

## **Appendix 1.1: Consultation Response Table**



## Appendix 1.1 Consultation Response Table

Table 1.1: Dunside Wind Farm Consultation Response Table

Consultee and Date of Response	Scoping/Other Consultation	Issue Raised	Response/Action Taken
Crown Estate Scotland (CES) 08/04/22	Formal Scoping Consultation	No specific issues with the proposed scope of the EIA however, CES note that impact on fisheries has been scoped out. If the RTC (River Tweed Commission which is also a consultee) have asked that this be changed they would support them in that regard.	RTC comments related to fisheries issues have been addressed in <b>Chapter 6: Ecology</b> .
East Lothian Council (ELC) 08/04/22	Formal Scoping Consultation	The Council notes that assessment of Special Landscape Areas (SLAs) is included and welcome this.	An assessment of effects on the special qualities of designated landscapes (including SLAs) is provided in <b>Table 4.60 to Table 4.63 in Chapter 4: Landscape and Visual Impact Assessment (LVIA)</b> .
		Full information on changes to levels i.e. platforming must be given, to allow assessment of the landscape impact of the proposals. Any levelling out of the site or earthworks to provide platforms could have a significant landscape and visual impact.	An assessment of effects on the site, including consideration of earthworks, is provided in <b>Table 4.9 in Chapter 4</b> .
		Visual assessment should not place reliance on shielding by existing trees unless they are within the Applicants control or are under a Tree Preservation Order.	Consideration was given to felling cycles where forestry is found to screen views. Other areas of woodland or hedgerow planting are assumed to be permanent in <b>Chapter 4</b> . The ZTVs and wirelines assume a bare ground situation so illustrate the 'worst case' scenario.
		Proposed micro siting up to 100 m could change the visibility of the turbines within East Lothian with the potential to create significant effects which may not exist in the layout as proposed. It will be difficult to carry out an assessment of a 'worst case scenario' with this level of flexibility as there are many combinations of potential movements which could alter the arrangement of the turbines in the view.	As set out in <b>Chapter 3: Development Description</b> , the EIA Report considers a micrositing allowance of up to 100 m (see paragraph 3.35 in <b>Chapter 3</b> ). It is anticipated that any turbine micrositing of more than 50 m would require agreement with the Ecological Clerk of Works (ECoW) and written approval of the SBC planning officer. The assessment of effects within this LVIA takes the micrositing allowance into consideration. It is considered that micrositing turbines up to 100 m has the potential to change the composition of the layout in views, at a detailed level, but that there would be no change to the significance of effect as identified in this chapter. The exception to this is the movement of turbines within 1.2 km of residential properties with regard to effects on

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			residential visual amenity (see <b>Table 3.2 in Chapter 3</b> ).
		The Council does not agree to the proposed scoping out of effects on settlements and routes beyond a 20 km radius of the site. East Lothian's main tourist road is the A198 provides panoramic views southwards along the Lammermuirs and should be included in any assessment. The national John Muir Way also follows the coastline to the north and impacts on views from this should be assessed.	The Proposed Development is unlikely to have a significant effect on people in settlements or on roads beyond a 20 km radius. However, the assessment considers effects on the John Muir Way in <b>Table 4.58</b> and the A198 in <b>Table 4.56 of Chapter 4</b> . Viewpoint assessments, with visualisations, are provided for these areas in Volume 3b of the EIA Report, so the likely effects can be understood. In addition, the ZTVs extend to cover these areas.
		The Council supports the inclusion of ancillary development within the assessment and within photomontages up to 5 km. Tracks, masts, substations and other built structures will all add to the development intensity. Full information on lighting on ancillary structures must also be included with any application.	Ancillary development is illustrated on the photomontages for viewpoints within 5 km of the nearest turbine, as shown on <b>Figures 4.2.1 to 4.2.4</b> in Volume 3b of the EIA Report. Turbine lighting is shown on the photomontages in <b>Figures 4.2.3 (g,h), Figures 4.2.7 (e,f) and Figures 4.2.12 (f,g)</b> and wirelines in <b>Figures TA4.3.4 to TA4.3.27</b> in Volume 3b. Further information about turbine lighting is provided in <b>Appendix 4.3: Aviation Lighting Assessment</b> .
		The Council would wish to see numbering of turbines. Landmark high points such as Spartleton and Meikle Says Law should also be included to help inform the viewer of where turbines sit in relation to the landform.	Turbines are numbered on the wirelines in <b>Figures 4.2.1 to 4.2.24</b> in Volume 3b of the EIA Report. Landmarks are marked on a small number of key viewpoints.
		The Council supports the inclusion of the night-time assessment and suggests that consideration be given to the time of these visuals. Consideration should be given to dusk and/or full night. Viewpoint 2 should be included in night time visuals. It is agreed Viewpoint 3 should be included as noted in the Scoping Report.	Night-time photomontages are provided from Viewpoints 3, 7 and 12, as set out in <b>Appendix 4.3</b> .  No further photomontage is provided from Viewpoint 5: Minor road near Wrunk Law (formerly Viewpoint 2) as views from the minor road are represented by Viewpoint 3: Minor road near Wanside Rig junction. In addition, turbine lighting is shown on the wirelines in <b>TA4.3.4 to TA4.3.27</b> in Volume 3b. This enables a full understanding of the likely effects.
		In general the Council agrees with the viewpoints proposed, but would want to agree specific grid references before production of visuals. Seven viewpoints are proposed within East Lothian.	Final viewpoint locations were agreed with ELC on 7 December 2022.  ■ 1. Viewpoint 2 (now LVIA Viewpoint 5: Minor road near

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		<ul style="list-style-type: none"> <li>■ 1. Viewpoint 2 from the minor road to the south of Whiteadder Reservoir may be better relocated to within the Whiteadder valley and Special Landscape Area. At present there is no visibility of even turbine tips from this area. The ZTVs suggest visibility of tips and hubs with this proposal. Sequential views along this road would also be desirable along this road and possible night-time assessment.</li> <li>■ 2. Viewpoint 14 says it is from the Garleton Hills. There is a direct view of the Fallago Rig turbines from the A6137 to the north of Haddington and this may be an appropriate assessment point.</li> <li>■ 3. Viewpoint 15 Tranent is supported as the raised elevation of the town gives wide ranging views along the Lammermuir Hills and gives an alternative view from the northwest towards the site. An appropriate location may be from the junction of the B6355 and B6371 to the southeast of the town.</li> </ul>	<p>Wrunk Law in <b>Table 4.26 in Chapter 4</b>) was retained as it represents local residential receptors and road users. An additional viewpoint (Viewpoint 6: Spartleton Hill in <b>Table 4.27 in Chapter 4</b>) was included to represent views from the Whiteadder SLA.</p> <ul style="list-style-type: none"> <li>■ 2. Viewpoint 14 (now LVIA Viewpoint 17: Barney Hill, Garleton Hills in <b>Table 4.38 in Chapter 4</b>) was relocated to represent the 'worst case' visibility from the Garleton Hills area.</li> <li>■ 3. Viewpoint 15 (now LVIA Viewpoint 20: B6371 in <b>Table 4.41 in Chapter 4</b>) was relocated to the B6355 / B6371 junction as requested.</li> </ul>
		<p>Additional viewpoints:</p> <ul style="list-style-type: none"> <li>■ 1. The A198 at Dirleton representative of users of the coast and the tourist coast road where there are panoramic views to the south of the Lammermuir Hills. Alternatively a viewpoint from within the North Berwick to Seton Sands SLA at Gullane should be considered. This may also be appropriate for night-time assessment, as although just over 25 km from the site it is one of East Lothian's darkest areas with wide ranging views of the hills and sea.</li> <li>■ 2. A viewpoint from within Haddington. This would provide assessment for the impact on residential area and is important as the ZTV indicates visibility of hubs from here at a lower elevation than the hill tops proposed for most viewpoints. Existing views of wind farms are limited from the town along the Lammermuir skyline and any increase to this should be assessed.</li> <li>■ 3. The summit of Spartleton for cumulative and recreational views.</li> </ul>	<p>All suggested viewpoints are included within the assessment.</p> <ul style="list-style-type: none"> <li>■ LVIA Viewpoint 23: A198, Dirleton is assessed in <b>Table 4.44 in Chapter 4</b>. A wireline visualisation is provided in <b>Figure 4.2.23</b> in Volume 3b of the EIA Report.</li> <li>■ LVIA Viewpoint 16: Park Lane, Haddington is assessed in <b>Table 4.37 in Chapter 4</b>. A wireline visualisation is provided in <b>Figure 4.2.16</b> in Volume 3b.</li> <li>■ LVIA Viewpoint 6: Spartleton Hill is assessed in <b>Table 4.27 in Chapter 4</b>. A photomontage is provided in <b>Figure 4.2.6</b> in Volume 3b.</li> </ul>
		<p>Include offshore wind farms and turbines and wind farms in Fife when considering the cumulative impact from North Berwick Law. There is a single turbine at Woodhall which is operational so is in the baseline, however it should be considered for cumulative views.</p>	<p>Turbines within 45 km of the Proposed Development are considered for inclusion in the cumulative assessment, as detailed in <b>Table 4.7 in Chapter 4</b>. Single turbines are considered within 5 km of the Proposed Development. Cumulative</p>

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			wireframes for Viewpoint 22: North Berwick Law include offshore wind farms within 45 km of the viewpoint ( <b>Figure 4.2.22</b> in Volume 3b).
		ELC identifies the Supplementary Planning Guidance on Cultural Heritage and the Built Environment and Special Landscape Area Supplementary Guidance on Historic Landscapes are relevant to the assessment. They note that work being undertaken by the Garden History Society in relation to local designed landscapes was identified as a possible source of baseline information.	The supplementary planning guidance identified by ELC have been taken into consideration in the assessment (refer to <b>Appendix 5.1: Historic Environment Assessment</b> ).  Data received as part of the ELC Historic Environment Record (HER) data (received 26/01/23) identifying local designated landscapes has been reviewed as part of the assessment. No additional non-designated gardens and designed landscapes were scoped into the assessment.
		ELC commented that the outer limit of a 10 km study area is likely to contain most of the assets where significant effects on setting are. Although it is likely that heritage assets closest to the proposal have the greatest potential for effects, there could be effects beyond the 10 km outer study area.  In addition, some historic assets have outlook as part of their essential character. Historic Gardens and Designed Landscapes on the Inventory may have vistas towards the Lammermuirs.	Potential effects resulting from setting change have been considered for designated heritage assets beyond 10 km (the Outer Study Area; refer to <b>Appendix 5.1</b> ). This assessment was informed by the ZTV to identify theoretical visibility. The ZTV along with heritage assets forming the baseline are depicted on <b>Figures 5.1, 5.2 and 5.3</b> in EIA Report Volume 3a.  This included the potential for Inventory-listed gardens and designed landscapes to be affected by the Proposed Development.
		ELC noted that there should be brief consideration as to whether there are assets that could be directly damaged due to turbines breaking or falling over (if turbines are located close to the edge of the site).	As part of the interactive design process consideration has been given to the potential of direct impacts resulting from turbine failure. None of the proposed turbine locations are within 220 m of a designated heritage asset.
		<b>Assessment:</b> The Council is broadly content with the proposed approach. The applicant has identified that there are various Local Biodiversity Sites within the Study Area.	Noted
		<b>Mountain hare:</b> should be included in the species walkover. There is a healthy population in the Lammermuirs and this species are now afforded full protection under Schedule 5 of the Wildlife & Countryside Act 1981, as well as some protection under the Habitats Regulations 1994 (as amended) as a species of Community Interest.	Mountain hare were included within scope of field surveys and have been considered within <b>Chapter 6</b> as appropriate.

