible. Where complete avoidance of peat and other CRS is not possible, justification should be provided to adequately demonstrate why this is the case, and it should be clearly demonstrated on the drawings that:

- a) Development proposals avoid any near natural peatland and the deepest areas of peat.
- b) All proposed excavation is on peat less than 1m deep, where feasible.
- c) The volumes of peat excavated have been reduced as much as possible, first through layout and then by design, making use of techniques such as floating tracks.

2.5 The Outline Peat Management Plan (PMP) must include:

- a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.
- b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas

disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed).

- c) Details of proposals for temporary storage and handling of peat – [Good Practice during Wind Farm Construction](#) outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss.
- d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use.
- e) If peat is to be used in the reinstatement of borrow pits on site, cross sections and plans should be provided showing the proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat also being given. The target restoration habitat for each borrow pit should be specified, along with how this will be maintained and managed in perpetuity.
- f) Use of excavated peat in areas not disturbed by the development itself is no longer a matter we provide planning advice on. Please refer to [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) 2023, and the [Peatland ACTION – Technical Compendium](#), which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental

authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this can be found in the document [Is it waste - Understanding the definition of waste.](#)

3. Water environment

- 3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.
- 3.2 The submission must include a set of drawings showing:
- a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies.
 - b) The minimum buffer around each waterbody, as detailed in Table 1 of [Recommended Riparian Corridor Layer for use in Land Use Planning](#), from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature.

- c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved.

3.3 Further advice and our best practice guidance are available on our sepa.org.uk/regulations/water/engineering/ webpage. Guidance on the design of water crossings can be found in the [Construction of River Crossings Good Practice Guide](#).

4. Groundwater Dependent Terrestrial Ecosystems and existing groundwater abstractions

- 4.1 The construction and operation of developments can disrupt groundwater flow and impact on Groundwater Dependent Terrestrial Ecosystems (GWDTE), which are protected under the Water Framework Directive, and existing groundwater abstractions. The layout and design of the development must avoid adverse impacts on such areas, ensuring the water environment, including GWDTE and existing groundwater abstractions, are protected.
- 4.2 As detailed in our [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#), a phased approach to the assessment of risks to GWDTE and groundwater abstractions is recommended, with greater detail being required for higher risk sites or activities.
- 4.3 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the Environmental Impact Assessment Report (EIAR) and commencement of development.

Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.4 A Phase 1 habitat survey should be provided unless the developer is already aware that GWDTE are likely to be present. Where initial assessment results indicate relevant habitats may be present, a National Vegetation Classification (NVC) survey should be submitted, along with the following information:

- a) A set of drawings demonstrating all GWDTE are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved, a conceptual site model (CSM) should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime, and the ecological features present. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling in addition to topography, properties of the emergent water and the soil, and underlying geology. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.
- c) Please note that while we will accept The UK Habitat Classification System (UKHab) as an alternative to a Phase 1 habitat survey, due to discrepancies in habitat definition and ambiguity in correspondence with NVC types, we do not accept the use of the UKHab as an alternative to NVC.

Existing groundwater abstractions

4.5 The source (rather than the property it supplies) of both public and private water supply groundwater abstractions, both within and outwith the site boundary, should be identified. Scottish Water holds information regarding public water supplies and the Local Authority holds records of private water supplies. Note that the information held by the Local Authority will sometimes relate to the property served by the

private water supply, rather than the location of the source itself (e.g. the house rather than the borehole or spring). Therefore, the details of each private water supply source require confirmation, including a site walkover survey.

4.6 The following information should be submitted where the assessment results indicate groundwater supplies may be present:

- a) A set of drawings demonstrating all groundwater abstractions are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved a conceptual site model should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

5. Flood risk

- 5.1 We reiterate that, as detailed above, our position and advice is based on the determining authority determining that the proposal is supported under Policy 22, as defined in NPF4, unless we are advised otherwise.
- 5.2 Advice on flood risk is available at [Flood Risk Standing Advice](#) and reference should also be made to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).
- 5.3 Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information

provided to justify smaller structures. Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.

- 5.4 In order to establish that the five bullet points within NPF4 Policy 22a have been satisfied and where it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our [Technical Flood Risk Guidance for Stakeholders](#) provides generic requirements for undertaking Flood Risk Assessments as well as our [Climate change allowances for flood risk assessment in land use planning](#) guidance.
- 5.5 The FRA should specifically address the following issues:
- a) All existing watercourses and drains on the site are fully identified and flow pathways understood in relation to the 1 in 200 year plus climate change flood levels for the catchment.
 - b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.
 - c) Demonstration there is no increased flood risk to existing properties in the vicinity of the proposed development and, if possible, demonstrate an improvement.
 - d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.
 - e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.

5.6 Generally, we are unable to support landraising within a flood risk area unless it is required for development outlined under the exceptions in Policy 22a of NPF4. Which, as indicated above, we understand this proposal is unless notified otherwise, and as such we may be able to accept. However, where landraising is proposed within the flood risk area identified within the FRA, it should be linked to compensatory storage and demonstrated that there is no reduction in floodplain capacity, or increased risk for others. Notwithstanding this, any landraising must be shown to be minimised as far as possible.

5.7 Culverting for land gain would not be supported by us. If any works to alter watercourse channels are proposed, we would expect betterment to the channel and utilisation of this opportunity to help reduce flood risk to the wider site and any other nearby receptors.

6. Environmental enhancements

6.1 Policy 3 of NPF4 requires all EIA development to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. EIA development should fully mitigate potential negative effects prior to identifying biodiversity enhancements, with the enhancements provided in addition to mitigation. We have published a data set which identifies where riparian planting would be most beneficial. This is available via the data publication page at sepa.org.uk/environment/environmental-data/. We highlight there may be opportunities for riparian planting along watercourses within landownership boundaries and would welcome the exploration of such planting as part of any biodiversity net gain proposals.

7. Forest removal and forest waste

7.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in substantial amounts of waste material and a peak in release of nutrients which can affect local water quality.

- 7.2 The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#) and our guidance [Management of Forestry Waste](#).

8. Pollution prevention and environmental management

- 8.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the [Guidance for Pollution Prevention](#) (GPPs), along with our sepa.org.uk/regulations/water/construction/ and sepa.org.uk/regulations/water/pollution-control/water-run-off-from-construction-sites/ webpages, for more information and advice.
- 8.2 A commitment must also be included in the schedule of mitigation that micro-siting will not encroach into sensitive areas, to avoid adversely affecting mitigation measures identified in the EIAR that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).

9. Life extension, repowering and decommissioning

- 9.1 The discarding of materials as waste should be avoided and the [waste hierarchy](#) applied to waste produced during construction, operation and decommissioning of the development. If there is an intention to discard materials then further guidance on this can be found in [Is it waste - Understanding the definition of waste](#), and our sepa.org.uk/regulations/waste/ and sepa.org.uk/regulations/waste/guidance/ webpages.

