Jane Brooks-Burnet
Stirling Council
Teith House
Kerse Road
Stirling FK7 7QA

Our ref: 40419

Your ref: 24/00494/FUL

CBC House
24 Canning Street
Edinburgh
EH3 8EG

T: 0131 346 9100
E: edinburgh@atmosconsulting.com
www.atmosconsulting.com

28/11/2025

Dear Jane

Drummarnock Wind Farm - SEPA Response

I refer to the email dated 10 September 2024 from the Scottish Environment Protection Agency (SEPA) to Stirling Council in response to the consultation on the application for Planning Permission for the proposed Drummarnock Wind Farm (Reference 24/00494/FUL, the 'Proposed Development').

Having considered the issues raised the Applicant wishes to make the following representation.

We note that SEPA have submitted a holding objection on the grounds of a; "*lack of information in relation to Groundwater Dependent Terrestrial Ecosystems (GWDTE)".* The Applicant infers that the other points raised in their response are for advice only and not the subject of the objection.

Ecology and Peat

Borrow Pit Relocation

In their response SEPA states:

> *"We previously requested that one of the proposed borrow pits be relocated due to the presence of M6 habitat (a Groundwater Dependent Terrestrial Ecosystem – GWDTE)…" "The majority of the habitat here was MG10a therefore restoration of this borrow pit with the excess peat may not tie in with the surrounding vegetation questioning whether this would be for disposal of waste rather than ecological benefit and therefore may require a Waste Management Licence"*

and requested:

> *"…that borrow pit BP01 be relocated due to the presence of GWDTE unless it can be shown that these are not groundwater dependent."*

For the avoidance of doubt, no disposal or other activities that might require a Waste Management Licence will be undertaken on Site as part of the Proposed Development. The use of peat for reinstatement and habitat restoration will be undertaken in accordance with the Peat Management Plan (PMP) and the Habitat Management Plan (HMP).

In response to these concerns the Applicant has conducted a review of the borrow pit requirements of the Proposed Development and proposes to remove BP01 entirely and to alter the dimensions of BP02, 03 and 04. There will be no impact on moderate or highly dependent GWDTE as a result of the alteration of the dimensions of these borrow pits. Full details are included in the Additional Information (AI) Report.

Groundwater Dependent Terrestrial Ecosystem

In their response, SEPA has requested clarification on: *"….where the M9 habitat was as it was not included in the assessed GWDTEs".*

It should be noted that M9 Carex rostrata – Calliergon cuspidatum/giganteum mire was initially excluded from the EIA because it was considered outside the Proposed Development Site +250 m and therefore not within the Proposed Development's Zone of Influence (ZoI).

The M9 is a very small area (30 m x 2 m) located within M35 Ranunculus omiophyllus – Montia fontana rill east of watercourse crossing 4, which itself is only 100 m x 10 m at most. The M9 lies approximately 40 m north of the proposed track, with M35 situated 20–50 m from the same track.

Although SEPA (2017) guidance at the time considered both M9 and M35 as potentially highly groundwater dependent communities, a hydrological risk assessment carried out by the independent project hydrologist as detailed within the 2024 EIA Report concluded there is little hydrological continuity between the track and M35, and that a connection between the M9 and the track is unlikely.

The EIA determined no significant effects on M35/ M9, relying on a 50 m micro-siting allowance to move the track further from it, ensuring a minimum separation distance of 70 m (and up to 100 m). Given its proximity and the hydrological assessment, no significant effects are expected on either M9 or M35.

Nevertheless, due to the sensitivity of these habitats and the presence of the nationally scarce moss *Hamatocaulis vernicosus* within M35, mitigation measures will be implemented. These include double silt-fencing around the works area and fencing clearly marking the sensitive habitats. The area will be closely monitored by the ECoW during fencing installation and throughout construction, as detailed in Technical Appendix 15-1 Outline Construction Environmental Management Plan of the 2024 EIA Report.

Although M9 is very small and difficult to observe on the Additional Information Figures 8-4 NVC and 8-5b Assessed GWDTE, its location is described with guidance for identification within the Additional Information Report in Section 5.2.1. As M9 is associated with a small area of M35, it will be incorporated within the M35 mitigation measures already explicitly approved by SEPA.