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		<p><b>Otter, water vole &amp; great crested newts:</b> The Scoping Report notes that surveys will be carried out for otter and water vole, as well as habitat surveys for great crested newts. However, these are not included in either list at para 6.32 and 6.34 of potential effects scoped in or out. The council assumes that they would be Scoped in if anything is found (along with effects on mountain hare)</p>	<p>These species have been addressed as appropriate within <b>Chapter 6</b>, including commentary on those scoped in or out of the ecological impact assessment.</p>
		<p><b>Habitat Management Plan:</b> If a Habitat Management Plan (HMP) is required to mitigate significant effects, this should be included with the application. Where the HMP is draft, it should be specific enough that it is clear what this mitigation involves and to identify any significant impacts of the HMP itself.</p>	<p>An Outline Restoration and Enhancement Plan (OREP) provides the principles for the habitat mitigation and enhancement measures adopted by the Proposed Development. The OREP is provided in <b>Appendix 6.6</b> and <b>Figure 6.10a and 6.10b</b>.</p>
		<p><b>Baseline data:</b> The Council holds Phase 1 data from 1997 and ecological information from other windfarms in the area which could be used to inform surveys.</p>	<p>LUC requested data from ELC 08.08.22 and received this data (shape files) on 10.08.22. This was used to inform field surveys.</p>
		<p>Previous windfarms development in the area provided some mitigation for black grouse and undertook ornithological monitoring. As far as the council is aware there remains an aspiration to promote recolonisation of the Lammermuirs from the Moorfoots which have a more robust population. Potential for habitat degradation and fragmentation as a result of the wind farm development could further hamper conservation measures therefore consideration should be of the whole population in this area. RSPB/Game and Wildlife Conservancy [Conservation] Trust [GWCT]Lammermuirs Moorland Group would likely have the most up to date records.</p>	<p>GWCT, Lothian and Borders Raptor Study Group (LBRSG), South Scotland Golden Eagle Project (SSGEP) were contacted to request data relating to black grouse, breeding Schedule 1 raptors/owls and golden eagle respectively.</p> <p>Receipt of the email was acknowledged by GWCT but despite a follow up email from the consultants, no further response has been received.</p> <p>The LBRSG informed the consultant that they do not have recent coverage of the Lammermuir Hills area.</p> <p>No response was received from the SSGEP (a follow up email to the original request was sent).</p> <p>No black grouse were recorded during baseline surveys (either during targeted surveys for lekking activity or during any other surveys). Ornithological interests are outlined in <b>Chapter 7</b>.</p>
		<p>ELC note that it would be helpful if the East Lothian/Scottish Borders Council boundary could be shown on mapping so it is clear where a receptor is located.</p>	<p>The Council boundary is shown in <b>Figure 8.1</b>.</p>
		<p>ELC note that the site may be suitable for peatland restoration; if so there could be considerable potential for carbon sequestration here. The</p>	<p>The potential for peatland restoration on the site is discussed in this chapter and <b>Appendix 6.6:</b></p>

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		baseline should include a description of the potential for peatland restoration, if any.	<b>Outline Restoration and Enhancement Plan (OREP).</b>
		ELC note that an area within East Lothian (at Kilpallet) drains towards the site and may contain peat. Changes to one part of a peatland, as well as changes to drainage, can have effects on peat elsewhere. ELC therefore considers that the study area for peat should include land surrounding the site where peat habitat and soil may be connected hydrologically with the site. The potential for impacts of the Proposed Development on peat as a whole, including at Kilpallet, should be considered, not just on the site.	The study area for peat has been extended to include land surrounding the site where peat habitat and soil may be connected hydrologically with the site. This will include the Killpallet area to the north. It is noted that no peat probing or surveys of land outside the site boundary has been undertaken, but the potential for effects on peat as a whole (including the Killpallet area to the north of the site) have been considered in the chapter.
		ELC has a Phase 1 habitat survey from 1997 which may help identify land which is potentially peat on the East Lothian side of the boundary	The Phase 1 habitat survey was obtained from ELC and is referred to in the baseline assessment.
		ELC note that if there are impacts on streams within the SBC area there could be impacts on mobile biodiversity such as otters. ELC therefore supports the proposed mitigation (in the Scoping Report) of a 50m buffer from watercourses to minimise the risk of potential impacts due to changes in runoff, sedimentation or water quality.	Noted. A 50 m buffer from watercourses was included in the early design.
		ELC request that a Peatland Condition Assessment should be prepared in line with NatureScot guidance to evaluate the condition of peat as a precursor to restoration. The Scottish Government has also produced guidance on peat survey and the survey should be carried out in line with this.	Noted, a peatland condition assessment was included in the peat surveys and is reported in <b>Appendix 8.2: Peat Survey Report</b> . Peat surveys were carried out following the Scottish Government guidance <sup>1</sup> .
		<p>“It is recommended by the Scottish Ministers that the final list of receptors in respect of noise assessment should be agreed following discussion between the Company, East Lothian Council and Scottish Borders Council.</p> <p>The noise assessment should be carried out in line with relevant legislation and standards as detailed in chapter 9 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”.</p>	<p>Letter issued to Scottish Borders Council (SBC) and East Lothian Council (ELC) on 27<sup>th</sup> April 2022 outlining the proposed measurement and assessment locations identified within the study area surrounding the Proposed Development. Responses received from both local authorities and agreement reached.</p> <ul style="list-style-type: none"> <li>- ELC agreement on 30/06/2022</li> <li>- SBC agreement on 08/06/2022</li> </ul> <p>Noise assessment methodology in line with ETSU-R-97 Good Practice Guidance presented in</p>

<sup>1</sup> Scottish Government, Scottish Natural Heritage & SEPA (2017) Peatland Survey - Guidance on Developments on Peatland.

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			<b>Appendix 9.1: Noise Assessment.</b>
		The access routes to the site are not within East Lothian so in terms of transport and access the Council would not anticipate any impacts within the ELC area. The Council does not require any additional assessment over and above what is included in the Scoping Report.	Comment noted.
		Windfarms may have effect on microclimate, as they can change the speed of the wind, turbulence and mixing, as well as evapotranspiration. This in turn could affect plant growth, carbon cycling and soil. The EIAR should consider the potential for microclimatic effects and any significant effects consequent on that.	<p>There is currently no evidence to justify inclusion of an assessment of effects on micro-climate within the EIA and no guidance available to inform an assessment of the effects associated with changes to microclimate at operational wind farms. The Site, similar to much of the Lammermuir Hills is managed for grouse shooting which directly influences the flora and fauna present within the Site and this land management will likely outweigh the effect of potential alterations to wind characteristics at ground level on plant assemblages.</p> <p>An OREP (<b>Appendix 6.6</b>) has been proposed that will aim to introduce more diversity and connectivity to the habitats present within the site through moorland re-wetting, replacing muirburn with cutting and substantial riparian tree planting.</p> <p>(See <b>Chapter 6, Chapter 8: Hydrology, Hydrogeology Geology and Peat</b> and <b>Chapter 12: Other Issues</b>).</p>
		<p>The Council agrees that future baseline effects cannot be entirely predicted, however reasonable assumptions can be made, and an assessment of likely effects made. It is not considered appropriate to scope out decommissioning.</p> <p>While the proposal is not in East Lothian and the direct impacts of decommissioning are unlikely to impact East Lothian, there may be indirect impacts from noise, climate emissions and landscape impacts if decommissioning is not achieved. Sufficient information should be given to show that the project is capable of being decommissioned and what the main impacts are.</p>	<p>As noted above, the assessment of effects on climate change considers the positive contribution that the Proposed Development will make to offsetting CO<sub>2</sub> emissions arising from construction and decommissioning once operational.</p> <p>Further details on decommissioning are provided in <b>Chapter 3: Development Description</b>.</p>
		The Council supports the Applicants proposal to carry out a carbon balance assessment for the proposal using Scottish Government guidance .	Noted, the Carbon Balance Assessment is provided in <b>Appendix 12.1</b> .

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		The potential of the land for carbon sequestration through restoration of peatland (as well as what is there just now) should also be considered, as the benefits of this can be considerable. Peatland Condition Assessment should be prepared in line with NatureScot guidance to evaluate the condition of peat as a precursor to restoration.	A peatland condition assessment has been carried out and is detailed in <b>Appendix 6.8</b>
		The EIAR should consider the project in relation to the Scottish Government updated climate change plan Securing a Green Recovery on a Path to Net Zero: Climate Change Plan 2018–2032 Update, which aims to increase renewable energy generation as well as restore 250,000 hectares of degraded peat by 2030. Impacts on circular economy aspirations should also be considered, including through consideration of decommissioning and how it will contribute.	This has been considered in the Planning Statement which accompanies the application.
		The Scoping Report does not appear to give a maximum rotor diameter. Assuming this would be at most 230m (260m to tip, 30 ground clearance), multiplying this by 10 would give a distance of 2.3km where shadow flicker should be considered. The only residential property within this distance is at Kilpallet, which is around 1km from the site boundary. Shadow flicker should be considered for this property if it is within a distance of 10x the proposed rotor diameter.	The candidate turbine has evolved since the Scoping stage and now includes consideration for a turbine with a maximum rotor diameter of 180 m. All properties within 1.8 km of the proposed turbines have been assessed for potential shadow flicker events (see <b>Table 12.8 in Chapter 12</b> ).
East Lothian Council 30/04/22	Post Scoping Consultation	Prior to undertaking the background surveys, a summary of the likely proposed monitoring locations was forwarded to the Environmental Health Department of East Lothian Council (ELC) on 27 <sup>th</sup> April 2022. One of the two proposed survey locations (Killpallet Cottage) was located in the East Lothian Council area.  ELC requested photos of the chosen installation position at the East Lothian receptor.	Proposed methodology and survey location agreed by ELC Environmental Health Officer on 30 <sup>th</sup> June 2022.  Installation location photos were provided to ELC on 10 <sup>th</sup> August 2022 of the logger at Killpallet Cottage and no adverse comments were received.
East Lothian Council, 05/08/22	Post Scoping Consultation / Data Request	ELC provided Phase 1 1997 habitat data for area north of the Site.  ELC confirmed that there are no Private Water Supplies (PWS) within the PWS search area on the ELC register. The PWS search area include the Site and a 1km buffer from the Site boundary.	Data provided by ELC has used to inform baseline assessment in <b>Chapter 6</b> and <b>Chapter 8</b> .
East Lothian Council 21/02/23	Post-Scoping	The updated cumulative list does not include any offshore wind farms as these are all further than 45km from the site. The offshore wind farms are closer to North Berwick Law than to the site, however, and should form part of any assessment from North Berwick Law.	Cumulative wireframes for Viewpoint 22: North Berwick Law include offshore wind farms within 45 km of the viewpoint ( <b>Figure 4.2.22</b> ).
		Viewpoint 3 will give a good impression of night time visibility and impact on East Lothian. We also asked for inclusion of viewpoint 2 from Whiteadder as this is currently dark with no wider visibility out of the valley and no visible turbines at present. The	Night-time photomontages are provided from Viewpoints 3, 7 and 12, as set out in <b>Appendix 4.3 in Chapter 4</b> . In addition, turbine lighting is shown on the wirelines

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		<p>proposals introduce turbines and probably lighting into this view. This has not been included as a night time view. We would want this viewpoint included in night time assessment but maybe not a night time visual. If the lights are shown on the wirelines this will show the visibility of lighting from that and assess the impact without a visual. We presume night time impact will form part of the assessment for each viewpoint whether we have a visual from them or not.</p>	<p>in <b>TA4.3.4 to TA4.3.27</b> in Volume 3b. This enables a full understanding of the likely effects.</p>
<p>East Lothian Council 14/03/23</p>	<p>Gate Check</p>	<p>The council noted that the visual assessment should not place reliance on shielding of existing trees unless they are within the Applicants control or are under a Tree Preservation Order. The developer has responded that areas of woodland and hedges other than forestry planting will be assumed to be permanent. This does not reflect the worst-case scenario, which would be that woodland or hedgerow is removed. Where woodland or hedgerow has a role in shielding views of the proposal, this should therefore be considered in the LVIA.</p> <p>We consider that an allowance of 100 m could change the worst case assessed. This is not desirable, as it would mean that micro-siting effects could potentially result in the need for further application.</p> <p>The council would therefore suggest the lower distance is used unless the applicant, having considered the visual information, is confident that no changes could be made from the layout presented using the 100 m micro-siting allowance which make the impact significantly worse.</p>	<p>The LVIA viewpoints were micro-sited to avoid foreground vegetation and therefore represent the 'worst case' scenario in terms of views from the receptor which they represent.</p> <p>Within the LVIA (<b>Chapter 6</b>), all changes are assumed to be during winter, representing a 'worst case' scenario with minimal screening by vegetation and deciduous trees. Note that wireframes and ZTVs prepared to illustrate potential visual effects are calculated on the basis of bare ground and therefore demonstrate the maximum extent of visibility possible, in the absence of buildings or vegetation. Where forestry is present, consideration is given to felling regimes if levels of screening by forestry are likely to change notably during the lifetime of the Proposed Development.</p> <p>As set out in <b>Chapter 3</b>, the EIA Report considers a micro-siting allowance of up to 100 m (see paragraph 3.35 in <b>Chapter 3</b>). It is anticipated that any turbine micro-siting of more than 50 m would require agreement with the Ecological Clerk of Works (ECoW) and written approval of the SBC planning officer. The assessment of effects within this LVIA takes the micro-siting allowance into consideration. It is considered that micro-siting turbines up to 100 m has the potential to change the composition of the layout in views, at a detailed level, but that there would be no change to the significance of effect as identified in this chapter. The exception to this is the movement of turbines within 1.2 km of residential properties with regard to effects on residential visual amenity (see <b>Table 3.2 in Chapter 3</b>).</p>