10. Other planning matters

- 10.1 For all other planning matters, we refer you and the developer to the relevant standing advice in our [Triage guidance and standing advice](#), which is also applicable to Electricity Act applications.

11. SEPA authorisation

- 11.1 We authorise several matters relating to water, waste management, radioactive substances, and pollution prevention and control. In 2018, the Scottish Government brought in the Environmental Authorisations (Scotland) Regulations 2018 (EASR 2018). The aim of these Regulations is to provide a standardised, simplified, common framework for environmental authorisations in Scotland, known as an Integrated Authorisation Framework (IAF). A copy of the draft Environmental Authorisations (Scotland) Amendment Regulations 2025 can be found at legislation.gov.uk/sdsi/2025/9780111062319/introduction.
- 11.2 The IAF is being developed in a phased manner during 2025, with the regulations applying initially to radioactive substances activities in early 2025. For further information on the amendment of the regulations please refer to our sepa.org.uk/regulations/how-we-regulate/environmental-authorisations-scotland-regulations-2018/ webpage.
- 11.3 It is an applicant's responsibility to ensure their proposals will meet all relevant regulatory requirements and they are working within regulatory guidelines. We prefer all the technical information required for any SEPA authorisations to be submitted at the same time as the planning or similar application. We consider it to be at the applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.
- 11.4 Our sepa.org.uk/regulations/ webpage provides good practice advice and guidance and defines those activities which may require authorisation by SEPA, along with details of how to contact us for more help, advice and how to apply for any necessary authorisations.

Appendix 2: SEPA's additional EIA scoping requirements by type of development

The below advice should be read in conjunction with the scoping advice in [Appendix 1](#) above.

1. Windfarm

- 1.1 Proposals for life extension, repowering and/or decommissioning of windfarms must demonstrate accordance with our guidance on the [Life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.



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Mr C Moyes
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by email: Cameron.moyes@gov.scot

Date: 14/07/2025

Dear Cameron,

ELECTRICITY ACT 1989: THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR WHITEMINWHILL ENERGY PARK

Thank you for consulting Scottish Forestry on the Scoping Report for this proposed development. Scottish Forestry is the Scottish Government agency responsible for policy, support and regulation of the forestry sector in Scotland. As such we comment on the potential impact of development proposals on forests and woodlands.

The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources.

<https://forestry.gov.scot/support-regulations/control-of-woodland-removal>

In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.

The following criteria for determining the acceptability of woodland removal should be considered relevant to this application –

- **Woodlands with a strong presumption against removal**
Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation

Is e Coilltearachd na h-Alba a' bhuidheann-ghnìomha aig Riaghaltas na h-Alba a tha an urra ri poileasaidh, taic agus riaghladh do choilltearachd

 **Scottish Government**
Riaghaltas na h-Alba

on their individual merits and such cases will require a high level of supporting evidence. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value.

- **Woodland removal with a need for compensatory planting**

Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed.

National Planning Framework 4 - Policy 6 Forestry, Woodlands and trees identifies several themes that should be considered relevant to this application –

b) Development proposals will not be supported where they will result in:

- i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*
- ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*
- iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*

c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.

d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.

As identified in the scoping report section 15.6, there are areas of ASNW on site and those should be protected from development. Whilst this area designated is quite clear, from the aerial photographs, it is clear that there is expansion of native woodland species in areas out with the designated ASNW. Whilst this is not covered by the points noted above, given that they are connected, there is a strong case for their retention.

I note that this proposal is located on principally open ground although there are some woodlands present that may be affected. The proposal is to remove some of the regenerating trees to make way for the solar development, this will mean calculating the area of woodland removal will actually be quite challenging.

Within section 15.6 there is also mention of the new access route which is intended to be built to connect to existing forest racks. As such, tree felling will be required through the existing conifer woodlands for which compensatory planting will be required. Another point to note is the source of the construction stone, if borrow pits are within the open ground then this does not

impact on forestry but if there is expansion of existing stone extraction locations within the neighbouring woodlands then those too may impact on the area of permanent woodland removal.

Other relevant comments are:

Scottish Government's policy on control of woodland removal: implementation guidance February 2019 <https://forestry.gov.scot/support-regulations/control-of-woodland-removal> provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help us reach an informed decision on the potential impact of the proposed development. Detailed information on any compensatory planting proposals should also be provided and they should provide equivalent public benefits. Due to the need for UKFS compliance, the area of compensatory planting required may exceed the net area lost.

All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard. <https://forestry.gov.scot/sustainable-forestry/ukfs-scotland>

The applicant should note that any compensatory planting required as a result of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. <https://forestry.gov.scot/support-regulations/environmental-impact-assessment> and should follow the process for preparing a woodland creation proposal, as set out in our guidance booklet: Woodland Creation Application Guidance. <https://forestry.gov.scot/support-regulations/woodland-creation>

Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in the form of LTFP amendment. <https://forestry.gov.scot/support-regulations/felling-permissions>

Please don't hesitate to contact me if you have any questions regarding Scottish Forestry's response.

Yours sincerely

REDACT

Neil Murray

Conservator
South Scotland Conservancy

Cameron Moyes
Energy Consents Unit
The Scottish Government
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Your ref:
ECU00006199

Our ref:
GB01T19K05

Date:
29/07/2025

econsents_admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

SCOPING CONSULTATION - WHITEMINWHILL ENERGY PARK

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Environmental Resources Management Ltd (ERM) in support of the above development.

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

Proposed Development

The proposed development comprises up to five wind turbines with a maximum tip height of 230m, solar photovoltaics (PV) and a Battery Energy Storage System (BESS), to be located approximately 0.9km south of Barrhill. The nearest trunk road to the site is the A77(T) which lies approximately 18km to the west whilst the A75(T) lies approximately 28km to the south via the A714.

Assessment of Environmental Impacts

Chapter 11 of the SR presents the proposed methodology for the assessment of Access, Traffic and Transport. This states that the assessment will be carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

- Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)

- Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

The SR states that the Study Area for the assessment will be confirmed once the initial access assessment has been completed, with the extent of the Study Area being confirmed in consultation with South Ayrshire Council and Transport Scotland. Transport Scotland would state that the potential impact of the development on all trunk roads proposed to be utilised as part of the delivery route strategy should be assessed.

We note that baseline traffic data will be obtained through an independent Automatic Traffic Count (ATC) survey and augmented with data from publicly available data sources where possible. Transport Scotland considers this appropriate, but we would ask that “estimated” data from the DfT site is not used. We would add that an alternative source of traffic data is Traffic Scotland’s National Traffic Data System.

In addition, Transport Scotland would state that National Road Traffic Forecast (NRTF) Low Traffic Growth assumptions will require to be used to provide a common future year baseline to coincide with the expected construction traffic peak.

It is noted that any impacts associated with the operational phase of the development are to be scoped out of the assessment. We would consider this to be acceptable in this instance.