Location of Turbine T3

SEPA has advised that: "*Should there be no constraints, we would ask whether turbine 3 could be relocated to the opposite site of the track where there appears to be less peat".*

The Applicant has carefully considered the location of Turbine 3 (T3) through a detailed constraints analysis. Turbine 3 is currently located on peat between 0.5–1 m depth, with most infrastructure on the southern side of the track and the blade/nacelle storage area on the northern side.

The location of Turbine 3 has been carefully sited to minimise environmental impacts upon many factors including landscape and visual, cultural heritage, potential encroachment towards watercourses, peat and highly dependent GWDTE's. Turbine 3 has also been sited carefully to avoid infrastructure in the form of the point-to-point fixed telecommunications link to the southwest (Ref. 1082233/2),. Further detail can be found within the 2024 EIA Report and changes to the design are highlighted within the Additional Information Report.

These constraints are illustrated in Figure 1-5: T3 Constraints (Appendix A).

Relocating the turbine north to the other side of the track would encroach upon a 50 m watercourse buffer and cause direct and indirect loss of highly dependent M6d GWDTE habitat in the elongated valley bottom to the north. Moving northwest would place the turbine on peat up to 2 m deep, offering little or no benefit in reducing deep peat impact. Therefore, relocating Turbine 3 would not optimise the avoidance of these constraints.

Mitigation is already proposed for the down-gradient, highly dependent M6 GWDTE located north of Turbine 3. This includes cross drains under tracks at regular intervals, with subsurface drainage directed to a suitable diffuse outfall above the GWDTE, avoiding indirect loss. The 0.5–1 m depth peat excavated will be reused locally.

The Applicant is of the view that the location of the turbine is compliant with the mitigation hierarchy as defined in National Planning Framework 4 (NPF4) for the development as a whole. For the placement of Turbine 3 in particular, the hierarchy has been applied as follows:

- Avoid – Attempts to avoid impact on peat through the siting of the turbine to the north of its final location was investigated and ultimately ruled out due to the potential for impacts on highly dependent GWDTE. Movement north was also prevented by the telecommunications link.
- Minimise – Impacts on peatland was minimised by orienting the hardstanding of the turbine so as much would be located outwith the peat deposits as possible.
- Restore – Extensive restoration is proposed as detailed in the Additional Information Report and its Technical Appendix 3: Habitat Management Plan.
- Enhance - Extensive enhancement is proposed as detailed in the Additional Information Report and its Technical Appendix 3: Habitat Management Plan.

The current location of Turbine 3 has been designed to minimise environmental impacts and is considered appropriate and compliant with guidance. Any movement of Turbine 3 is anticipated to result in greater environmental impacts due to other constraints on Site

Peatland Restoration

SEPA noted that "*the Developer advises there are limited opportunities for restoration on-site, and would ask if the neighbouring land could be considered for this, particularly as the Earlsburn windfarm extension next door is also in the planning stages."*

Consideration has been given to seeking offsite peatland restoration. The Applicant has conducted a search for existing peatland restoration schemes in the wider geographical area with the intention of seeking to contribute to existing restoration schemes. Such schemes are limited in number and present significant commercial and practical viability issues.

The Applicant welcomes opportunities to continue to explore any possibilities for collaboration with neighbouring landowners and developers when these opportunities arise.

Due to the lack of off-site opportunities, the Applicant has reviewed the design of the Proposed Development resulting in the Amended Design presented in the Additional Information submission. The Amended Design has sought to further maximise on-site opportunities, including peatland restoration through borrow pit reinstatement and sustainable peat storage. Restoration refers to the restoration of peatland and has no bearing on the movement or use of excavated peat.

Accordingly, the Applicant has been able to reconfigure elements of the design to increase the area of peatland restoration from 15.9 ha to 21.5 ha. Resulting in an increase of the loss to restoration ratio from 1:1.5 to 1:2.06.