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		<p>As noted at Scoping, the Council considers there is potential for significant impacts on settlements and routes beyond 20 km. The Lammermuirs form a backdrop to East Lothian and the proposal is likely to appear on the skyline. The turbines proposed are larger than those currently in the centre of the Lammermuirs at Fallago, and in addition may be lit. The turbines at Fallago may also be removed before this proposal, extending the impact of turbines on the horizon in the central Lammermuirs in time. We would therefore request that the impact on settlements and routes beyond 20 km be included in the assessment.</p>	<p>It is considered unlikely that significant effects could occur on settlements and routes beyond 20 km. The assessment considers effects on the John Muir Way in <b>Table 4.58</b> and the A198 in <b>Table 4.56 in Chapter 4</b>. For other settlements and routes beyond 20 km, reference can be made to the visual assessment for Viewpoint 16: Park Lane, Haddington (<b>Table 4.37 in Chapter 4</b> and <b>Figure 4.2.16</b>), Viewpoint 20: B6371, Tranent (<b>Table 4.41 in Chapter 4</b> and <b>Figure 4.2.20</b>) and Viewpoint 23: A198, Dirleton (<b>Table 4.44</b> and <b>Figure 4.2.23</b>). The ZTVs extend to cover all these areas and reference can also be made to these.</p>
		<p>We asked for inclusion of Viewpoint 2 from Whiteadder in the night-time assessment as this is currently dark with no visibility out of the valley. The proposals introduce turbines and probably lighting into this view. The developer states in the response that the scope of the aviation lighting assessment will be subject of further consultation with ourselves, SBC and NatureScot. This should follow discussions with the CAA, other operators of obstacles and night flying craft, to ascertain what the minimum scheme would be. We would expect Viewpoint 2 to be included in the assessment if lighting is visible from this point. We would prefer that this is included as a night-time visualisation as well.</p>	<p>Night-time photomontages are provided from Viewpoints 3, 7 and 12, as set out in <b>Appendix 4.3</b>. No further photomontage is provided from Viewpoint 5: Minor road near Wrunk Law (formerly Viewpoint 2) as views from the minor road are represented by Viewpoint 3: Minor road near Wanside Rig junction.</p> <p>Ancillary development is illustrated on the photomontages for viewpoints within 5 km of the nearest turbine, as shown on <b>Figures 4.2.1 to 4.2.4</b> in Volume 3b of the EIA Report. Turbine lighting is shown on the photomontages in <b>Figures 4.2.3 (g,h)</b>, <b>Figures 4.2.7 (e,f)</b> and <b>Figures 4.2.12 (f,g)</b> and wirelines in <b>Figures TA4.3.4 to TA4.3.27</b> in Volume 3b. Further information about turbine lighting is provided in <b>Appendix 4.3</b>.</p>
		<p>We note that the final cumulative list is still to be agreed. We are wary of completely ruling out consideration of single turbines beyond 5 km, as if there were to be an application prior to this for a turbine between a viewpoint and the proposal it may require to be considered. We are not aware of any such at the moment however. We would expect that offshore development is considered cumulatively for the North Berwick Law viewpoint.</p>	<p>Developments to be considered in the cumulative assessment were agreed with ELC (email dated 21<sup>st</sup> February 2023).</p> <p>Cumulative wireframes for Viewpoint 22: North Berwick Law include offshore wind farms within 45 km of the viewpoint (<b>Figure 4.2.22</b>).</p>
<p>East Lothian Council 14/03/23</p>	<p>Gatecheck 1 Consultee Responses</p>	<p>ELC requested that a ZTV overlaid with relevant assets be provided. The applicant proposes to supply only the ZTV raster. This makes it difficult to see which assets are affected and we would prefer that they are shown as requested.</p>	<p>The ZTV raster has been supplied to the ELC to enable them to conduct their own analysis of potential impacts.</p>

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			The ZTV for the Proposed Development along with the location of heritage assets forming the baseline is shown on <b>Figures 5.1, 5.2 and 5.3</b> .
East Lothian Council 14/04/23	Gate Check Consultation	ELC note that no probing outwith the site itself is proposed. ELC hope the desk study and probing of the site will allow enough information to be gathered, but if not this might need to be reconsidered.	Noted. The desk study and probing within the Site is considered suitable to assess potential effects on peat outwith the site boundary (i.e. in ELC).
Edinburgh Airport EDI13230 05/04/22	Formal Scoping Consultation	Objection as the site conflicts with the aerodrome safeguarding criteria stating: <i>Instrument Flight Procedure (IFP) Assessment</i>  <i>'No turbine tower of any turbine may be erected, unless and until such time as the Scottish Ministers receive confirmation from the Airport Operator in writing that: (a) an IFP Assessment has demonstrated that an IFP Scheme is not required; or (b) if an IFP Scheme is required such a scheme has been approved by the Airport Operator; and (c) if an IFP Scheme is required the Civil Aviation Authority has evidenced its approval to the Airport Operator of the IFP Scheme (if such approval is required); and (d) if an IFP Scheme is required the scheme is accepted by NATS AIS for implementation through the AIRAC Cycle (or any successor publication) where applicable) and is available for use by aircraft'</i>	The applicant has consulted with Edinburgh Airport and agreed to instruct an IFP Assessment which will be carried out by the airport's Approved Procedure Design Authority (APDO).
Energy Consents Unit (ECU) 01/05/22	Formal Scoping Consultation	It is recommended by the Scottish Ministers that, with regards to impacts of night-time aviation lighting, the Company should discuss and agree with Scottish Borders Council, East Lothian Council and Nature Scot the range (in kilometres from the proposed Development) for night-time assessments of the impacts of night-time aviation lighting and receptors to be assessed. All findings should be provided in the EIA report.	An assessment of night-time effects associated with turbine lighting is provided in <b>Appendix 4.3 in Chapter 4</b> . Night-time visualisations were agreed with ELC <sup>2</sup> .
		As the maximum blade tip height of turbine exceeds 150 m, the LVIA 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.	An assessment of night-time effects associated with turbine lighting is provided in <b>Appendix 4.3 in Chapter 4</b> . Night-time visualisations were agreed with ELC and NatureScot.
		It is recommended by Scottish Ministers that the study area in kilometres from the outer most turbines of the Proposed Development and the final list of viewpoints and visualisations, including those for night-time assessment, should be agreed following discussion between the Company, Scottish Borders Council, Nature Scotland and East Lothian Council.	Study areas, viewpoint locations and visualisation types were agreed with ELC and NatureScot <sup>2</sup> .

<sup>2</sup> No response received from Scottish Borders Council as of 26 May 2023

Consultee and Date of Response	Scoping/Other Consultation	Issue Raised	Response/Action Taken
		Developments to be included in cumulative landscape impact assessments should be discussed and agreed by the Company, East Lothian Council and Scottish Borders Council. Photography and visualisations submitted in the EIA report should reflect the most up-to-date cumulative position and the most up-to-date ecological and vegetation position.	Developments to be considered in the cumulative assessment were agreed with ELC and NatureScot <sup>2</sup> .
	Formal Scoping Consultation (May 2022)	The Scottish Ministers recommend that the Company discuss and agree Baseline Fish Surveys with the local District Salmon Fishery Board and Fisheries Trust.	Habitat loss of water courses and riparian habitat as a result of the Proposed Development is limited as outlined in <b>Chapter 6</b> . Fisheries and freshwater pearl mussel have been scoped out of detailed assessment as effects are not considered likely to be significant on the basis that good practice design considerations have been implemented (e.g. offsetting all infrastructure from watercourses & waterbodies and using existing tracks where possible). In addition, construction methods in the Outline CEMP ( <b>Appendix 3.1</b> ) will include monitoring pre, during and post construction in line with best practice <sup>Error! Bookmark not defined.</sup> , The OREP ( <b>Appendix 6.6</b> ) includes measures to mitigate environmental effects arising as a result of the Proposed Development and to enhance biodiversity across the Study Area. Operational monitoring of water courses will also be implemented. This approach is standard practice on projects of this scale, nature and geographic location.
		Scottish Ministers recommend that the Company contact NatureScot, Scottish Borders and East Lothian Council to discuss and agree designated sites to be included in the EIAR and the survey work and further in-depth modelling and research to be undertaken.	Designated sites included in the assessment were agreed through consultation with all relevant consultees.
		It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds and duration – site specifics and cumulative – should be made following discussion with NatureScot.	Noted.
		Scottish Ministers request that the Company investigates the presence of any private water supplies (PWS) which may be impacted by the development. Details should be provided if any are identified.	SBC and ELC were both contacted and provided PWS data. Potential impacts on PWS are discussed and assessed in <b>Chapter 8</b> .
		Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment	A peat landslide hazard and risk assessment has been included ( <b>Appendix 8.4</b> ), and has been

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		<p>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.</p> <p>The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (2017 Second Edition), should be followed in the preparation of the EIA report.</p>	<p>prepared following the recommended 2017 guidance.</p>
<p>Fisheries Management Scotland (FMS) 15/04/22</p>	<p>Formal Scoping Consultation</p>	<p>The Proposed Development falls within the catchment relating to the River Tweed. It is important that the proposals are conducted in full consultation with the River Tweed Commission and the Tweed Foundation, and FMS would be grateful if they could be involved in the project proposals.</p> <p>Also, 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. They would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the Proposed Development.</p>	<p>LUC scoped detailed surveys for fisheries and freshwater pearl mussel out of the assessment on the basis of good practice design considerations (e.g. offsetting all infrastructure from watercourses &amp; waterbodies). The assessment considered these habitats, taxa and species in line with best practice guidelines and where potential effects were considered to be potentially significant these were subject to detailed impact assessment.</p>
<p>Gifford Community Council 15/04/22</p>	<p>Formal Scoping Consultation</p>	<p>Peatlands, heath and unimproved grasslands are internationally rare complex ecosystems which support very specialised species. It is important to include invertebrate and fungi surveys in the EIA to inform whether the development footprint supports any rare species. It is also vital to carry out follow-up surveys for these groups to record whether the development or any associated interventions have had a negative impact on species diversity. The ecosystem services these taxon groups provide are essential to maintain these as functioning habitats. It would be inappropriate to consider compensation tree planting in this type of ecosystem.</p> <p>A resident in the area is a fungal ecologist and Research Associate, their expertise would be useful to inform the EIA. <b>Error! Hyperlink reference not valid.</b></p>	<p>Noted.</p> <p>Detailed vegetation surveys and desk studies have been undertaken to establish the habitats present within the Study Area (<b>Chapter 6</b>). Where fungi are a component of a habitat of conservation concern, these are considered as appropriate. The OREP has been developed to provide appropriate and proportionate mitigation and enhancement measures in line with current policy and best practice guidelines.</p> <p>Habitat loss as a result of the Proposed Development is minimal. The current land use of the Study Area is likely to reduce the suitability for many invertebrate and fungi species, therefore detailed survey for these taxa was determined to be disproportionate in the context of the scale of the Proposed Development. These taxa were scoped out of detailed survey and assessment as effects are not considered likely to be significant as is standard practice on projects of this scale, nature and geographic location. Good practice design considerations &amp; construction methods will be</p>