Abnormal Loads Assessment

The SR states that the Port of Entry (PoE) for turbine components was unknown at the time of finalising the report; however, it is likely to be King George V Docks in Glasgow, the Port of Ayr, or the Port of Cairnryan. It is also stated that regardless of the chosen PoE, the AILs will approach the site from the southeast via the A75(T), A714 or B7072 and an existing Forestry Land Scotland (FLS) access road.

We would state that Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

A full Abnormal Loads Assessment report should be provided with an assessment that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA’s Glasgow Office can assist on 0141 343 9636.

Yours faithfully

REDACTED

Iain Clement

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

REDACT

From:
To: [Econsents Admin](#)
Subject: RE: Whiteminwhill Energy Park - Scoping Response
Date: 17 July 2025 21:43:39
Attachments: [image001.png](#)

Dear Cameron

**ELECTRICITY ACT 1989
 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
 (SCOTLAND) REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION
 FOR THE WHITEMINWHILL ENERGY PARK.**

Thank you for your email regarding the above request for a scoping opinion submitted by Voltalia UK Ltd. This was forwarded to the Community Council members and then discussed at the recent meeting of Barrhill Community Council (CC).

I can now confirm that I have been instructed to inform you that the decision was made that Barrhill CC will adhere to its usual policy and refrain from making comments on the scoping request. The CC prefers to wait until the actual application has been submitted and then put forward its views.

The comment was made, however, that the extremely short timescale for responses was most inappropriate.

In the meantime, the members and the community will await a future public consultation with interest and trust that you will keep the CC informed of developments as they occur. Many thanks.

Kind regards
 Celia
 Celia Strain
 Secretary, Barrhill CC

From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of**
 Econsents_Admin@gov.scot
Sent: 11 July 2025 10:42
Subject: Re: Whiteminwhill Energy Park - Scoping Response

Dear consultee,

Please be advised that the deadline for responding to the scoping request regarding Whiteminwhill Energy Park is Friday 18 July 2025. If you are unable to meet this deadline, please can you contact me regarding requesting an extension.

Kind regards,

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents
 Onshore Electricity, Strategy and Consents | Directorate for Energy and Climate Change
 Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU
cameron.moyes@gov.scot
 To view our current caseload visit www.energyconsents.scot
 Read the Energy Consents Unit's [Privacy Notice](#) on how personal information is used

Advanced notice of annual leave – I will be away from 25/7 and returning 4/8



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Patron His Majesty The King

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

Kenilworth,

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ

The
British
Horse
Society

By email

14 July 2025

Dear Sir/Madam,

Whiteminwhill Energy Park – ECU00006199

Thank you for the opportunity to respond to this scoping opinion. The British Horse Society (The BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles and is the largest and most influential equestrian charity in the UK. The BHS is committed to protecting and promoting the interests of all horses and the people who care for them through our work in education, welfare, safety and access.

Outdoor Access

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing energy infrastructure. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.

The creation and upgrading of paths and tracks within developments can be an opportunity to improve outdoor access and provide the local community with additional amenity, especially if consideration is given to laying out tracks to provide circular loops. To achieve this outcome, when completed, paths and tracks should be suitable for all users. Unconsolidated sharp stone is likely to injure horses so tracks should be finished with a layer of consolidated whin dust. Obstructions to access like locked gates or deer grids with no side gate should be avoided.

The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.

The Importance of Off-Road Riding

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences.

Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and

semi-rural areas, and areas of high horse ownership. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) - but they often have few other places to ride or no other way to access their safe off-road riding.

Vehicles travelling to and from the site are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our *"Guidance to drivers of large vehicles"* document.

The Horse and the Rural Economy

Scotland's equestrian industry is worth over £300 million to the Scottish economy annually. This figure excludes the value of the horse racing industry, which is worth a further £300 million. Equestrianism is therefore an important part of the rural economy, especially in areas of high horse ownership. Recent joint research between SRUC and The BHS showed current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society, leading to growth in the sector.

A national survey of riders who had recently given up their horse found that 27% of them had done so because they had lost access and had nowhere to ride. Failing to accommodate horses on our local path networks may lead to riders being forced to give up their horses, which in turn may damage the local economy.

I trust that the above information is of assistance. If you have any questions or would like to discuss the needs of equestrians further, please do contact me.

Kind regards,

REDACTED

Elizabeth Birtley
Access Team Manager
British Horse Society

access@bhs.org.uk
02476 840515

Guidance for Drivers of Large Vehicles

Horses are naturally nervous of large vehicles, especially if they do not often meet them. If they are very frightened, they can run away in panic. Whilst their rider or carriage driver will do all they can to prevent this, should it happen, it could cause a serious accident for the horse and rider or carriage driver and for other road users.

The main factors which cause fear in horses are:

- Being approached by a large, moving object, which may be unfamiliar or intimidating to them,
- Lack of space between themselves and the vehicle,
- The noise of the vehicle, especially air brakes,
- Picking up on the anxiety of their rider or carriage driver.

Horses have keen eyesight and due to the position of their eyes on the sides of their head, can detect vehicles approaching from behind as well as ahead. They also have very sensitive hearing and will detect an approaching vehicle, and begin to react, before their rider or carriage driver.

How can you help?

When you meet a horse on the road:

- Slow down to 10mph or less and be prepared to stop if necessary.
- Be aware that the sound of your air brakes may spook a horse.
- If a horse shows signs of nervousness as you approach, stop, turn off your engine and allow them to move away. Don't move off again until they are well clear of your vehicle.
- Pass wide and slow, when it is safe to do so – allow at least 2m between your vehicle and the horse, and drive away slowly.
- If you are approaching a horse on a narrow road and wish to pass or overtake, slow down and give the rider or carriage driver time to find a gateway, layby or other refuge to create sufficient space between the horse and your vehicle.
- Please be patient. Most riders and carriage drivers will do their best to make way as quickly and safely as they can.
- The safest place for a rider or carriage driver's hands is on the reins, so they may only be able to nod their thanks to you, but please be assured, they will be very grateful for your consideration.

Thank you for helping to keep horses, and the people who care for them, safe.

