



EIA: Supplementary Environmental Information

Sandy Knowe Wind Farm Extension

SEI Chapter 1: Introduction

Sandy Knowe Wind Farm Limited



October 2023



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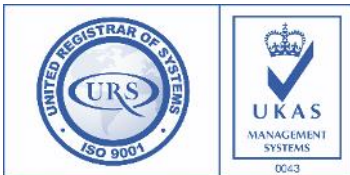
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Version	Date	Reason
1.1	October 2023	Original Issue



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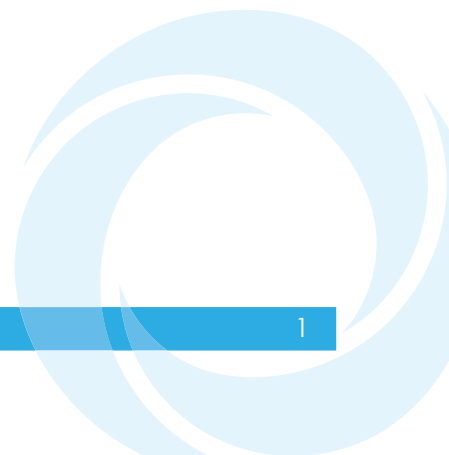
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Glossary of Terms

Term	Definition
The Applicant	Sandy Knowe Wind Farm Limited
The Agent	ERG Holding UK Limited
Environmental Advisors and Planning Consultants	Atmos Consulting Limited
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
Environmental Impact Assessment Regulations	The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	The Sandy Knowe Wind Farm Extension
The Proposed Development Footprint	The area within which the Proposed Development will be located
The Proposed Development Site	The full application boundary including Sandy Knowe Wind Farm and Sandy Knowe Wind Farm Extension

List of Abbreviations

Abbreviation	Description
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
NTS	Non-Technical Summary
SEI	Supplementary Environmental Information



1 Introduction

1.1 Background

In August 2022, Sandy Knowe Wind Farm Limited ('the Applicant') submitted a planning application (ECU Ref: ECU00003274) seeking consent and deemed planning permission under Section 36 of the Electricity Act (Scotland) 1989 (as amended) for the construction and operation of a generating station known as Sandy Knowe Wind Farm Extension (the 'Proposed Development'). Should consent be granted it is requested that deemed planning permission under Section 57 of the Town and Country Planning (Scotland) Act 1997 (the '1997 Act') also be deemed to be granted.

Sandy Knowe Wind Farm Limited is an associated company of ERG UK Holding Ltd (ERG), who were previously identified as the Applicant with the planning application (ECU Ref: ECU00003274).

The application included an Environmental Impact Assessment (EIA) Report, prepared in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (the 'EIA regulations') (the 2022 EIA).

The Proposed Development lies adjacent to the Sandy Knowe Wind Farm which was consented in July 2020 by Scottish Ministers (ECU Ref: ECU00000660) and consists of 24 wind turbines (at 125m tip height) and associated infrastructure. The anticipated output of the Sandy Knowe Wind Farm is 86.4MW and the project is currently operational.

The temporary borrow pit D (BPD), opened for the construction of Sandy Knowe Wind Farm under Dumfries and Galloway Council (DGC) (Reference 20/0809/FUL), is also referred to within this SEI. As outlined in the 2022 EIA Volume 1 Chapter 3 Description of Development, it is the intention that BPD will be used for the excavation of on-site aggregate for use in the construction of the Proposed Development and for peat reinstatement.

An extension to the excavation area/volume of BPD will therefore be required. BPD was excavated to a greater extent than was originally consented and this SEI seeks to regularise the original planning approval, formalising BPD in its current form for use by the Applicant. This is considered in SEI Chapter 4 Outline Borrow Pit Restoration Plan (OBPRP). In the event that consent is not granted for the Proposed Development, the Applicant has committed to reinstating BPD to the Local Authority's full satisfaction.