Consultee and Date of Response	Scoping/Other Consultation	Issue Raised	Response/Action Taken
			implemented to avoid significant impacts to most invertebrates.
Gifford Community Council 04/08/22	Formal Scoping Consultation	Gifford is the closest significant community north of the proposed wind farm. Designated a Conservation Area, the village has a rich historical heritage, with many significant listed buildings, and is a popular destination for tourists and day visitors. It is appreciated that, compared with locations to the south and east of Dunside, there will not be a great visual impact on the village itself. Nevertheless, it is proposed that an additional viewpoint be considered approximately 1 km north of the centre of Gifford on the B6369. This location, which falls within the ZTV for 5-8 turbine tips, provides a view of the village in its historical context, supporting Yester Estate and lying beneath the Lammermuir Hills.	Gifford was considered for inclusion in the assessment but scoped out due to very limited visibility, as set out in <b>Table 4.5</b> . A wireline from the B6369 north of Gifford is provided in <b>Figure 4.2.25</b> in <b>Volume 3b</b> .
		Since all access to the site is to be from the south, we do not envisage any significant impact on the Gifford area from traffic or transport and have no comments to this section of the report.	Comment noted.
HES 06/04/22	Formal Scoping Consultation	HES noted that the Scoping Report identified that assets beyond 10km should be scoped out of the EIA process. HES did not consider this to be acceptable and advised that the assessment of impacts on setting should focus on ZTV analysis rather than defined search areas, and consideration given to impacts on views of assets beyond the ZTV.	Potential impacts resulting from setting change, have been considered for designated heritage assets beyond 10 km (the Outer Study Area; refer to <b>Appendix 5.1</b> ). This assessment was aided by the ZTV to identify theoretical visibility.  The ZTV for the Proposed Development along with the location of heritage assets forming the baseline is shown on <b>Figures 5.1, 5.2 and 5.3</b> .
		HES offered specific advice on four designated heritage assets: the Mutiny Stones, long cairn 1100m NNW of Byrecleugh (SM361), Dunside Hill, cairn 1225m S of Byrecleugh (SM12507), Byrecleugh, farmstead 1900m WNW of (SM4549) and Byrecleugh, farmstead and cultivation remains 300m SSW of (SM4508)	The design development sought to reduce potential impacts on these heritage assets. Potential impacts were considered for these heritage assets in the assessment. These are reported in <b>Appendix 5.1</b> and <b>Chapter 5: Cultural Heritage</b> .
HES 15/03/23	Gatecheck 1 Consultee Responses	HES confirmed that they were broadly content that the details given reflect HES's involvement with, and advice regarding, the EIA process for the Proposed Development.	Noted.
		HES welcome the clarification that assets outside the 10 km buffer will be considered where long-distance views contribute to cultural significance as part of the EIA assessment.	Noted.
		HES noted that direct impacts to designated heritage assets will be avoided by design, and recommend that direct impacts on the monuments	Direct effects from physical change to heritage assets within the Site have been assessed ( <b>Chapter 5</b> ).

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		<p>within the development boundary are fully assessed in the EIA Report.</p> <p>HES recommend that consideration be given to direct impacts such as vibration and hydrological changes which may result from the proposals even if the construction footprint avoids the scheduled area of designated monuments within the development boundary.</p>	<p>Indirect physical effects (such as vibration and changes to hydrology) were scoped out of the assessment at scoping. <b>Chapter 8: Hydrology, Hydrogeology and Geology (including peat)</b> and <b>Chapter 9: Noise and Vibration</b> of the EIA Report have been reviewed and used to inform the assessment.</p>
<p>Hume and Greenlaw Community Council</p> <p>11/05/22</p>	<p>Feedback at community council meeting</p>	<p>Consideration should be given to potential impacts on Hume Castle.</p>	<p>Hume Castle was considered in the assessment of potential impacts resulting from changes to the castle's setting. These are reported in <b>Appendix 5.1</b>.</p>
<p>John Muir Trust</p> <p>14/04/22</p>	<p>Formal Scoping Consultation</p>	<p>John Muir Trust noted that the proposed site is entirely located within the Lammermuir Hills Special Landscape Area (SLA) and borders the Lammermuir Moorland SLA in East Lothian to the north.</p> <p>No further comments are made at the scoping stage</p>	<p>An assessment of effects on the special qualities of designated landscapes (including SLAs) is provided in <b>Table 4.58 to Table 4.61 in Chapter 4</b>.</p>
<p>Lauderdale Community Council</p> <p>05/04/22</p>	<p>Formal Scoping Consultation</p>	<p>The existing Fallago Rig turbines are visible from several upland areas of Lauderdale. The proposed turbines, at twice the height, will be significantly more so. We believe that they will be visible from walking, cycling and horse-riding routes on minor roads and request that the final submission should include photomontages from around the following points: NT 4942 4591 Lauder Common high point; NT 5331 4282 Jeaniefield; NT 5449 4508 Blainslie-Lauder road; NT 5836 4559 Old Boon.</p>	<p>The requested viewpoints are not included within the assessment due to very limited visibility, and the inclusion of similar viewpoints in more representative locations. Views from the Lauderdale area are represented by LVIA Viewpoint 11: Edgarhope Wood, Southern Upland Way (<b>Table 4.32 in Chapter 4</b>) and Viewpoint 14: B6362 above Lauder (<b>Figure 4.2</b>).</p>
<p>Marine Scotland Science</p> <p>April 2022</p>	<p>Formal Scoping Consultation</p> <p>Standing Advice on freshwater and diadromous fish and fisheries in relation to onshore wind farm developments, updated April 2022</p>	<p>MSS 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.</p>	<p>Habitat loss as a result of the Proposed Development is minimal. Fisheries and freshwater pearl mussel have been scoped out of detailed assessment as effects are not considered likely to be significant on the basis that good practice design considerations have been implemented (e.g. offsetting all infrastructure from watercourses &amp; waterbodies and using existing tracks where possible). In addition, construction methods in the Outline CEMP (<b>Appendix 3.1</b>) will include monitoring pre, during and post construction in line with best practice<sup>Error! Bookmark not defined.</sup>, The OREP (<b>Appendix 6.6</b>) includes measures to mitigate and enhance the Study Area. Operational</p>

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		<p>MSS advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent.</p> <p>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 MSS is consulted on these programmes.</p>	<p>monitoring of watercourses will also be implemented. This approach is standard practice on projects of this scale, nature and geographic location.</p> <p>The Applicant has committed to the appointment of an Ecological Clerk of Works (ECoW). The ECoW role is referenced throughout <b>Chapter 6</b>.</p> <p>The ECoW will oversee the implementation of appropriate fisheries monitoring, which is further detailed in <b>Chapter 6</b>.</p>
<p>Marine Scotland Science (MSS) May 2022</p>	<p>Formal Scoping Consultation</p>	<p>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 Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.</p> <p>Developers will be required to provide a gate check checklist 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.</p> <p><i>"Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:</i></p> <ul style="list-style-type: none"> <li>– any designated area, for which fish is a qualifying feature, within and/or downstream of the Proposed Development area;</li> <li>– the presence of a large density of watercourses;</li> <li>– the presence of large areas of deep peat deposits;</li> <li>– known acidification problems and/or other existing pressures on fish populations in the area; and</li> </ul> <p><i>proposed felling operations</i></p> <p>MSS recommends that a water quality and fish population monitoring programme is carried out to</p>	<p>Habitat loss as a result of the Proposed Development is minimal. Fisheries and freshwater pearl mussel have been scoped out of detailed assessment as effects are not considered likely to be significant on the basis that good practice design considerations have been implemented (e.g. offsetting all infrastructure from watercourses &amp; waterbodies and using existing tracks where possible). In addition, construction methods in the Outline CEMP (<b>Appendix 3.1</b>) will include monitoring pre, during and post construction in line with best practice<sup>Error! Bookmark not defined.</sup>, The OREP (<b>Appendix 6.6</b>) includes measures to mitigate and enhance the Study Area. Operational monitoring of watercourses will also be implemented. This approach is standard practice on projects of this scale, nature and geographic location.</p>

Consultee and Date of Response	Scoping/Other Consultation	Issue Raised	Response/Action Taken
		<p>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.</p>	
		<p><i>"MSS advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent.</i></p> <p><i>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 MSS is consulted on these programmes."</i></p>	<p>The Applicant has committed to the appointment of an Ecological Clerk of Works (ECoW). The ECoW role is referenced throughout <b>Chapter 6</b>.</p> <p>The ECoW will oversee the implementation of appropriate fisheries monitoring, which is further detailed in <b>Chapter 6</b>.</p>
<p>MOD Defence Infrastructure Organisation (DIO) 10054650  08/04/22</p>	<p>Formal Scoping Consultation</p>	<p><i>'The MOD has concerns about the proposed development'</i></p> <p><i>'The turbines will be approximately 71.6km from and detectable by the AD radar at RAF Brizlee Wood'</i></p> <p><i>'As a minimum the MOD would require that the development be fitted with MOD accredited aviation safety lighting in accordance with the Air Navigation Order 2016.'</i></p> <p><i>'At present we are not able to state definitively that we would object, as the MOD can only accurately assess the operational impact of the development at the point in time at which we are consulted on the application by a planning authority.'</i></p>	<p>The MOD will be reconsulted and provided with the details of the Proposed Development and the radar modelling results shown in <b>Table 11.3 in Chapter 11: Aviation</b>. If the MOD determine that an objection based on the potential operational impact is required, the Applicant will enter into discussions relating to technical mitigation options including the same method used to mitigate the adjacent Fallago Rig Wind Farm.</p> <p>In relation to the aviation safety lighting request, all turbines will be fitted with Infra-Red lighting to the MOD specification as detailed in the Aviation Lighting and Mitigation Report (<b>Appendix 11.1</b>). The MOD have already been consulted in relation to the lighting design.</p>
<p>NatureScot 09/05/22</p>	<p>Formal Scoping Consultation</p>	<p>NatureScot advise that consideration should be given to the potential effects of construction, operation and decommissioning of the Proposed Development in relation to the qualifying interests of the River Tweed SAC, including proposed access tracks.</p> <p>It may be helpful to make contact with The Wildlife Information Centre (TWIC) regarding habitat and species information for the site and its immediate surroundings.</p> <p>Please note that the lack of a record does not indicate the absence of a species.</p> <p>The application site is located within 20 km of the following SPAs all designated for non-breeding</p>	<p>The access track was included in field surveys and assessment.</p> <p>Construction operational and decommissioning effects were considered in the assessment.</p> <p>Data provided by TWIC is summarised in <b>Appendix 6.1: Desk Study and Legal Context</b>.</p> <p>A lack of any record(s) is understood not to indicate an absence of a species.</p> <p>Noted.</p>