From: debra.baldwin@bt.com
To: [Econsents Admin](#); [Cameron Moyes](#)
Cc: radionetworkprotection@bt.com
Subject: WID13927T1-T5 - Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025 - ECU00006199
Date: 06 July 2025 17:35:03
Attachments: [image001.png](#)
[image002.png](#)



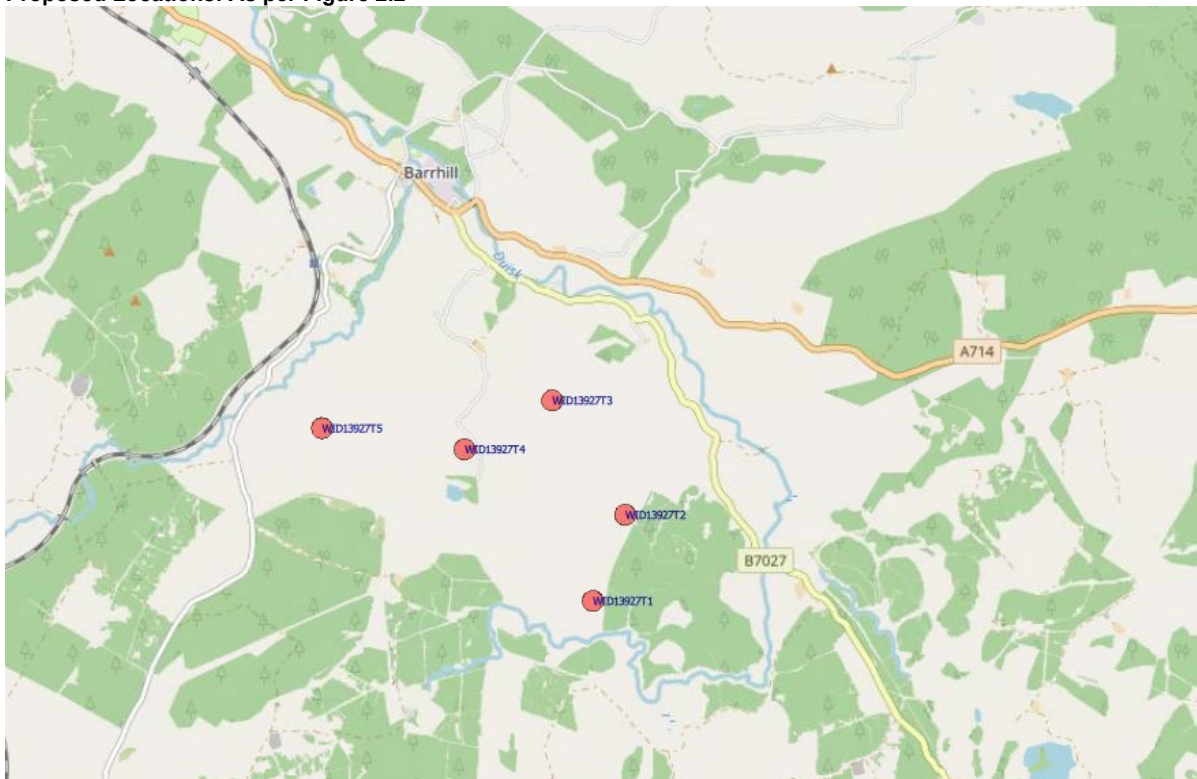
OUR REF: WID13927T1-T5

Thank you for your email dated 27/06/25.

We have studied this proposal for 5 wind turbines at Whiteminwhill Energy Park - ECU00006199, with respect to EMC and related problems to BT point-to-point microwave radio links.

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

Proposed Locations: As per Figure 2.2



BT requires 100m minimum clearance from any structure to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.

Please direct all queries to radionetworkprotection@bt.com

Debra Baldwin (TDCA)
Networks Radio Planner
Radio & Satellite Platforms



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From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of** Econsents_Admin@gov.scot

Sent: 27 June 2025 15:09

Subject: WID13927 - Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025 - ECU00006199

Dear Consultee,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR KNARIE FARM

On **6 June 2025**, **Voltaia UK Ltd.** submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the **Whiteminwhill Energy Park**. The proposed development is for **5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells**, located approximately 0.9km south of Barrhill within South Ayrshire Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information
Turbine locations – Figure 2.2
Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents
Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change
Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU
cameron.moyes@gov.scot

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**Defence
Infrastructure
Organisation**

Andy White
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: ECU00006199

E-mail: DIO-safeguarding-wind@mod.gov.uk

Our reference: DIO10067865

www.mod.uk/DIO

Cameron Moyes
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

17 July 2025

By email only

Dear Cameron,

**Electricity Act 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Request for Scoping Opinion for Proposed Section 36 Application for Whiteminwhill
Energy Park**

The proposed development is for 5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells, located approximately 0.9km south of Barrhill within South Ayrshire Council.

Thank you for consulting the Ministry of Defence (MOD) in relation to the scoping opinion through your communication dated 27 June 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that the MOD has concerns with the proposal.

The proposal concerns a development of 5 turbines with maximum blade tip heights of up to 230 metres above ground level with a Battery Energy Storage System, Solar Voltaic cells and associated infrastructure. The proposed development has been assessed using the location data (Grid References) below provided in the 'Figure 2.2 Site Layout Plan Scoping Report Whiteminwhill Energy Park', dated 30 May 2025.

Turbine no.	Easting	Northing
1	224594	578994
2	224866	579637
3	224345	580527
4	223665	580183
5	222587	580386

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to the development being their potential to create a physical obstruction to air traffic movements.

Physical Obstruction

In this case the development falls within Tactical Training Area 20T (TTA 20T), an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres above terrain features to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD would require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any Civil Aviation Authority requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

Summary

The MOD has concerns with this proposal due to the potential impact to low flying aircraft operating in the development area.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above/in the developer's document titled 'Whiteminwhill Energy Park: EIA Scoping Report' and 'Figure 2.2 Site Layout Plan Scoping Report Whiteminwhill Energy Park', both dated 30 May 2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours faithfully,

REDACTED

Andy White
Assistant Safeguarding Manager

Proposal: CONSULTATION REQUEST FROM SCOTTISH MINISTERS IN CONNECTION WITH REQUEST FOR SCOPING OPINION UNDER ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 FOR ENERGY PARK CONSISTING OF 5 WIND TURBINES (MAXIMUM TIP HEIGHT 230 METRES), SOLAR PHOTOVOLTAICS, BATTERY ENERGY STORAGE SYSTEM AND ASSOCIATED INFRASTRUCTURE WITH A TOTAL GENERATING CAPACITY IN EXCESS OF 50MW

Location: Whiteminwhill Energy Park
Approx. 0.9km South Of Barrhill
South Ayrshire

Application type: Scoping Opinion

Ref: 25/1253/CSG

1. This scoping request from the Scottish Government Energy Consents Unit relates to a proposal by Voltaia UK Ltd to construct and operate a development comprising 5 wind turbines (maximum tip height 230 metres), solar photovoltaics, battery energy storage system and associated infrastructure with a total generating capacity in excess of 50MW.

2. The development is aiming to produce over 50MW of energy and would be located within the administrative area of South Ayrshire Council.

3. The Planning Service consulted the following departments of Dumfries and Galloway Council:

Council Countryside Access Officer
Council Flood Risk Management Team Leader
Council Environmental Health Officer
Council Roads Planning Team Leader
Council Archaeologist
Council Contaminated Land Senior Technician
Council Biodiversity Project Officer
Council Senior Planner, Built Heritage Policy

To date responses from the Council's Countryside Access Officer, Roads Planning Team Leader, Contaminated Land Senior Technician, Biodiversity Project Officer, Senior Planner, Built Heritage Policy, are outstanding. Once responses are received, they will be forwarded on to you separately as an appendix to this report. The received responses are as follows:

4. Council Flood Risk Management Team Leader

No objection.