The Proposed Development will have an indicative turbine output of approximately 21.6MW and an indicative battery storage capacity of 28.4MW. The combined export capacity will not exceed 50MW. The wind farm will be known as Sandy Knowe Wind Farm Extension.

The area within which the Proposed Development will be located is defined as the 'Proposed Development Footprint' which encompasses the Proposed Development infrastructure which includes any land used for turbines, hardstanding, site access or where construction work is carried out. It also includes areas of the consented Sandy Knowe Wind Farm such as consented / constructed tracks, temporary construction compounds, a borrow pit, and substation.

The Application Boundary, hereafter referred to as the 'Proposed Development Site' includes relevant parts of the Sandy Knowe Wind Farm and the Proposed Development Footprint.

The Proposed Development Site is centred on National Grid Reference (NGR) (approximate) NS 68631 10692 and is illustrated in Figure 1-1 of the 2022 EIA. The Proposed Development Footprint is centred on (NGR) (approximate) NS 69292 10825 and illustrated in Figure 1-2 of the 2022 EIA.

The Proposed Development requires consent by Scottish Ministers under Section 36 of the Electricity Act (Scotland) 1989 (as amended) given that the Proposed Development is viewed as an 'extension' to the Sandy Knowe Wind Farm.

Following the submission of the planning application, consultees made representations to the ECU providing comments on the Proposed Development. This Supplementary Environmental Information (SEI) report has been prepared to present additional information in response to consultee comments including those from Scottish Environment Protection Agency (SEPA) and Dumfries and Galloway Council (DGC).

1.2 The Applicant

The Proposed Development is an extension of the operational Sandy Knowe Wind Farm. Sandy Knowe Wind Farm is owned by Sandy Knowe Wind Farm Limited (SKWFL) (the 'Applicant'). SKWFL is 100% owned by ERG UK Holding Ltd (the 'Agent'). ERG Holding UK Ltd is a subsidiary of the ERG Group.

ERG Group is a European renewable power producer, with an office in Edinburgh, which has been operating successfully in the energy sector for 80 years.

In recent years ERG has transformed itself from one of Italy's leading oil and refining companies to one focussed wholly on green power. ERG is active in nine countries — in the UK, France, Germany, Poland, Romania, Bulgaria, Sweden, Spain and Italy, where it is now the leading wind energy operator owning and operating wind farms with a total installed capacity of approximately 2GW.

ERG owns and operates c.250MW of capacity from wind farms in Scotland and Northern Ireland.

The Applicant is committed to investing in Dumfries and Galloway through renewable energy projects, with the community benefits and additional outcomes that renewable energy development can bring (including construction and post construction employment).

1.3 Proposed Development Footprint and Setting

1.3.1 Introduction

A summary of the location, setting and context of the Proposed Development is provided in the following sections. Full details are provided in the 2022 EIA (Chapter 3 and Chapters 5 to 12).

1.3.2 Land use and context

The Proposed Development Footprint is located within the Dumfries and Galloway Council area, on the hills south of the A76 to the south-west of Kirkconnel. With a total area of approximately 300 hectares (ha), it is located on the northern fringes of the Southern Uplands, to the south of the undulating upland hills and plateaux area that extends towards the Clyde Valley to the north.

The Proposed Development Footprint is focused to the south of the Nithsdale on the lower-lying northern slopes of hills which include High Cairn (553m Above Ordnance Datum (AOD)) and White Hill (418m AOD). The surrounding area is largely characterised by moorland landcover with blocks of coniferous forest cover. Sandy Knowe Wind Farm, which strongly influences the surrounding landscape character is located to the immediate south-east of the Proposed Development Footprint.

Site access will be provided along the existing site access to Sandy Knowe Wind Farm, which joins the A76 to the north of the Proposed Development Footprint.

A number of small upland watercourses pass through the Proposed Development Footprint, including the Polhote Burn within the western part of the Proposed Development Site. These are tributaries that flow north across the Proposed Development Footprint into the River Nith, which flows south-east and joins the Solway Firth to the south of Dumfries.