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		<p>pink-footed geese: Fala Flow SPA, Greenlaw Moor SPA and Firth of Forth SPA.</p> <p>At this distance the SPA geese have the potential to have connectivity with the application site and therefore welcome the proposal to scope the SPA geese into the EIA.</p>	
		<p>While we are satisfied that a single year of vantage point (VP) survey work will be sufficient for this site, NatureScot noted that the current suite of VP surveys have not included September 2021. As September - November is the autumn migration period for geese, advised that the current surveys which were undertaken from October – November, may not provide an accurate representation of pink-footed geese flight activity across the site. As such, advised that the 2022 suite of VP surveys should continue from September – November to account for the missing autumn migration period in 2021. If it is not possible to extend the duration of the VP surveys until November then there may be data available for the autumn migration period for other wind farms in the area which could be used as proxy.</p>	<p>Additional flight activity surveys were undertaken in September, October and November 2022.</p>
		<p>Footnote 44 on P36 of the scoping report states – <i>“It should be noted that survey areas have been created by buffering (as required for the survey type, e.g., 500m for breeding waders) a developable area that was provided by the applicant at the time of the survey (as opposed to the study areas which are buffered from the finalised turbine locations and associated infrastructure at the assessment stage)”</i>. Advise that it would be helpful for a figure to be provided within the EIA report to visually show this difference, if any at application stage. If there is a difference, it should be acknowledged within the assessment along with any impact it may have on the findings of the surveys.</p>	<p><b>Figure 7.1</b> details the survey areas alongside the study areas and any gaps in coverage are detailed in the Limitations and Assumptions section in <b>Chapter 7</b>.</p>
		<p>Due to the VP locations being located within the application site with some being located near to potential turbine locations, it is considered that this may affect bird flight activity across the site during the surveys. In particular there is high potential for the location of VP6 to affect flight activity at T6 and T7. As a result of this, confidence in the VP survey results and collision risk modelling is likely to be reduced.</p>	<p>The selection process for VP locations endeavoured to locate VPs as appropriately as possible taking into account the likely turbine positions and topography of the Site (it should be noted that the Site has some steep valleys/relatively flat-topped hills that limit the options for siting VPs). The aim of flight activity surveys is to collect a representative sample across a suite of locations that cover the Proposed Development area that can then be combined in the collision modelling.</p> <p>Regarding the location of VP 6, it is over 300 m from T6 and over 1 km from T7 and so there is considered to be limited effects to</p>

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			flight behaviour around these turbine locations from the presence of a surveyor at VP 6. Furthermore, it should be noted that bird surveyors endeavour to be as unobtrusive as possible during flight activity surveys (e.g., not moving about during the survey and dressing in muted tones). Ornithology is discussed in full in <b>Chapter 7</b> .
		Confirmed that the IOFs and designated sites proposed for assessment are appropriate.	Noted.
		<p>The River Tweed Special Area of Conservation (SAC) is located within the application boundary and the watercourses within the site have connectivity with the SAC.</p> <p>NatureScot advise that consideration should be given to the potential effects the proposed development in relation to the qualifying interests of the SAC (including proposed access tracks). The SAC interests are sensitive to disturbance to the river habitat, including silt and sediment entering the watercourse and smothering gravel beds, suspended solids in the water column, pollution events, and changes in water quality and in water chemistry.</p>	<p>Noted. The SAC is within and downstream of the Site and is considered a highly sensitive receptor.</p> <p>Potential effects of hydrology and surface water quality are addressed in <b>Chapter 8</b>.</p>
		If the surveys/assessment identify that the proposal may impact nationally important Class 1 and/or Class 2 peatland then we advise that opportunities to mitigate impacts through siting, design and other measures should be fully considered within the EIA report.	Noted, the proposals will not impact nationally important Class 1 and/or Class 2 peatland (see <b>Chapter 6</b> ).
Nature Scot (NS) 09/08/22	Formal Scoping Consultation	<p>NS note that Fallago Rig is located within a natural bowl formed by the landform that accommodates the turbines (48 turbines at 125/110 m to blade tip). The landform helps to reduce adverse effects on the wider landscape and visual resource due to the containment that it provides and the height of the turbines contained therein.</p> <p>This development is proposing the use of 260 m turbines which will be located outside the natural bowl landform, therefore they are likely to be greater than 100 m taller than the operational Fallago Rig turbines. We consider that this would result in a considerable design contrast between the Dunside Wind Farm proposal and the Fallago Rig Wind Farm, with a notable increase in scale in relation to turbine height, turbine spacing, rotor diameter and the resultant requirement for lighting. NS advise that this aspect should be given close attention within the assessment.</p>	The relationship between the Proposed Development and Fallago Rig turbines is considered for all landscape and visual receptors as reported in the assessment tables. Fallago Rig was a key consideration in the design process as described further in <b>Chapter 2: Site Selection and Design Strategy</b> . It is noted that the tip height of the Proposed Development was reduced to 220 m as described in <b>Chapter 3: Development Description</b> .
		NatureScot consider the potential for adverse landscape and visual effects in views of the skyline	Views towards the Lammermuir Hills from East Lothian were a key consideration in the design process as described further in

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		that the Lammermuir hills form, as appreciated from East Lothian, should be a key design consideration.	<b>Chapter 2: Site Selection and Design Strategy.</b> Landscape and visual effects on receptors in East Lothian are considered in the relevant assessment tables in <b>Chapter 4.</b>
NERL TOPA SG33045 Issue 1	Formal Scoping Consultation	NERL have stated that the Proposed Development will have a technical effect on the Great Dun Fell radar which will lead to an unacceptable effect on their operations. There is no effect on any navigation or communications facilities.	The Applicant will be working with NERL to identify a suitable technical mitigation as the basis of a Statement of Common Understanding leading to the imposition of a suitably worded planning condition which will protect NERL operations (See <b>Chapter 11</b> ).
River Tweed Commission 05/04/22	Formal Scoping Consultation	Following construction, there should be 3-5 years post development monitoring, with scope to extend this period if impacts are detected.	This has been included in the Outline CEMP included in <b>Appendix 3.1.</b>
		<i>“RTC does not agree with the assessment method proposed. We note that the scoping document proposes a habitat survey only for fisheries and freshwater pearl mussel. We believe that an electro-fishing survey, data retrieval exercise and culvert survey for any potential obstructions will provide a more informed assessment of fish species presence and potential impacts on local fish populations.  Please refer to full consultation response for commentary re monitoring programme recommendations.”</i>	Habitat loss as a result of the Proposed Development is minimal. Fisheries and freshwater pearl mussel have been scoped out of detailed assessment as effects are not considered likely to be significant on the basis that good practice design considerations have been implemented (e.g. offsetting all infrastructure from watercourses & waterbodies and using existing tracks where possible). In addition, construction methods in the Outline CEMP ( <b>Appendix 3.1</b> ) will include monitoring pre, during and post construction in line with best practice <sup>Error! Bookmark not defined.</sup> , The OREP ( <b>Appendix 6.6</b> ) includes measures to mitigate and enhance the Study Area. Operational monitoring of watercourses will also be implemented. This approach is standard practice on projects of this scale, nature and geographic location.
		The Tweed Foundation closely monitors the health of the fish within the catchment and hold substantive data sets on fish species presence, abundance or absence.	Noted. Deeper peat has been avoided (see <b>Appendix 8.2: Peat Survey Report</b> ) and the comments raised by RTC are covered in <b>Appendix 8.3: Peat Management Plan</b> , and <b>Appendix 8.4: Peat Landslide Hazard and Risk Assessment</b>
		RTC support the detailed survey of peat deposits present within the site to ascertain the risk of peat slide during construction. All construction should avoid areas of deep peat and where this is not possible appropriate mitigation measures should be put in place. Natural peat drainage channels should be preserved throughout the development; excavated material should not be stock piled in areas of unstable peat; concentrated water flows onto peat slopes should also be avoided.	New watercourse crossings were avoided, by using existing tracks where possible. The Proposed

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		<p>least 50m should be established. The potential for sediment transport and deposition should be carefully considered and the installation of appropriate siltation controls should be employed. Where river crossings are proposed SEPA's Engineering in the Water Environment Good Practice Guide should be consulted. The use of 'clear span bridge crossings' is encouraged wherever possible.</p>	<p>Development requires four new watercourse crossings (including two upgraded existing crossings) and 19 existing crossings (<b>Appendix 8.1</b>). Scottish Environment Protection Agency (SEPA) guidance has been followed for crossing design.</p> <p>A 50 m buffer from Ordnance Survey watercourses was included at early design stage.</p>
		<p>RTC note that where water abstraction is proposed, the developer should ensure that they comply with The Salmon (Fish Passes and Screens) (Scotland) Regulation 1994 which states that screens, at the point of water abstraction, should serve to prevent the entry and injury of salmon.</p>	<p>There is no water abstraction proposed for the Proposed Development.</p> <p>The Applicant expects to share the existing water arrangements with Fallago Rig, which have private abstractions (documented in <b>Table 8.5 in Chapter 8</b>).</p>
		<p>RTC note that surface water runoff must be discharged in such a way to minimise the risk of pollution of the water environment. The Water Environment (Controlled Activities) (Scotland) (CAR) Regulations 2011 require any activity that is liable to cause water pollution to be authorised by SEPA. This includes point source pollution and diffuse pollution (fuel, concrete spills, sediment discharge) all of which can be detrimental to the survival of fish. SEPA has produced guidelines for the prevention of pollution.</p>	<p>Noted. SEPA guidance and CAR regulations have been followed and pollution prevention measures and mitigation are discussed in <b>Chapter 8</b>.</p>
		<p>RTC notes that the applicant needs to assess the potential impacts of tree felling on the aquatic environment including nutrient release, increased acidification risk, loss of habitat, impacts on hydrology, increased fine sediment transport and deposition. The Forest and Water Guidelines should be consulted for further information.</p>	<p>There is no tree felling proposed.</p>
<p>Royal Society for the Protection of Birds (RSPB) Scotland 08/04/22</p>	<p>Formal Scoping Consultation</p>	<p>RSPB agree with the methodology and scope of assessment proposed.</p>	<p>Noted.</p>
		<p>RSPB advise that GWCT is contacted for data relating to black grouse, SBC and/or The Wildlife Information Centre [TWIC] is contacted for data on breeding waders, and Wildfowl and Wetlands Trust [WWT] is contacted for data and/or information on migratory routes for designated feature wintering pink-footed geese relating to Fala Flow and Greenlaw Moor SPAs.</p>	<p>GWCT, Lothian and Borders Raptor Study Group (LBRSG), South Scotland Golden Eagle Project (SSGEP) were contacted to request data relating to black grouse, breeding Schedule 1 raptors/owls and golden eagle respectively.</p> <p>Receipt of the email was acknowledged by GWCT but despite a follow up email from the consultants, no further response has been received.</p> <p>The LBRSG informed the consultant that they do not have</p>

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			<p>recent coverage of the Lammermuir Hills area.</p> <p>No response was received from the SSGEP (a follow up email to the original request was sent).</p> <p>No black grouse were recorded during baseline surveys (either during targeted surveys for lekking activity or during any other surveys). Ornithological interests are outlined in <b>Chapter 7</b>.</p>
<p>Scottish Borders Council (SBC) 08/04/22</p>	<p>Formal Scoping Consultation</p>	<p>The EIA is recommended to cover the following points within its detailed section on Transport:</p> <ul style="list-style-type: none"> <li>• Impact on the local road network</li> <li>• Construction traffic type, frequency, numbers etc.</li> <li>• Access routes for general construction traffic</li> <li>• Abnormal loads route and mitigation measures.</li> </ul>	<p>The assessment in <b>Chapter 10: Access, Traffic and Transport</b> has been undertaken in line with these requirements.</p>
		<p>The Land Reform (Scotland) Act 2003 (LRA) introduced a right of responsible public access to most areas of land and inland water in Scotland. This gives everyone a right to take non-motorised access to walk, cycle and horse-ride over most land, by following the Scottish Outdoor Access Code. Rights of Way are specifically protected by law under the Countryside (Scotland) Act 1967 sec. 46. Anyone exercising their access rights must do so responsibly by following the Scottish Outdoor Access Code and land owners/managers have a reciprocal responsibility in respecting the interests of those exercising their rights. Scottish Borders Council (SBC) has a statutory duty to uphold these rights.</p>	<p>Comment noted.</p>
		<p>According to the records held by Scottish Borders Council, the Southern Upland Way (SUW) core path and a number of rights of way lie within this area of land (see the map below). There are also core paths, rights of way and promoted paths in the local area from which the development will be clearly visible.</p>	<p>Comment noted. Consideration to the SUW and other Public Rights of Way have been given within the proposed mitigation section of <b>Chapter 10</b> and will be addressed fully in the Access Management Plan undertaken post consent. An Outline Outdoor Access Management Plan is included at <b>Appendix 3.3</b>.</p>
		<p>Please note that SBC does not have a definitive record of every claimed right of way within its area. The Scottish Rights of Way and Access Society, community councils and local residents may have evidence of existence of claimed rights of way that have not yet been recorded by SBC.</p>	<p>Comment noted and response to ScotWays scoping response is provided in <b>Chapter 10</b>.</p>
		<p>With regards to managing access during and after construction, Developers should follow the guidance set out in the document 'Good Practice during Wind Farm Construction – Part 8 Recreation and Access'.</p>	<p>Comment noted.</p>