5. Environmental Health Officer

We have no objections in principle. However, until a site specific noise impact assessment has been carried out following the principles detailed in the Assessment & Rating of Noise from Wind Farms ETSU Report ETSU-R-97, 1996 we would be unable to comment fully as to the expected impacts.

The site specific assessment should be carried out following the principles detailed in the Assessment & Rating of Noise from Wind Farms ETSU Report ETSU-R-97, 1996 and Good Practice Guide.

We suggest that the proposal should be designed to meet the lower noise limits as specified in the ETSU-R-97 document, but where lower limits cannot be achieved the detailed reasons as to why this cannot be accomplished should be detailed in the ETSU-R-97 report within the Environmental Impact Assessment.

We additionally suggest that a method statement for the construction project should be provided within the EIA for approval by Dumfries & Galloway Council. This should include an assessment of potentially noisy operations and outline the noise mitigation measures proposed. This will also include a programme and phases for each stage of work. Guidance as to construction noise prediction methodology may be found within BS5228:2009.

6. Archaeology

In assessing archaeological potential, the term 'historic environment' includes historic landscapes; above ground heritage features; known and as yet unknown archaeology; records of past environmental changes and land use; cultural identity; and living heritage.

As the footprint is located entirely within South Ayrshire, there are no direct impacts on HER assets in Dumfries and Galloway council area. The development plans to use existing roadways in D&G to carry traffic to and from the development site, which causes no significant impact on HER assets in the region. If additional tracks and cable lines are proposed in future, it is possible that these could impact on HER assets in the region and, in this case, we would recommend further consultation before any changes are implemented.

Regionally significant sites within 5km where longer distance views form part of the setting have been included, as well as nationally significant sites out to 10km. Having reviewed the ZTV provided by the applicant, we can see no significant setting impacts on HER assets within Dumfries and Galloway as long as the proposal is not subject to change.

Recommendation:

The application as it stands does not raise any significant policy issues that that would result in a recommendation for refusal of planning permission in relation to impact on cultural heritage assets located within Dumfries & Galloway region.

Policy Background:

National Planning Framework 4 (NFP4):
Policy 7: Historic Assets and Places

The Scottish Government Planning Advice Note (PAN) 2/2011 Section 28

Historic Environment Policy for Scotland (HEPS):
HEP1
HEP 4

Dumfries & Galloway Council Local Development Plan 2:
OP1: Development Considerations b) Historic Environment
Policy OP2: Design and Placemaking
Policy HE3: Archaeology

I trust the above information, which is given without prejudice to any future decision of the Council, is of assistance.

From: [Brian Davidson](#)
To: [Econsents Admin](#)
Cc: [Stuart Brabbs \(stuart@ayrshirerivertrust.org\)](mailto:stuart@ayrshirerivertrust.org); [River Stinchar District Salmon Fishery Board](#)
Subject: RE: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025
Date: 03 July 2025 11:56:54
Attachments: [image001.png](#)

Dear Cameron,

Thank you for your correspondence concerning the proposed Whiteminwhill Energy Park.

Fisheries Management Scotland (FMS) represents the network of Scottish District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries and the fishery trusts who provide a research, educational and monitoring role for all freshwater fish.

FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal.

The proposed development falls within the catchments relating to the Stinchar District Salmon Fishery Board and Ayrshire Rivers Trust. It is important that the proposals are conducted in full consultation with the relevant board and trust (see link to FMS member DSFBs and Trusts below). We have also copied this response to both organisations.

Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.

- [LINK TO ADVICE ON TERRESTRIAL WINDFARMS](#)
- [LINK TO FMS MEMBER NETWORK CONTACT DETAILS](#)

Kind regards,

Brian

Brian Davidson | Director of Operations

Fisheries Management Scotland
11 Rutland Square, Edinburgh, EH1 2AS
Tel: 0131 221 6567 | 075844 84602
www.fms.scot

From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of**
Econsents_Admin@gov.scot

Sent: 27 June 2025 15:09

Subject: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025

Dear Consultee,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36
APPLICATION FOR KNARIE FARM**

On **6 June 2025**, **Volitalia UK Ltd.** submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the **Whiteminwhill Energy Park**. The proposed development is for **5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells**, located approximately 0.9km south of Barrhill within South Ayrshire Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information
Turbine locations – Figure 2.2
Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there

are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to
Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents | Directorate for Energy and Climate Change
 Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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Katie Butchart

From: #GLA Safeguarding <GLASafeguard@glasgowairport.com>
Sent: 14 July 2025 14:30
To: Econsents Admin
Subject: RE: Whiteminwhill Energy Park - Scoping Response FAO Cameron Moyes

Dear Cameron

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

Kind regards
 Kirsteen



#GLA Safeguarding
 #GLA Safeguarding

07808 115 881
 glasafeguard@glasgowairport.com
 www.glasgowairport.com

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

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From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of** Econsents_Admin@gov.scot
Sent: 11 July 2025 10:42
Subject: Re: Whiteminwhill Energy Park - Scoping Response

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Dear consultee,

Please be advised that the deadline for responding to the scoping request regarding Whiteminwhill Energy Park is Friday 18 July 2025. If you are unable to meet this deadline, please can you contact me regarding requesting an extension.

Kind regards,

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change
 Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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Advanced notice of annual leave – I will be away from 25/7 and returning 4/8



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Katie Butchart

From: Ian Hutchinson <ihutchinson@glasgowprestwick.com>
Sent: 11 July 2025 10:53
To: Econsents Admin
Cc: Safeguarding
Subject: RE: External - Re: Whiteminwhill Energy Park - Scoping Response

Hi Cameron,

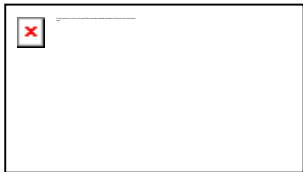
On behalf of Glasgow Prestwick Airport, I have reviewed the documentation available on the ECU Portal regarding Whiteminwhill Energy Park (ECU00006199)

The proposed development benefits from a substantial level of terrain shielding from the Primary Surveillance Radar at the Airport and is well below all Instrument Flight Procedures and their associated protected surfaces and levels. Consequently, we would have no comment or valid objection to make to the proposal at present.

In the event the application proceeds to a full Section 36 Application, a further safeguarding assessment will be completed, and we will update our response at that time if necessary.

Kind regards,

Ian



Glasgow Prestwick Airport Ltd.
Aviation House
Prestwick
KA9 2PL
Scotland
United Kingdom

Ian Hutchinson

Aerodrome Safeguarding Manager

T: (+44) 01292 511038

M: 07561 685249

ihutchinson@glasgowprestwick.com

www.glasgowprestwick.com

From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of** Econsents_Admin@gov.scot
Sent: 11 July 2025 10:42
Subject: External - Re: Whiteminwhill Energy Park - Scoping Response

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Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change

Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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Katie Butchart

From: LUP enquiries <LUPenquiries@hse.gov.uk>
Sent: 30 June 2025 14:16
To: Econsents Admin
Subject: RE: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025

Dear Cameron,

Thank you for your consultation of 30/06/2025 sent to HSE's Chemical, Explosives and Microbiological Hazards Division (CEMHD) requesting comments on the proposed section 36 application for Whiteminwhill Energy Park (ECU00006199).