The closest settlement is Kirkconnel, located approximately 2.5km to the north-east; the larger settlement of New Cumnock is located approximately 6km to the north-west. There are also several individual properties located within close proximity, located off the A76 to the north.

The closest properties, High Cairn Cottage and Crockroy Cottage, are located approximately 900m north of the nearest turbines. These properties are financially involved in the Proposed Development. The nearest non-involved property (Polneul) is approximately 1.2km north of the nearest turbine.

There are a number of core paths within 5km of the Proposed Development Footprint. These includes a Core Path along the footpath to Libry Moor, to the east of the Proposed Development Footprint. The long-distance route, Southern Upland Way, is approximately 7km to the south east from the Proposed Development Footprint.

The turbines of the consented Sandy Knowe Wind Farm will sit to the east and south of the turbines of the Proposed Development Footprint.

1.3.3 Statutory Designations

There is one environmental designation contained within the Proposed Development Footprint, Polhote and Polneul Burns Site of Special Scientific Interest (SSSI). This earth sciences site is designated for the Upper Carboniferous (Namurian (part)-Westphalian) stratigraphy which provides important information on the early development of the Upper Sanquhar Coalfield.

Within 10 km of the Proposed Development the following designated sites are present:

- Fountainhead SSSI (1.9 km west) – Earth sciences – mineralogy of a disused antimony mine;
- Largrae Burn SSSI (2.5 km north) – Earth sciences – stratigraphy of Upper Carboniferous (Namurian (part)-Westphalian);

- Muirkirk and North Lowther Uplands Special Protection Area (SPA) (4.6 km north) – breeding populations of Hen harrier *Circus cyaneus*, Merlin *Falco columbarius*, Peregrine *Falco peregrinus*, Short-eared owl *Asio flammeus* and Golden plover *Pluvialis apricaria* and non-breeding populations of Hen harrier;
- North Lowther Uplands SSSI (4.6 km north) Biological – designated for breeding populations of Hen harrier and upland breeding bird assemblage;
- Back Wood SSSI (7.4 km east) Biological – Upland oak woodland; and
- Nith Bridge SSSI (9.4 km west) – Earth sciences – Quarternary of Scotland.

Figure 1-3 shows the context of the Proposed Development setting, illustrating environmental designations within 10km.

1.4 The Supplementary Environmental Information Report (SEI Report)

The Supplementary Environmental Information Report provides the further information requested by consultees as detailed in Table 1-1 and in SEI Appendix 1-1. Further amendments to the Proposed Development, to address the questions raised by consultees are also detailed in Table 1-1. Minor amendments to the Proposed Development are detailed within this SEI Report in Chapter 6 Other Considerations, including details of an outdoor education trail and infrared lighting plan.

The assessments and conclusion of the 2022 EIA remain relevant. This SEI does not seek to duplicate or substitute existing documents or text, unless there are identified alterations in the baseline, assessment approach, or assessment outcomes. Therefore, this SEI should be read alongside the 2022 EIA to understand how the projected effects vary from (or remain consistent with) the findings presented in the 2022 EIA.

Table 1-1: Post submission consultation

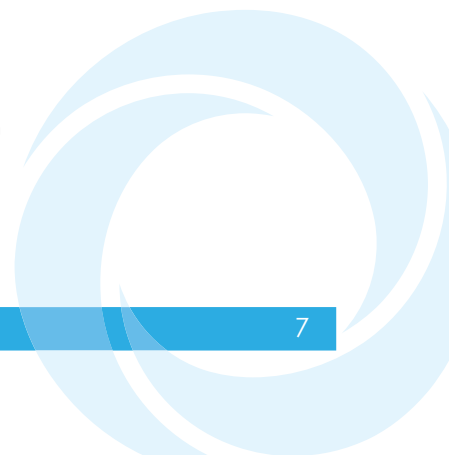
Consultee	Post submission Consultation	Addressed by The Applicant
DGC (Landscape Architect)	<p>Following the consultation response received from DGC on 18/04/2023 (SEI Appendix 1-1) the Applicant engaged in consultation with DGC and the ECU with a meeting held on 30/05/2023.</p> <p>Agreement was reached that the Applicant would provide a set of Landscape Principles for a proposed Landscape Plan including consideration of soft landscaping, footpath links and habitat connectivity providing biodiversity enhancements in line with the Outline Habitat Management Plan (OHMP) submitted with the 2022 EIA (Technical Appendix 14-2 Outline Habitat Management Plan).</p> <p>It was agreed that a requirement for a Landscape Plan, in line with the proposed Landscape Principles, would be the subject of</p>	<p>A set of Landscaping Principles and commitments to biodiversity enhancement are set out in SEI Chapter 5: Landscape Planting Principles and Biodiversity Enhancements in line with the commitments to habitat management stated by the Applicant in the 2022 EIA Volume 2 Technical Appendix 14-2 Outline Habitat Management Plan (OHMP).</p>