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		<p>Wind turbines should be set back at a reasonable distance from rights of way and other potential recreational routes. In their 'Scottish Wind Farm Advice Note', the British Horse Society Scotland recommend a separation distance of four times the overall height should be the target for core paths and National Trails, as these are likely to be used by equestrians unfamiliar with turbines, and a distance of three times overall height from all other routes, including roads to maintain safe access for horses and riders.</p>	<p>Turbine 14 is approximately 855 m distant to the SUW at its closest point to the south of the Site.</p>
<p>SBC 08/04/22</p>	<p>Post Scoping Data Request</p>	<p>SBC provided their PWS Register for the Applicant to review and identify the PWSs accordingly.</p> <p>SBC note that information pertaining to the source locations (grid references) may not be accurate, and the data really only confirms the premises likely to have their sources close by and potentially within the search area. As such, SBC strongly recommend that an approach be made to the premises' owners directly, to confirm the exact locations of their PWS sources. There may also be other premises within the area that SBC do not have recorded on their register but which may be served by PWS, and therefore should be considered accordingly.</p>	<p>The PWS Register was reviewed and used to inform the baseline assessment in <b>Chapter 8</b>.</p> <p>Based on a review of Ordnance Survey maps it is considered unlikely that there are other PWS not captured by the data provided by consultation with SBC, ELC and SEPA.</p>
<p>SBC 08/06/22</p>	<p>Post Scoping Consultation</p>	<p>Prior to undertaking the background surveys, a summary of the likely proposed monitoring locations was forwarded to the Environmental Health Department of SBC on 27<sup>th</sup> April 2022. One of the two proposed survey locations (Byrecleugh Farm) was located in the SBC area.</p> <p>Response from the SBC was received on 8<sup>th</sup> June 2022. Agreement on the proposed survey locations was confirmed and a joint site visit was recommended to seek agreement on precise positioning of the equipment at Byrecleugh Farm.</p> <p>SBC outlined in response that care should be taken to avoid the possibility of elevated background noise levels due to the possible influence of turbine noise from Fallago Rig Wind Farm.</p>	<p>A joint site visit to Byrecleugh Farm with SBC Environmental Health Officer and SBC's appointed noise consultant was undertaken on 17<sup>th</sup> August 2022 and the final survey location at 2 Byrecleugh Farm (the neighbouring property to Byrecleugh Farm) was agreed.</p> <p>Data within wind direction sectors where the two measurement properties lay downwind of the Fallago Rig Wind Farm were excluded from the analysis, to minimise the potential influence from the existing turbines on the noise measurements (see <b>Chapter 9: Noise &amp; Vibration</b>).</p>
<p>SBC 01/05/22</p>	<p>Formal Scoping Consultation</p>	<p>The Ironside Farrar (IF) Landscape Capacity and Cumulative Impact Study is a material planning consideration in the assessment of wind turbine proposals within the Scottish Borders. Any S36 application at Dunside will need to be supported by an EIA that references and assesses the scheme against the new Supplementary Guidance and updated IF Study.</p> <p>The current policy is based on the LCT's of the Borders Landscape Character Assessment (now superseded by NatureScot's Landscape Character Assessment) and assesses the underlying landscape capacity for wind turbines of 120 m high and greater, concluding that there may be limited</p>	<p>The findings of the IF Wind Energy Consultancy Update of Wind Energy Landscape Capacity and Cumulative Impact Study are discussed in paragraphs <b>4.48 to 4.50 in Chapter 4</b>.</p> <p>The landscape assessment is based on the baseline information within NatureScot's Landscape Character Assessment.</p>

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		<p>additional capacity for larger wind turbines within the Lammermuir Hills in association with existing wind farms.</p> <p>As a result of the above, the height of turbines proposed is outside the scope of available guidance and significantly larger than any turbines in consented wind farms in the Scottish Borders to date.</p>	
		<p>An initial study area of 45 km from the outermost turbines in all directions is proposed for the LVIA to identify the relevant landscape and visual receptors, as recommended in current guidance for turbines over 150 m to blade tip. SBC questions whether this is relevant to the size of turbines proposed.</p>	<p>As <b>Chapter 4</b> predicts no significant landscape and visual effects are anticipated beyond 45 km from the Proposed Development, therefore the 45 km study area is considered appropriate.</p>
		<p>A full resolution ZTV to blade tip height with viewpoints with clear demarcation of the SBC/ELC border and clear background mapping should be made available. This information is required to allow the Council to confirm landscape and visual receptors.</p>	<p>A large format ZTV is provided in <b>Figure 4.2.1b</b> (tip height) and <b>Figure 4.2.2b</b> (hub height) in Volume 3b of the EIA Report.</p>
		<p>Siting and design of the wind farm should ensure that the proposal does not dominate the landscape. At design stage, consideration should be given to micro-siting and take account of the screening potential of landform from key viewpoints.</p>	<p>Further detail on the design of the Proposed Development is provided in <b>Chapter 2</b>.</p>
		<p>The disparity of the height of the proposed turbines at 260 m in relation to existing and consented wind farms, particularly Fallago Rig where turbines are less than half the size (up to 150 m in height) of those proposed will be a key consideration. These issues will need to be addressed in the ES and should be demonstrated by photomontage visualisations where relevant.</p>	<p>The relationship between the Proposed Development and Fallago Rig turbines is considered for all landscape and visual receptors as reported in the assessment tables in <b>Chapter 4</b>. Fallago Rig was a key consideration in the design process as described further in <b>Chapter 2</b>. It is noted that the tip height of the Proposed Development was reduced to 220 m as described in <b>Chapter 3</b>.</p>
		<p>A variety of 'coincident' cumulative impacts with adjoining sites within 20 km range could give rise to significant effects and will need to be assessed.</p>	<p>A detailed cumulative assessment is included in the assessment tables. Consideration is given to wind farms at scoping stage within <b>Appendix 4.4: Consideration of Scoping Stage Sites</b>.</p>
		<p>In addition, 'sequential' cumulative impacts may occur throughout the study area and these should be addressed separately in the ES</p>	<p>Sequential cumulative effects for receptors on roads and routes are considered in assessment <b>Table 4.51 to Table 4.59 in Chapter 4</b>.</p>
		<p>The location of the proposed access road raises concerns regarding its position along a series of ROWs leading from the B6456, particularly where it shares a section of the Southern Upland Way, the most important long distant walking route for visitors to the Scottish Borders. The LVIA should</p>	<p>The sections of access road shared with the Southern Upland Way and close to Wedderlie are existing features constructed for Fallago Rig Wind Farm. Effects on the Southern Upland Way are</p>

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		consider the impacts on the adjacent Wedderlie Designed Landscape which borders the proposed access route.	assessed in <b>Table 4.57 in Chapter 4.</b>
		The details of any changes in forest cover and the resulting landscape and visual effects also needs to be taken account of in the landscape and visual impact assessment.	Consideration is given to felling cycles where forestry is found to screen views in the assessment tables in <b>Chapter 4.</b>
		<p>Given the height of the proposed turbines with potential for visual effects at greater distances than previously experienced a few additional VPs would be welcomed to assess the landscape and visual effects on receptors at greater viewing distances than those shown on the ZTVs e.g.</p> <ul style="list-style-type: none"> <li>■ The A6112 a popular tourist route giving access to the north and eastern borders;</li> <li>■ The A697 between Coldstream and Greenlaw an important cross Borders route, sequential effects should be assessed;</li> <li>■ Sequential effects from the B6456;</li> <li>■ Foulden or Paxton representing the eastern Borders;</li> <li>■ Southern Upland Way near Blackburn Rig; and</li> <li>■ Rubers Law, popular for hill walkers at approximately 45 km south.</li> </ul> <p>Some of these should be included in the night-time assessment.</p>	<p>Viewpoints at Foulden / Paxton, on the Southern Upland Way near Blackburn Rig and at Rubers Law were not included in the assessment as no significant effects are anticipated, due to distance.</p> <p>The following viewpoints are considered in the assessment in <b>Chapter 4:</b></p> <ul style="list-style-type: none"> <li>■ Viewpoint 7: B6456, Westruther in <b>Table 4.28 in Chapter 4</b> with photomontage in <b>Figure 4.2.7;</b></li> <li>■ Viewpoint 8: B6456 near Bedshiel in <b>Table 4.29 in Chapter 4</b> with wireline visualisation in <b>Figure 4.2.8;</b></li> <li>■ Viewpoint 18: A6112 near Fawcett Wood in <b>Table 4.39 in Chapter 4</b> with wireline visualisation in <b>Figure 4.2.18;</b> and</li> <li>■ Viewpoint 19: A697 near Coldstream in <b>Table 4.40 in Chapter 4</b> with wireline visualisation in <b>Figure 4.2.19.</b></li> </ul>
		Given the height of the proposed turbines beyond the height of any consented turbines to date in the Scottish Borders, consideration should be given to an increased study area for the visual amenity of residential receptors (RVAA) from 2 km to 3 km or more if significant effects are likely to be experienced.	Within the RVAA in <b>Appendix 4.2</b> , consideration is given to properties within 3 km where wireframes indicate theoretical visibility of the Proposed Development.
		The ZTV Fig 4.1 indicates that there is potential for extensive theoretical visibility right across the Scottish Borders particularly to the south and east. To the north, East Lothian is largely shielded from visibility by the Lammermuir Hills with the exception of the more northerly coastal areas. It is questionable as to whether the receiving landscape will be able to 'absorb' turbines of this height and will be dependent on very careful siting, height adjustment and use of the landform, ridges, hills,	Further detail on the design of the Proposed Development is provided in <b>Chapter 2.</b>

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		valleys and vegetation to limit significant adverse effects on landscape and visual amenity.	
		There is the potential for both direct and indirect impacts to these heritage assets including from setting change to assets outside of the red line boundary. The overall intention for the avoidance of damage to heritage assets is welcomed.	Direct and indirect impacts to heritage assets within the Site and Inner Study Area (5km) and impacts resulting from setting change to designated heritage assets beyond Inner Study Area have been considered in the assessment in <b>Chapter 5</b> .
		The relevant policies for cultural heritage identified in the SBC Local Development Plan and Scottish Planning Policy (SPP) should be considered.	Relevant policies for both the SBC and ELC Local Development Plans were taken into account as part of the assessment (refer to <b>Appendix 5.1</b> ).
		The Scottish Government Remote Sensing Portal and National Library of Scotland, should be used to inform the desk-based assessment.	These sources were examined for additional information to support the desk-based assessment (see <b>Appendix 5.1</b> ).
		SCB Archaeology Service confirmed that they have no objection to the heritage assets that have been proposed as heritage Assets and proposed visualisation locations.	Noted.
		SBC identify that they are largely content with the methodology of the proposed assessment.	Noted.
		Relevant Local Development Plan (LDP) policies are; EP1 International Nature Conservation Sites and Protected Species, EP2 National Nature Conservation and Protected Species and EP3 Local Biodiversity.	<b>Chapter 6</b> has taken into account and references the up-to-date policies.
		A recent Court of Justice of the European Union (CJEU) ruling means that mitigation cannot be taken into account when considering the likely significant effect of a proposal on Natura/European sites and the need for an HRA at the screening stage.	Noted, see <b>Appendix 6.7 Shadow Habitat Regulations Appraisal</b> .
		<p><i>"SBC do not agree with the scope set out.</i></p> <ul style="list-style-type: none"> <li><i>- If the habitat suitability survey for badgers finds evidence of badgers using any part of the site, the subsequent badger survey should cover at least 100m around turbines and other infrastructure and 100m either side of access tracks.</i></li> <li><i>- The potential presence of reptiles should be included as part of the EIA.</i></li> <li><i>- Potential impact on amphibians and invertebrates in and around the site should also be considered.</i></li> <li><i>- Impacts on fish should be considered and assessed within the EIAR as they will be considered as part of an HRA.</i></li> </ul>	<p>A badger survey of the Study Area has been undertaken in line with best practice methods, buffer zones included a minimum of 100 m around turbines and other infrastructure.</p> <p>Reptiles and amphibians were included within the scope of desk and field surveys and have been considered within <b>Chapter 6</b> as appropriate. These species have been scoped out of detailed assessment as effects are not considered likely to be significant, as is standard practice on projects of this scale, nature and</p>