HSE's interest in applications for consent to construct and operate wind farms and battery energy storage stations such as the Whiteminwhill Energy Park is very limited and our position on this application is as follows:

1. HSE has an interest in proposals where developments will be located in HSE planning consultation zones relevant to major accident hazards.

HSE's [Planning Advice web app](#) is publicly available (registration is required) to check if a development area is within HSE zones.

In this case, a check of our land use planning consultation zones shows the development area is not within any HSE-licensed explosive safeguarding zones and is not within any HSE consultation zones.

2. HSE is a statutory consultee for proposed developments that would have hazardous substances (such as hydrogen) present at or above threshold quantities (see the Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015). However, this proposal does not appear to be of this type.

Overall, HSE's CEMHD does not need to be consulted on the application and has no comments.

Kind regards,
Tim

HSE's Land Use Planning Support Team
Health and Safety Executive | Chemicals, Explosives and Microbiological Division 5
lupenquiries@hse.gov.uk



For HSE's Land Use Planning Advice Terms and Conditions, please click on the following link [HSE's Planning Advice Web App - Login](#) ([hsl.gov.uk](https://forms.office.com/e/twNgwPKE9x)) and then click on 'terms and conditions'.

The Health and Safety Executive (HSE) is conducting a programme of research to understand the needs of people using their services for Land Use Planning Advice (including HSE's planning advice web app), Hazardous Substances Consent and their related guidance. This helps us create services that work better for the public and for government. Participation is voluntary. If you would like to be informed about opportunities to participate, please read and complete this consent form: <https://forms.office.com/e/twNgwPKE9x>. If you need a different format or have questions about this research, please contact the user research team on LUPuserresearch@hse.gov.uk and we will do our best to help. Thank you.

From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> On Behalf Of Econsents_Admin@gov.scot

Sent: 27 June 2025 15:09

Subject: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025

Dear Consultee,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
KNARIE FARM**

On **6 June 2025**, **Volitalia UK Ltd.** submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the **Whiteminwhill Energy Park**. The proposed development is for **5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells**, located approximately 0.9km south of Barrhill within South Ayrshire Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information
Turbine locations – Figure 2.2
Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change

Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym.

Rhowch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

Katie Butchart

From: LUP enquiries <LUPenquiries@hse.gov.uk>
Sent: 06 August 2025 09:19
To: Econsents Admin
Subject: Re: Whiteminwhill Scoping Request Error

Dear Cameron Moyes,

Thank you for your consultation of 05 August 2025 (sent to HSE's email address HazSubConsent.CEMHD5@hse.gov.uk), for HSE's view on the proposed S36 application of the Electricity Act 1989 for Whiteminwhill Energy Park.

Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

- HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.
- HSE is not responding in our regulatory role in the health and safety system

1. The proposed development, is not a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.

2. The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.

3. The development is not located within HSE's land-use-planning consultation zones for major accident hazard pipelines and hazardous substances consented sites (licensed explosives sites are covered in the previous paragraph).

Due to the above 3 points, HSE have no views on the additional information provided.

4. If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please directly consult the operator of the establishment, as appropriate.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

Kind regards,
Ceri

HSE's Land Use Planning Support Team
Health and Safety Executive | Chemicals, Explosives and Microbiological Division 5
lupenquiries@hse.gov.uk

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From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot>

Sent: Tuesday, August 5, 2025 12:25 PM

Subject: Whiteminwhill Scoping Request Error

Dear consultees,

There has been an error in our documentation when requesting a scoping opinion for Whiteminwhill Energy Park sent on June 27th 2025.

The original consultation email request referenced Knarie Wind Farm in the title, but Whiteminwhill Energy Park in the rest of the email.

To confirm, the consultation request is for **Whiteminwhill Energy Park** and not Knarie Wind Farm.

Please find attached the amended consultation request for your reference.

Please accept my sincere apologies for any inconvenience caused.

Kind regards,

Cameron

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents | Directorate for Energy and Climate Change

Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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Os nad chi yw'r derbynnydd bwriadedig, mae unrhyw ddatgeliad, copïo, dosbarthu neu unrhyw gamau eraill a gymerir gan ddefnyddio'r wybodaeth sydd yn yr e-bost hwn wedi'u gwahardd yn llym. Rhowch wybod i'r anfonwr am y gwall fel y gellir dilyn gweithdrefnau mewnol, a dileu'r cyfathrebiad o'ch system ar unwaith wedi hynny.

Katie Butchart

From: Joint Radio Company <wftracker@jrc.co.uk>
Sent: 01 July 2025 13:05
To: Econsents Admin
Subject: Re: Whiteminwhill Energy Park - Response requested by 18th July 2025 - Scoping Consultation Request

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

Dear

Planning Ref: **ECU00006199**

Name/Location: **Whiteminwhill Energy Park**

Site Centre/Turbine(s) at NGR:

Turbine	Easting	Northing
T1	224594	578995
T2	224867	579638
T3	224345	580527
T4	223665	580184
T5	222588	580386

Development Radius: 0.1km

Hub Height: 149m Rotor Radius: 81m

This proposal is **cleared - subject to 50m Micrositing** - with respect to radio link infrastructure operated by the local energy 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.

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, developers are advised to

seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC](#) | [Joint Radio Company](#) | [JRC](#)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact anita.lad@jrc.co.uk.

On Fri, 27 Jun at 10:08 AM , econsents_admin <econsents_admin@gov.scot> wrote:
Dear Consultee,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
KNARIE FARM**

On **6 June 2025**, **Volitalia UK Ltd.** submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the **Whiteminwhill Energy Park**. The proposed development is for **5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells**, located approximately 0.9km south of Barrhill within South Ayrshire Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information
Turbine locations – Figure 2.2
Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change
Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU
cameron.moyes@gov.scot

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Katie Butchart

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 01 July 2025 12:08
To: Econsents Admin
Subject: RE: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025 [SG39665]

Our Ref: SG39665

Dear Sir/Madam

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

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

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

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

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



NATS Internal

From: Cameron.Moyes@gov.scot <Cameron.Moyes@gov.scot> **On Behalf Of** Econsents_Admin@gov.scot
Sent: 27 June 2025 15:09
Subject: [EXTERNAL] Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025

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Dear Consultee,

**ELECTRICITY ACT 1989
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REGULATIONS 2017**

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- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information
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Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents | Directorate for Energy and Climate Change

Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

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

Network Rail
Town Planning
151 St Vincent Street
Glasgow
G2 5NW

Martin Henderson
Town Planning Technician

Planning reference: ECU00006199
Case Officer: Cameron Moyes

E-Mail:
TownPlanningScotland@networkrail.co.uk

Network Rail ref: 237 2025
10/07/2025

Dear Mr Moyes,

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36
APPLICATION FOR WHITEMINWHILL ENERGY PARK**

Thank you for consulting Network Rail regarding the above development.