Consultee	Post submission Consultation	Addressed by The Applicant
	a planning condition with the finalised layout to be agreed post-consent.	
SEPA	<p>Following the consultation response received from SEPA on 13/10/2022 (SEI Appendix 1-1) wherein a holding objection is stated, the Applicant engaged in consultation with DGC and the ECU with a meeting held on 30/05/2023.</p> <p>In order to address comments raised concerning the proposed method of borrow pit restoration for borrow Pit D (previously opened for the construction of Sandy Knowe Wind Farm under Dumfries and Galloway Council (DGC) (Reference 20/0809/FUL)) it was agreed that the Applicant will provide a Peat Management Plan (PMP) and an Outline Borrow Pit Restoration Plan (OBPRP).</p> <p>Additionally the Applicant noted the request for more ambitious HMP targets and agreed to provide additional detail on biodiversity enhancements in line with the HMP.</p>	<p>The following chapters are provided to address comments raised:</p> <ul style="list-style-type: none"> • SEI Chapter 3: Revised Peat Management Plan (PMP) • SEI Chapter 4: Outline Borrow Pit Restoration Plan (OBPRP). <p>Following changes to the above chapters and volumes of peat associated with the Proposed Development, amendments have also been made to:</p> <ul style="list-style-type: none"> • SEI Appendix 2-1: Carbon Calculator (2023 Update); • SEI Chapter 2: Description of Development (2023 Update). <p>Commitments to biodiversity enhancement are detailed in SEI Chapter 5: Landscape Planting Principles and Biodiversity Enhancements</p>
BT Group	The consultation response received from BT on 22/09/2022 (SEI Appendix 1-1) states an objection due to three turbines (T25, T26 and T28) being within the buffer zone of a planned BT Fixed Link.	The Applicant commissioned Pager Power to engage in consultation with BT and to carry out 3D Fresnel zone calculations to determine if turbines would cause interference to BT's current and presently planned radio network, fixed link 106446/1. Further clarification is provided in SEI Chapter 6 Other Considerations.
NATS Safeguarding	<p>Objection to the Proposed Development due to a predicted Impact on Lowther RADAR.</p> <p>En-route operational assessment of RADAR impact indicates that there will be an "Unacceptable" impact on Prestwick Centre.</p> <p>No impact is anticipated on NATS' navigation aids or NATS' radio communications infrastructure.</p>	A clarification is provided in SEI Chapter 6 Other Considerations.
Glasgow Prestwick Airport Limited	Objection to the Proposed Development until all technical and operational aviation safety matters and mitigations are addressed to the satisfaction of the Airport.	A clarification is provided in SEI Chapter 6 Other Considerations.