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		<p>- <i>Species and habitats surveys and assessments should consider the Scottish Borders Local Biodiversity Action Plan and Habitat Action Plans.</i>"</p>	<p>geographic location. Good practice design considerations &amp; construction methods will be implemented to safeguard legal compliance.</p> <p>Invertebrates have been scoped out of detailed assessment as effects are not considered likely to be significant, as is standard practice on projects of this scale, nature and geographic location. Habitat loss as a result of the Proposed Development is minimal and the current land use of the Study Area is likely to reduce the suitability for many invertebrate species. Good practice design considerations &amp; construction methods and the OREP(<b>Appendix 6.6</b>) includes measures to mitigate and enhance the Study Area for invertebrates. Operational monitoring of water courses (including fresh water macro-invertebrates) will also be implemented. See notes on fish in response to other consultee comments.</p> <p>Species and habitats have been considered within <b>Chapter 6</b>, with reference made to desk and field surveys, and referenced action plans were required to fully assess impacts.</p>
		<p>The methodology of assessment is acceptable.</p>	<p>Noted</p>
		<p>A full report of the Borders Notable Species and Habitats of Conservation Concern should be obtained from The Wildlife Information Centre (TWIC). Where appropriate, additional survey information and impact assessment will be required for relevant Borders Notable Species and Habitats of Conservation Concern.</p>	<p>Data provided by TWIC is summarised in <b>Appendix 6.1</b>.</p> <p>Moths and butterflies have been scoped out of detailed assessment as effects are not considered likely to be significant, as is standard practice on projects of this scale, nature and geographic location. Habitat loss as a result of the Proposed Development is minimal. The current land use of the Study Area is likely to reduce the suitability for many invertebrate species. Good practice design considerations &amp; construction methods will be implemented to avoid significant impacts to most invertebrates.</p>
		<p>Additional consultees should include Butterfly Conservation Scotland (because of the presence of locally rare moths at the site).</p>	
		<p>SBC agree with the requirement for an extended Phase 1 survey, NVC surveys of habitats of nature conservation and for Ground Water Dependent Terrestrial Ecosystems (GWDTEs). The survey</p>	<p>GWDTE best practice requires a maximum 250 m buffer. This is a standardised methodology with considerable precedent which has</p>

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		should cover the site and 500m from the site boundary.	been used in the assessment in <b>Chapter 6</b> .
		Habitats within and around the site and listed in the Scottish Biodiversity List (SBL) should be considered together with Borders Notable Habitats of Conservation Concern (available from TWIC) and where necessary avoidance and mitigation considered.	Habitats of conservation concern, including those on the SBL and Borders Notable Habitats of Conservation Concern have been considered at design stage and avoided wherever possible. Where not possible, the mitigation hierarchy has been employed and habitats impacted by works have been included in <b>Chapter 6</b> .
		As part of habitat enhancement and mitigation works, there should be scope for habitat improvements around the Dye Water and Watch Water, which have already been identified in the Scoping Report as being in 'poor' and 'bad' condition, respectively.	An OREP is provided in <b>Appendix 6.6</b> . This has been informed by SBC Supplementary Planning Guidance for Biodiversity and the principals of NPF4, Policy 3. The implementation of the OREP will result in no-net-loss of biodiversity and specifically seeks to improve riparian corridors and habitat connectivity of the Watch Water and Dye Water within the Study Area, mitigation and enhancement measures for heath and grassland habitats are also included.
		The outline Habitat Management Plan for the site will address potential impacts from development construction until decommissioning. The HMP should be informed by SBC Supplementary Planning Guidance for Biodiversity.	
		The Council adopts a no-net-loss of biodiversity policy; losses of biodiversity are required to be compensated for and that biodiversity enhancements provided. Compensation and enhancement should be secured through a Habitat Management Plan in accordance with good practice	
		There are opportunities to enhance the local habitat network including the woodland (including riparian habitat) and moorland habitats including wetland habitat network (including blanket bog habitat) and grassland habitat.	
		Potential noise disturbance of breeding moorland birds during the operational phase should be considered within the EIAR.	
		Consideration should also be given to the ongoing re-establishment of Golden Eagles in the region (SSGEP). It is likely that released birds could occupy former home ranges and young birds are now foraging and commuting to certain areas within Scottish Borders. Further information may be available from the project team: <a href="https://www.goldeneaglessouthhofscotland.co.uk/">https://www.goldeneaglessouthhofscotland.co.uk/</a>	
		It would be preferable if black grouse and raptor surveys were carried out for another season. Bird numbers can vary considerably from year to year and the currently available data from one breeding season seems insufficient.	Scarce breeding bird surveys were undertaken during the 2021 and 2022 breeding seasons.  Black grouse surveys were undertaken during the 2022 breeding season (see <b>Chapter 7</b> )
		SBC recommend that LBRSG is consulted for records of Schedule 1 raptors. Any sensitive	LBRSG was contacted to request information. A summary is

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		<p>information on protected species should be contained within a confidential annex.</p> <p>SBC note that flood risk is manageable given the size of the site and they would have no objection to this proposal in terms of flood risk. However, SBC would require that the following is adhered to;</p> <ul style="list-style-type: none"> <li>• The formation of any newly formed hard surfaces such as access roads should be attenuated to at least existing Greenfield runoff rates so that there is no increased effect on downstream receptors. Likewise, any discharges from SuDS and other drainage should be kept to existing Greenfield runoff rates.</li> <li>• If there are to be any culverts, watercourse crossings or alterations to crossings, these must not reduce the flow conveyance of the watercourse.</li> <li>• Details of the silt traps and any other functions that the applicant proposes to minimise the amount of sediment entering the watercourse should be submitted.</li> <li>• A buffer zone between the watercourse and infrastructure (e.g. turbines).</li> </ul> <p>SBC note that the Scoping Report states that there will be a 50m buffer zone between turbines and watercourses to reduce impacts on runoff and water quality. It is also stated that all components of the development, and watercourse crossings will be kept outwith the 1 in 200 year SEPA fluvial flood extents. SBC agree that these are appropriate steps to mitigate flood risk and I would encourage these to be incorporated within the full application.</p> <p>The development's compatibility with current guidance, which normally refers to a 10x rotor diameter range should be considered. The Council SG also requests assessment for residential properties within 2 km of each turbine. Any residential properties within this distance should still be assessed for shadow flicker.</p>	<p>provided in the baseline section of <b>Chapter 7</b> for relevant species and detail is contained in <b>Confidential Appendix 7.2</b>.</p> <p>Noted.</p> <p>The drainage design, including SuDS, has been designed to attenuate flows to Greenfield runoff rates.</p> <p>New watercourse crossings have been designed to maintain the flow conveyance of the watercourse.</p> <p>Construction SuDS, including silt traps, are described in the CEMP and mitigation sections within <b>Chapter 8</b>.</p> <p>A minimum 50 m buffer has been applied to all watercourses and there is no infrastructure within flood risk areas. There are two locations where the 50 m buffer could not be achieved, these are detailed and assessed in <b>Appendix 8.1: Watercourse crossings</b>.</p> <p>Flood risk is discussed in the baseline assessment within <b>Chapter 8</b>.</p> <p>The candidate turbine has evolved since the Scoping stage and now includes consideration for a turbine with a maximum rotor diameter of 180 m. All properties within 1.8 km of the proposed turbines have been assessed for potential shadow flicker events (see <b>Table 12.8 in Chapter 12</b>).</p>
SBC Archaeology Service 05/08/22	Meeting to discuss the Proposed Development	SBC highlighted the potential for previous unrecorded cairns on hilltops within the Site, prehistoric features around the burns within the steep slopes, burnt mounds, features relating to mining/extraction and further historic routes similar to the Herring Roads.	Noted and considered as part of the baseline data gathering and assessment of the potential for previously unrecorded heritage assets within the Site in <b>Chapter 5</b> (Refer to <b>Appendix 5.1</b> ).
Scottish Water 25/03/22	Formal Scoping Consultation	Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced.	Noted. The Proposed Development does not require to be serviced by Scottish Water.

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		<p>Scottish Water indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. The abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Dye Water supplies Rawburn Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. The proposed activity is a sufficient distance from the intake, however there is likely to be some risk and care should be taken and water quality protection measures must be implemented.</p> <p>In the event of an incident occurring that could affect Scottish Water we should be notified immediately.</p> <p>The fact that this area is located within a drinking water catchment should be noted in documentation. Also anyone working on site should be made aware of this during site inductions and we would also like to take the opportunity, to request that in advance of any works commencing on site, Scottish Water is notified at <a href="mailto:protectedwsources@scottishwater.co.uk">protectedwsources@scottishwater.co.uk</a> so we can make our operational teams aware there will be activity taking place in the catchment.</p>	<p>This will be included in the baseline assessment in <b>Chapter 8</b>. The Rawburn WTW is approximately 3.7 km downstream of the Site in the Watch Water catchment.</p> <p>Water quality and pollution prevention measures are proposed to account for the sensitive receptor.</p> <p>Scottish Water will be kept informed should any incidents occur; this and the fact that the Site is in a drinking water catchment is documented in <b>Appendix 3.1: Construction Environmental Management Plan (CEMP)</b></p>
		<p>Scottish Water wish to be further notified as the application progresses and to have the grid reference of each of the 20 turbine locations and access tracks.</p>	<p>Grid references of the turbine locations were provided to Scottish Water on 16<sup>th</sup> August 2022.</p>
		<p>Scottish Water will not accept any surface water connections into our combined sewer system.</p>	<p>No connections into the Scottish Water system are proposed.</p>
		<p>Scottish Water note that all proposed developments require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted.</p>	<p>The Proposed Development does not need a water or waste water connection. On this basis, a PDE Form is not required to be submitted.</p>
		<p>Scottish Water note that certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968.</p>	<p>Noted, however it is understood that there will be no wastewater or trade effluent generated during operation of the wind farm. Wastewater generated during construction (e.g. construction staff welfare arrangements) will be taken off site.</p>
<p>Scottish Water 17/08/22</p>	<p>Post Scoping Consultation</p>	<p>The Applicant provided grid references of proposed turbines. Scottish Water confirmed by return email that there are no SW assets near these areas. However, Scottish Water recommend that the Applicant purchases their asset plans from Site Investigation Services (UK) Ltd to make sure.</p>	<p>Scottish Water asset plans covering the Site and surrounds were purchased and used to inform the baseline assessment in <b>Chapter 8</b>.</p> <p>Comment noted and those applicable paths have been included within the assessment</p>
<p>ScotWays</p>		<p>The enclosed map shows that rights of way BB103, BB104, BB106, BB108-113, BB118, BB140, BB143</p>	

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27/04/22	Formal Scoping Consultation	and LE207as recorded in the National Catalogue of Rights of Way (CROW) cross or are close to the application site as shown on Figure 1.1 Site Location.	and where necessary mitigation measures proposed. An Outline Outdoor Access Management Plan is included at <b>Appendix 3.3</b> .
		The enclosed map shows other path BB196 as recorded in the National Catalogue of Rights of Way (CROW) crosses or is close to the application site as shown on Figure 1.1 Site Location.	Comment noted and those applicable paths have been included within the assessment and where necessary mitigation measures proposed.
		The enclosed map shows the Heritage Paths project promotes a route, Herring Road [HP01],for its historic interest. This old route crosses or is close to the application site as shown on Figure 1.1 Site Location.	Comment noted and those applicable paths have been included within the assessment and where necessary mitigation measures proposed.
		The enclosed map shows that our book Scottish Hill Tracks describes routes number32 Dunbar to Lauder "The Herring Road' [HT525], 34 Garvald to Westruther[HT712] and 35 Cranshaws to Longformacus and Westruther [HT731/HT720] which cross or are close to the application site as shown on Figure 1.1 Site Location.	Comment noted and those applicable paths have been included within the assessment and where necessary mitigation measures proposed.
		In this case as rights of way BB103, BB104, BB106, BB110, BB111, BB140 and BB143 are recorded as equestrian rights of way we strongly recommend consulting the British Horse Society Scotland as their guidance regarding separation distance may differ from that set out above.	Comment noted, consultation with the BHS has taken place and mitigation measures proposed in <b>Chapter 10</b> .
		It is advisable to set back all wind turbines a minimum distance, equivalent to the height of the blade tip, from the edge of any public highway (road or other public right of way) or railway line.	BB/BB108/1 cuts through the proposed temporary hardstanding and access track to Turbine 15. Turbine 15 is approximately 145 m away from the PRoW.
		Under section 3 of the Land Reform (Scotland) Act 2003, there is a duty upon landowners to use and manage land responsibly in a way which respects public access rights. Under section 14 of the same Act, access authorities have a duty to uphold access rights. Accordingly, we suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.	Comment noted. An Outline Outdoor Access Management Plan is included at <b>Appendix 3.3</b> . A finalised OAMP will be discussed and agreed with the Council access officer prior to commencement of development.
SEPA 11/04/22	Formal Scoping Consultation	SEPA consider that the following key issues must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection, the information outlined below (and detailed further in the appendix of the response from SEPA) must be submitted in support of the application:	The information requested is provided in the EIA Reprot, as described below (with justification for any exclusions at this stage):
		a) Map and assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications.	a) A map of all engineering activities is provided in <b>Figure 8.1</b> . The map shows all water environment features and proposed buffers.