Groundwater Environment

SEPA recommended that "*The source location of Muirpark Farm PWS should be confirmed, and if found to be with prescribed buffers a bespoke risk assessment undertaken.*

If any dewatering is proposed e.g. for proposed borrow pits, it should comply with GBR, in particular GBR15, and if quantities exceed 10m3/d a CAR registration or licence will be required".

A Private Water Supply Assessment (PWSA) for Muirpark PWS has been undertaken as detailed within the 2024 EIA Report. The assessment can be found in Technical Appendix 5 of the Additional Information submission.

The assessment concluded that no Proposed Development infrastructure is located within the PWS source catchment, and as such Muirpark PWS is not hydrologically connected. As detailed within the 2024 EIA Report and the Additional Information Report, mitigation measures have been suggested to minimise any potential impacts to the PWS during construction.

Pollution Prevention

Buckie Burn Catchment
SEPA has noted: *"The development sits at the top of the Buckie Burn catchment but the developer claims there is no hydrological connectivity. Should pollution reach the Buckie Burn, it will drain down into the Buckieburn Reservoir, where the University of Stirling abstract water for aquaculture purposes at the Niall Bromage Research Unit (Easter Buckieburn)….*

SEPA also noted:
..several tributaries of the Auchenbowie Burn also lie within the site. Although Milnholm fishery has now closed, there is an active abstraction from Auchenbowie weir into the lade which feeds the Swanswater recreational fishery at Cultenhove. This water then discharges into the Bannock Burn catchment."

It is confirmed that the Proposed Development Site, although located in part within the Buckie Burn catchment, is upgradient of and does not drain to Buckieburn reservoir; There is no hydrological connectivity between the Proposed Development and Buckieburn reservoir.

We trust that the deletion of borrow pit BP01 together with the additional detail on the rationale for the location of T3, groundwater environment, the Muirpark private water supply, and pollution prevention provides sufficient reassurance that SEPA's concerns have been fully addressed.

Yours sincerely

Jack Graham
Senior Consultant

atmos CONSULTING your project our expertise

CBC House
24 Canning Street
Edinburgh
EH3 8EG
E planning@atmosconsulting.com
W www.atmosconsulting.com

Enclosed:
Appendix A – T3 Constraints Plan

Appendix A

See Next Page

Drummarnock Wind Farm

wind2

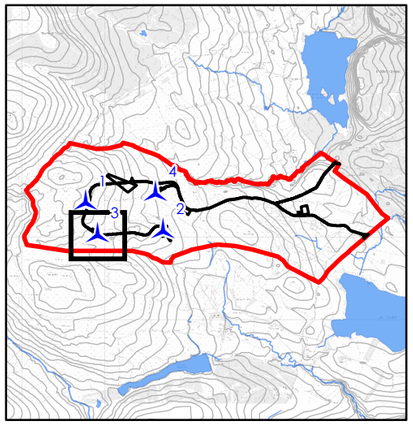
Figure 1-5
T3 Constraints

Key

- Site boundary
- Proposed Turbine
- Turbine foundation
- Crane hardstanding
- Auxiliary crane hardstanding
- Blade storage area
- Nacelle storage area
- Tower storage area
- Earthworks - cut
- Earthworks - fill
- Onsite access track - cut
- Onsite access track - floating
- Fixed Communications Link
- Phase 2 peat survey extents

Constraint buffer

- 20m from 1:10k watercourse
- 50m from 1:50k watercourse
- 111.5 - 136.5m from Fixed Communications link



atmos CONSULTING

0 25 50 100
Metres

N

Scale @ A3:
1:2,000

17/07/2025 TL026 40419/CP/136a
Drawn by: LB Checked by: TH Approved by: JG

Overall GWDTE Score
- 1
- 2
- 3
- 4
- 5

Slope gradient
- 12 - 14%
- Greater than 14%

Interpolated peat depth (m)
- 0 - 0.5
- 0.6 - 1
- 1.1 - 1.5
- 1.6 - 2
- 2.1 - 2.5
- 2.6 - 3
- 3.1 - 3.5

Constraints based on 98.5m hub, 180m tip turbines