We would strongly suggest that reference to the issues below are included in the Scoping Opinion to ensure that potential impacts of both the construction and completed development on the current and future safe and efficient operation of the railway are assessed:

- A Traffic Assessment should be included to assess the effects of construction traffic on existing traffic flows and the public road network. Preferred construction traffic routes should be indicated. This will enable Network Rail to assess the possible impacts where/if the traffic crosses over/under our infrastructure and the suitability of these crossings.

Yours sincerely

REDACTED

Martin Henderson
Town Planning Technician

Katie Butchart

From: ONR Land Use Planning <ONR-Land.Use-Planning@onr.gov.uk>
Sent: 01 July 2025 14:37
To: Econsents Admin
Subject: ONR Land Use Planning - Application ECU00006199 - Whiteminwhill Energy Park
Attachments: image001.png

Dear Sir/Madam,

With regard to planning application ECU00006199 - Whiteminwhill Energy Park, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here:
(<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Land Use Planning
Office for Nuclear Regulation
ONR-Land.Use-planning@onr.gov.uk

-----Original Message-----

From: Econsents - Scottish Government <econsents_admin@gov.scot >
To:
Cc:
Sent: 27/06/2025 15:08
Subject: Scoping Consultation Request - Whiteminwhill Energy Park - Response requested by 18th July 2025

Dear Consultee,

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017**

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR KNARIE FARM

On **6 June 2025**, **Volitalia UK Ltd.** submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the **Whiteminwhill Energy Park**. The proposed development is for **5 wind turbines with a maximum blade tip of up to 230m, Battery Energy Storage and Solar Photovoltaic cells**, located approximately 0.9km south of Barrhill within South Ayrshire Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

Under regulation 12, Scottish Ministers are required to provide a scoping opinion outlining the information they consider should be included in the EIA report. Ministers are also required to consult the relevant consultation bodies and any other interested party which is likely to have an interest in the proposed development by reason of its specific environmental responsibilities or local and regional competencies.

The scoping report and supporting information can be viewed at the Scottish Government's Energy Consents Unit website www.energyconsents.scot by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing **Whiteminwhill Energy Park** into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00006199** and then click on **Documents** tab.

The indicative wind turbine layout can be found in **Figure 2.2** and will be finalised throughout the EIA process. The table below has pertinent information which you may find useful:

Information

Turbine locations – Figure 2.2
Rotor Diameter – 162 m
Hub Height – 149 m
Blade height to Tip – 230 m

To allow Scottish Ministers to provide a comprehensive scoping opinion, we ask that you review the scoping report and advise on the scope of the environmental impact assessment for this proposal. Please advise if there are any further matters you would like Ministers to highlight for consideration and inclusion in the assessment, particularly site-specific information.

I would be grateful for your comments by **18 July 2025**. If we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

Please send your response (in PDF format if possible) to Econsents_Admin@gov.scot

If you have any queries regarding this email or issues accessing the scoping documents, please do not hesitate to contact me.

Regards

Cameron Moyes

Cameron Moyes | Case and Systems Officer | Energy Consents

Onshore Electricity, Strategy and Consents| Directorate for Energy and Climate Change
Scottish Government | 5 Atlantic Quay, 150 Broomielaw, Glasgow G2 8LU

cameron.moyes@gov.scot

To view our current caseload visit www.energyconsents.scot

Read the Energy Consents Unit's [Privacy Notice](#) on how personal information is used



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Thursday, 10 July 2025



Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

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

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



Dear Customer,

Whiteminwhill Energy Park, Barrhill, South Ayrshire, KA26 0QT

Planning Ref: ECU00006199

Our Ref: DSCAS-0136169-F8V

Proposal: Construction and operation of the proposed Whiteminwhill Energy Park. Whiteminwhill Energy Park will comprise of up to five wind turbines up to 230m tip height, solar photovoltaics (PV), Battery Energy Storage System (BESS), associated infrastructure and an anticipated total generating capacity in excess of 50MW.

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that 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.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Ruth Kerr

Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - Site Investigation Services (UK) Ltd
 - Tel: 0333 123 1223
 - Email: sw@sisplan.co.uk
 - www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Development Operations department at the above address.
- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) advice on freshwater and diadromous fish and fisheries in relation to onshore wind farm developments.

July 2020 updated September 2023

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provides internal, non-statutory, advice in relation to freshwater and diadromous fish and fisheries to the Scottish Government's Energy Consents Unit (ECU) for onshore wind farm developments in Scotland.

Atlantic salmon (*Salmo salar*), sea trout and brown trout (*Salmo trutta*) are of high economic value and conservation interest in Scotland and for which MD-SEDD has in-house expertise. Onshore wind farms are often located in upland areas where salmon and trout spawning and rearing grounds may also be found. MD-SEDD aims, through our provision of advice to ECU, to ensure that the construction and operation of these onshore developments do not have a detrimental impact on the freshwater life stages of these fish populations.

The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity Index and support valuable recreational fisheries.

A good working relationship has been developed over the years between ECU and MD-SEDD, which ensures that these fish species are considered by ECU during all stages of the application process of onshore wind farm developments and are similarly considered during the construction and operation of future onshore wind farms. It is important that matters relating to freshwater and diadromous fish and fisheries, particularly salmon and trout, continue to be considered during the construction and operation of future onshore wind farms.

In the current document, MD-SEDD sets out a revised, more efficient approach to the provision of our advice, which utilises our generic scoping and monitoring programme guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>). This standing advice provides regulators (e.g. ECU, local planning authorities), developers and consultants with the information required at all stages of the application process for onshore wind farm developments, such that matters relating to freshwater and diadromous fish and fisheries are addressed in the same rigorous manner as is currently being carried out and continue to be fully in line with EIA regulations. At the request of ECU, MD-SEDD will still be able to provide further and/or bespoke advice relevant to freshwater and diadromous fish and fisheries e.g. site specific advice, at any stage of the application process for a proposed development, particularly where a development may be considered sensitive or contentious in nature.

MD-SEDD will continue undertaking research, identifying additional research requirements, and keep up to date with the latest published knowledge relating to the

impacts of onshore wind farms on freshwater and diadromous fish populations. This will be used to ensure that our guidelines and standing advice are based on the best available evidence and also to continue the publication of the relevant findings and knowledge to all stakeholders including regulators, developers and consultants.