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			A flood risk assessment was not required for the Proposed Development; however, flood risk is described in the baseline and assessment in <b>Chapter 8</b> . CAR requirements are also covered in the assessment in <b>Chapter 8</b> .
		b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.	b) A map and assessment of impacts upon GWDTE and buffers are included in <b>Figure 8.3</b> discussed in the effects assessment in <b>Chapter 8</b> .
		c) Map and assessment of impacts upon groundwater abstractions and buffers.	c) A map and assessment of impacts upon groundwater abstractions and buffers are included in <b>Figure 8.3</b> discussed in the effects assessment in <b>Chapter 8</b> .
		d) Peat depth survey and table detailing re-use proposals.	d) A peat depth survey is provided in <b>Appendix 8.2</b> and reuse proposals described in <b>Appendix 8.3</b> .
		e) Map and table detailing forest removal.	e) There is no forest removal required for the Proposed Development.
		f) Map and site layout of borrow pits.	f) Borrow pits are shown in <b>Figures 8.1, 8.2 and 8.3</b> .
		g) Schedule of mitigation including pollution prevention measures.	g) Pollution prevention measures are described in the Mitigation section within in <b>Chapter 8</b> and summarised in the Schedule of Mitigation ( <b>Appendix 3.4</b> )
		h) Borrow Pit Site Management Plan of pollution prevention measures.	h) A Borrow Pit Site Management Plan will support the Construction Environmental Management Plan (CEMP). An outline CEMP is provided in <b>Appendix 3.1</b> with regards to pollution prevention measures.
		i) Map of proposed waste water drainage layout.	i) The Proposed Development will not generate waste water and therefore no waste water layout is provided.
		j) Map of proposed surface water drainage layout.	j) An outline surface water drainage layout is provided in <b>Appendix 8.5: Outline Drainage Strategy</b> .
		k) Map of proposed water abstractions including details of the proposed operating regime.	k) There is no water abstraction proposed for the Proposed Development.  The Applicant expects to share the existing water arrangements with

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			Fallago Rig, which has private abstractions (documented in <b>Table 8.5</b> in <b>Chapter 8</b> ).
		l) Decommissioning statement.	l) Decommissioning is discussed in <b>Chapter 3: Development Description</b> . A decommissioning strategy will be submitted by the Applicant to SBC for agreement prior to the decommissioning works taking place, and this is likely to form a condition to the consent.
		SEPA agrees with the proposed peat probing methodology, however SEPA finds it disappointing that peat probing was not carried out at Scoping stage. SEPA strongly encourage the Applicant to conduct Phase 1 probing at an early stage and to share this with SEPA so that further advice can be provided about how the layout can be designed to minimise impacts. More probing will be required in areas of deep peat, so that the data can be used to move infrastructure to shallower peat areas.	Phase 1 peat survey was carried out in March 2022. The Phase 1 Peat Survey report was submitted to SEPA on 3 <sup>rd</sup> August 2022. The data was used to inform the design to avoid deeper peat.
		SEPA are satisfied with the proposed approach to mitigation as long as this commitment is conveyed to construction staff as a priority to protect the water quality in the upper Tweed catchment.	Noted. This will be conveyed to the contractor and construction staff via the CEMP (provided in outline in <b>Appendix 3.1</b> ) and Schedule of Mitigation ( <b>Appendix 3.5</b> ).
		SEPA welcome the commitment to include a 50 m buffer around all watercourses which form part of River Tweed SAC. We note that “where possible” a 50 m buffer between turbines and watercourses/bodies shown on 1:50,000 scale will also be included. We would highlight that we would expect to see a 50 m buffer applied to all watercourses, not just those on the 1:50k map.  If a minimum buffer of 50 m cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.	A 50 m buffer was applied to all watercourses, including those identified in the field. Locations where the 50 m water feature buffer is encroached are identified and justified in <b>Appendix 8.1</b> . Site specific additional mitigation, if required, is outlined in the appendix and also in the Schedule of Mitigation ( <b>Appendix 3.5</b> ).
		SEPA recommend that all small-scale watercourse crossings should be designed as oversized bottomless arched culverts or traditional style bridges. In the case of larger scale watercourse crossings, including any crossings of the Dye Water, a single span bridge is preferred.	Noted and has fed into the design of the Proposed Development and EIA Report.  There are no proposed new crossings on larger watercourses such as the Dye Water.
		SEPA note the following Regulatory Requirements: <ul style="list-style-type: none"> <li>Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended).</li> </ul>	Engineering in the water environment has been minimised. <b>Appendix 8.1</b> and <b>Figure 8.1</b> provides information on new and existing watercourse crossings and comments on the level of CAR authorisation required.

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		<ul style="list-style-type: none"> <li>• Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011.</li> <li>• Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.</li> </ul> <p>Consider if other environmental licences may be required for any installations or processes.</p>	<p>A Peat Management Plan (<b>Appendix 8.3</b>) has been prepared which identifies the volumes of peat to be excavated in association with proposed infrastructure and which provides suitable reuse recommendations and mitigation measures.</p> <p>Relevant permits for the proposed crushing or screening (at the borrow pits) will be sought when required.</p> <p>A CAR construction site licence will be required for the Proposed Development. This will be applied for in advance of construction in line with SEPA's Sector Specific Guidance: Construction Sites (WAT-SG-75).</p>
SEPA 17/08/22	Post Scoping Consultation	<p>SEPA welcomed the Phase 1 peat report, which was issued to SEPA on 3 August 2022. SEPA requested a detailed map of peat depths, with individual probing points shown (not only interpolated) and all infrastructure overlain to show how peat depth has informed layout.</p> <p>SEPA note that peat deeper than 1m is classed as deep peat and all peat over this depth must be avoided where possible. Applicants must investigate minimising excavation through micro-siting the infrastructure off deep peat, the use of floating tracks and temporary geotextile surfaces for blade storage etc. to reduce the total amount of peat excavated. Where this cannot be achieved, turbines should be removed from the plan unless sufficient justification can be provided.</p>	<p><b>Figures 2a-d in Appendix 8.2</b> show the infrastructure with peat depths on top. The figures use a suitable scale to clearly illustrate the probed depth category.</p> <p>Deeper peat was avoided where possible, based on feedback from the Phase 1 peat survey. The PMP (<b>Appendix 8.3</b>) describes how excavation is minimised and other mitigation used (e.g. floating tracks).</p>
SEPA 16/01/23	Post Scoping Consultation/ Data Request	SEPA provided data of eight CAR abstraction licences within a 7km radius from the Site Centre.	The data has been used to inform the baseline and assessment on groundwater abstractions in <b>Chapter 8</b> .
SEPA 02/03/23	Gate Check Consultation	<p>SEPA note that no information was provided regarding underpinning site surveys, site constraints and intended buffers zones from sensitive receptors so they cannot offer any comments on the appropriateness of the site design at this stage.</p> <p>SEPA are happy to be reconsulted if this is provided. Otherwise SEPA will consider their position during the formal consultation process. SEPA advise to see their Scoping Response for issues to be addressed.</p>	Site surveys, constraints and buffer zones are provided in the <b>Figures 8.1 to 8.7</b> . The issues raised in the Scoping response have been addressed where possible. Locations where SEPA's recommended buffers are encroached are identified and justified in <b>Chapter 8</b> and <b>Appendix 8.1</b> .
The British Horse Society	Formal Scoping Consultation	Under the Land Reform (Scotland) Act 2003, horse-riders and carriage drivers enjoy a right of access to most land in Scotland, provided that they behave responsibly. Land managers in turn are obliged to	Comment Noted. Mitigation measures proposed for horse riding will be considered as part of the Access Management Plan. An

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23/03/22		respect equestrian access rights and take proper account of the right of responsible access in managing their land.	outline of the anticipated mitigation measures is provided in the Mitigation section of <b>Chapter 10</b> . An Outline Outdoor Access Management Plan is included at <b>Appendix 3.3</b> .
Transport Scotland (TS) 11/04/22	Formal Scoping Consultation	TS note from the Scoping Report (SR) that the Transport & Access EIAR Chapter will be supported by a Transport Assessment report and Abnormal Load Route Survey. We note that the thresholds as indicated within the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic are to be used as a screening process for the assessment.	Noted. The assessment has been undertaken as per the IEMA Guidelines.
		TS note from the SR that a peak construction period assessment will be undertaken, with a review of the maximum impact assessment of the effects of construction traffic on both the local and trunk road networks. We note that the study area will comprise the A68(T) between the A720(T) and Lauder, in addition to local roads. Transport Scotland is satisfied with the proposed study area.	Noted. The assessment is undertaken in the Construction Effects section of <b>Chapter 10</b> .
		The SR also indicates that potential trunk road related environmental impacts such as driver delay, pedestrian amenity, severance, safety etc will be considered and assessed where the IEMA Guidelines for further detailed assessment are breached. These specify that road links should be taken forward for further detailed assessment if: <ul style="list-style-type: none"> <li>• Traffic flows will increase by more than 30%, or</li> <li>• The number of HGVs will increase by more than 30%, or</li> <li>• Traffic flows will increase by 10% or more in sensitive areas.</li> </ul>	Noted. The assessment has been undertaken as per the IEMA Guidelines.
		We note that existing traffic count data will be extracted from the Department for Transport (DfT) database for the A68(T), with National Road Traffic Forecasts (NRTF) Low Growth being applied. Transport Scotland is satisfied with the application of growth but would ask that the A68 data is sourced directly from Transport Scotland.	Comment noted, all data for the trunk road network has been sourced from the Transport Scotland database, while the local road network has been sourced from the DfT database. Traffic data for the year 2019 has been used from both sources, to enable traffic flows to be used that would be unaffected by Covid-related travel restrictions or factors that are continuing to have implications on traffic volumes.
		It is noted that any impacts associated with both the operational and decommissioning phases of the development are to be scoped out of the EIA. We would consider this to be acceptable in this instance.	Comment noted.
		The potential requirement for alterations to the existing Fallago Rig Wind Farm access route to	Comment noted. A detailed Route Survey Report is included as

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		<p>accommodate larger turbine components, including any works required to the public highway or land required to facilitate access, will be investigated as part of the EIA. Transport Scotland is satisfied with this approach but would add that the Abnormal Loads Assessment report should identify key pinch points on the trunk road network and that swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.</p>	<p>Appendix A in <b>Appendix 10.1 Transport Assessment</b>.</p>
		<p>It should also be noted that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager(s) prior to the movement of any abnormal load.</p>	<p>Comment noted.</p>