Consultee	Post submission Consultation	Addressed by The Applicant
NatureScot	<p>No Objection to the Proposed Development.</p> <p>Recommendations are suggested including:</p> <ul style="list-style-type: none"> • Peatland: Recommend that the Outline Habitat Management Plan is revised with more ambitious targets set. • Birds: Recommend Outline Habitat Management Plan is revised with more ambitious targets set for improving black grouse management. • Bats: Recommend that reduced rotation speed while idling is adopted, as best practice. 	A clarification is provided in SEI Chapter 6 Other Considerations.
RSPB Scotland	<p>No objection to the Proposed Development however clarification sought by the consultee regarding the assessment of status of Black Grouse (coverage and length of surveys leading to underestimation) and potential displacement due to infrastructure layout and locations of turbines 29 and 30 which are located closest to lek sites.</p> <p>RSPB recommendations included:</p> <ul style="list-style-type: none"> • Micro-siting of turbines to prevent displacement being at least 500m from lek sites; • Species management plan for Black grouse requested as a condition of planning consent; • Revision of OHMP to include more ambitious habitat restoration and in part targeted at Black Grouse; • Requested to be given seat on Habitat Management Group if consent is granted; and • Post construction monitoring recommended as a condition for consent. 	A clarification is provided in SEI Chapter 6 Other Considerations.

Consultation responses were also received from the following consultees with no objections or requests for additional information raised:

- Glasgow Airport
- Historic Environment Scotland (HES)
- Ironside Farrar Ltd (commissioned by Energy Consents Unit)
- JRC Windfarm Coordinations
- Kirkconnel and Kelloholm Community Council



- Nith District Salmon Fishery Board
- Royal Burgh of Sanquhar and District Community Council
- Scottish Rights of Way and Access Society (Scotways)
- Scottish Water
- The Coal Authority
- Transport Scotland
- Visit Scotland

1.4.1 Structure of the SEI

The SEI Report is structured around the following chapter headings:

- SEI Chapter 1: Introduction;
 - SEI Appendix 1-1 : Post Submission EIA Consultation Responses
- SEI Chapter 2: Project Description (2023 Update);
 - SEI Appendix 2-1: Carbon Calculator (2023 Update);
- SEI Chapter 3: Revised Peat Management Plan (PMP);
- SEI Chapter 4: Outline Borrow Pit Restoration Plan (OBPRP);
 - SEI Appendix 4-1: Borrow Pit D Additional Information;
- SEI Chapter 5: Landscape Planting Principles and Biodiversity Enhancements; and
- SEI Chapter 6: Other Considerations; and
- SEI Planning Statement (2023 Update).

1.4.2 The SEI Team

The SEI has been prepared by Atmos Consulting with assistance from specialist consultants listed in Table 1-2. All are suitably qualified and competent experts in their field, as is required under the EIA Regulations.

Table 1-2: SEI Team

SEI Subject	Company	Statement of Competency
Ecology Ornithology Carbon Calculator Other Considerations	Atmos Consulting	Atmos has a proven track record in the onshore wind sector built up over 15 years of experience working in the industry and leading EIA projects. All in the team are appropriately qualified and assessments are overseen by experts with at least ten years' experience in their field.
Planning	Hirst Planning Consultants Ltd	With over 19 years' experience in the planning and renewable energy sector, Hirst Planning, provide a robust and in depth knowledge of the legislative requirements required for both local and major planning applications and post consent requirements.
Landscape and Visual	Land Use Consultants (LUC)	LUC has a track record of over 50 years in the planning and environmental sector. They are experienced at undertaking robust and defensible landscape and visual impact assessments, working alongside the development team to embed mitigation into design wherever possible.
Peat	East Point Geo	With over twenty years' experience in understanding ground conditions, East Point Geo provide practical

SEI Subject	Company	Statement of Competency
		application of geology, geophysics, geomorphology, geotechnics and GIS for engineering projects.

1.4.3 Copies of the SEI Report

The SEI Report can also be purchased from the Applicant (telephone: +44 141 212 7222/ email: ukdevelopment@erg.eu), either in digital or hard copy. Charges for copies are:

- £150 for a paper hard copy; or
- £10 for a CD/USB with all documents.

1.5 References

Scottish Government (2017). Environmental Impact Assessment (Scotland) Regulations [Online] 2017 OQPS, Available at: <http://www.legislation.gov.uk/ssi/2017/102/contents/made> [Accessed 14/09/2023]