MD-SEDD provision of advice to ECU

- MD-SEDD should not be asked for advice on pre application and application consultations (including screening, scoping, gate checks and EIA applications). Instead, the MD-SEDD scoping guidelines and standing advice (outlined below) should be provided to the developer as they set out what information should be included in the EIA report;
- if new issues arise which are not dealt with in our guidance or in our previous responses relating to respective developments, MD-SEDD can be asked to provide advice in relation to proposed mitigation measures and monitoring programmes which should be outlined in the EIA Report (further details below);
- if new issues arise which are not dealt with in our guidance or in our previous responses, MD-SEDD can be asked to provide advice on suitable wording, within a planning condition, to secure proposed monitoring programmes, should the development be granted consent;
- MD-SEDD cannot provide advice to developers or consultants, our advice is to ECU and/or other regulatory bodies.
- if ECU has identified specific issues during any part of the application process that the standing advice does not address, MD-SEDD should be contacted.

MD-SEDD Standing Advice for each stage of the EIA process

Scoping

MD-SEDD issued generic scoping guidelines

(<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

If a developer identifies new issues or has a technical query in respect of MD-SEDD generic scoping guidelines then ECU should be informed who will then co-ordinate a response from MD-SEDD.

Gate check

The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application.

Developers will be required to provide a gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.

EIA Report

MD-SEDD will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/status/Pressures>). The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process:

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:

- any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area;
- the presence of a large density of watercourses;
- the presence of large areas of deep peat deposits;
- known acidification problems and/or other existing pressures on fish populations in the area; and
- proposed felling operations.

Post-Consent Monitoring

MD-SEDD recommends that a water quality and fish population monitoring programme is carried out to ensure that the proposed mitigation measures are effective. A robust, strategically designed and site specific monitoring programme conducted before, during and after construction can help to identify any changes, should they occur, and assist in implementing rapid remediation before long term ecological impacts occur.

MD-SEDD has published guidance on survey/monitoring programmes associated with onshore wind farm developments (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which developers should follow when drawing up survey and/or monitoring programmes.

If a developer considers that such a monitoring programme is not required then a clear justification should be provided.

Planning Conditions

MD-SEDD advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent. We recommend, where required, that a Water Quality Monitoring Programme, Fisheries Monitoring Programme and the appointment of an Ecological Clerk of Works, specifically in overseeing the above monitoring programmes, is outlined within these conditions and that MD-SEDD is consulted on these programmes.

Wording suggested by MD-SEDD in relation to water quality, fish populations and fisheries for incorporation into planning consents:

1. No development shall commence unless a Water Quality and Fish Monitoring Plan (WQFMP) has been submitted to and approved in writing by the Planning Authority in consultation with Marine Directorate – Science Evidence Data and Digital (MD–SEDD) and any such other advisors or organisations.
2. The WQFMP must take account of the Scottish Government’s MD-SEDD guidelines and standing advice and shall include:
 - a. water quality sampling should be carried out at least 12 months prior to construction commencing, during construction and for at least 12 months after construction is complete. The water quality monitoring plan should include key hydrochemical parameters, turbidity, and flow data, the identification of sampling locations (including control sites), frequency of sampling, sampling methodology, data analysis and reporting etc.;
 - b. the fish monitoring plan should include fully quantitative electrofishing surveys at sites potentially impacted and at control sites for at least 12 months before construction commences, during construction and for at least 12 months after construction is completed to detect any changes in fish populations; and
 - c. appropriate site specific mitigation measures detailed in the Environmental Impact Assessment and in agreement with the Planning Authority and MD-SEDD.
3. Thereafter, the WQFMP shall be implemented within the timescales set out to the satisfaction of the Planning Authority in consultation with MD- SEDD and the results of such monitoring shall be submitted to the Planning Authority on a 6 monthly basis or on request.

Reason: To ensure no deterioration of water quality and to protect fish populations within and downstream of the development area.

Sources of further information

NatureScot (previously “SNH”) guidance on wind farm developments -

<https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/renewable-energy-development/onshore-wind-energy/advice-wind-farm>

Scottish Environment Protection Agency (SEPA) guidance on wind farm developments –

<https://www.sepa.org.uk/environment/energy/renewable/#wind>

A joint publication by Scottish Renewables, NatureScot, SEPA, Forestry Commission Scotland, Historic Environment Scotland, Marine Scotland Science (now MD-SEDD) and Association of Environmental and Ecological Clerks of Works (2019) Good Practice during Wind Farm Construction -

<https://www.nature.scot/guidance-good-practice-during-wind-farm-construction>.

Annex 1 (revised September 2023)

Marine Directorate – Science Evidence Data and Digital (MD-SEDD) – EIA Checklist

The generic scoping guidelines should ensure that all matters relevant to freshwater and diadromous fish and fisheries have been addressed and presented in the appropriate chapters of the EIA report. Use of the checklist below should ensure that the EIA report contains the following information; the absence of such information ***may necessitate requesting additional information*** which could delay the process:

MD-SEDD Standard EIA Report Requirements	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. A map outlining the proposed development area and the proposed location of: ○ the turbines, ○ associated crane hard standing areas, ○ borrow pits, ○ permanent meteorological masts, ○ access tracks including watercourse crossings, ○ all buildings including substation, battery storage; ○ permanent and temporary construction compounds; ○ all watercourses; and ○ contour lines;			

2. A description and results of the site characterisation surveys for fish (including fully quantitative electrofishing surveys) and water quality including the location of the electrofishing and fish habitat survey sites and water quality sampling sites on the map outlining the proposed turbines and associated infrastructure. This should be carried out where a Special Area of Conservation (SAC) is present and where salmon are a qualifying feature, and in exceptional cases when required in the scoping advice for other reasons. In other cases, developers can assume that fish populations are present;			
3. An outline of the potential impacts on fish populations and water quality within and downstream of the proposed development area;			
4. Any potential cumulative impacts on the water quality and fish populations associated with adjacent (operational and consented) developments including wind farms, hydro schemes, aquaculture and mining;			

5. Any proposed site specific mitigation measures as outlined in MD-SEDD generic scoping guidelines and the joint publication “Good Practice during Wind Farm Construction” (https://www.nature.scot/guidance-good-practice-during-wind-farm-construction);			
6. Full details of proposed monitoring programmes using guidelines issued by MD-SEDD and accompanied by a map outlining the proposed sampling and control sites in addition to the location of all turbines and associated infrastructure. At least 12 months of baseline pre-construction data should be included. The monitoring programme can be secured using suitable wording in a condition.			
7. A decommissioning and restoration plan outlining proposed mitigation/monitoring for water quality and fish populations. This can be secured using suitable wording in a condition.			

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:	Provided in application YES/NO	If YES – please signpost to relevant chapter of EIA Report	If not provided or provided different to MD-SEDD advice, please set out reasons.
1. Any designated area (e.g. SAC), for which fish is a qualifying feature, within and/or downstream of the proposed development area;			
2. The presence of a large density of watercourses;			
3. The presence of large areas of deep peat deposits;			
4. Known acidification problems and/or other existing pressures on fish populations in the area; and			
5. Proposed felling operations.			