



Technical Appendix 4.2: EIA Scoping Opinion

Department: ERM
Project: Bowshiel Solar Farm and BESS
Document Code: 0733784

April 2025



Scottish Government
Riaghaltas na h-Alba
gov.scot

**The Scottish Government
Energy Consents Unit**

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

**ECU00005085:
Bowshiel Solar Farm and Battery Energy Storage System**

Voltalia UK Limited

4 April 2025

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government to Voltalia UK Limited a company incorporated under the Companies Acts with company number 07489990 and having its registered office at The Wheelhouse, Bond's Mill Estate, Stonehouse, Gloucestershire, England, GL10 3RF ("the Company") following a request dated 29 October 2024 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Bowshiel Solar PV Farm and Battery Energy Storage System ("the proposed development"). The request was accompanied by a scoping report. A Scoping Opinion was issued on 28 January 2025.

1.2 The Scoping Opinion provided in this document supersedes the Scoping Opinion dated 28 January 2025.

1.3 The proposed development would be located on land approximately 2.4 kilometres (km) south of the village of Cockburnspath.

1.4 The site will occupy an area of approximately 190 hectares (ha) and is wholly within the Scottish Borders Council administrative area. The proposed development includes a ground-mounted solar photovoltaic ('PV') development with a generating capacity of up to 170MW, Battery Electric Storage System (BESS) with a generating capacity of up to 150MW, associated infrastructure, access, and landscaping.

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

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between the Company and the Scottish Government. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 19 November 2024. The consultation closed on 10 December 2024. An extension was granted to Scottish Borders Council and an interim Scoping Opinion was issued on 28 January 2025. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Scottish Borders Council responded on 3 April 2025. The Scoping Opinion provided in this documents supersedes the earlier Scoping Opinion. All consultation responses received are attached in **ANNEX A Consultation responses**.

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

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

2.4 The following organisations were consulted but did not provide a response: British Horse Society Scotland; John Muir Trust; RSPB Scotland; Scottish Water; Scottish Wildlife Trust; Visit Scotland; Woodland Trust; Oldhamstocks Community Association; Cockburnspath & Cove Community Council; East Lammerrmuir Community Council (ELCC); Grantshouse Community Council; Berwickshire Community Councils; Scottish & Southern Electricity Networks; Scottish Power Energy Networks; and, Scottish Fire and Rescue Service.

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

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

3. The Scoping Opinion

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

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 29 October 2024 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

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

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

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Sections 5 to 12 of the scoping report.

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

3.7 The proposed development set out in the scoping report refers to technologies including battery storage and/or solar panels. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to: the scale of the development (dimensions of the solar panels, battery storage); components required for each generating station; and, minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage.

3.8 Scottish Water did not provide information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.9 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

3.10 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.11 The scoping report identified viewpoints at Table 5.2 to be assessed within the landscape and visual impact assessment. The forthcoming, updated Scoping Opinion is likely to provide further comment on the scope of the EIA in relation to landscape and visual factors. The Company should agree viewpoints with the Planning Authority prior to submission of an application.

3.12 The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 11 of the scoping report.

3.13 It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot.

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

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

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;

- underground cables;
- water pipes;
- telecommunications links.

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

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

4. Mitigation Measures

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

5. Conclusion

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

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

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

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

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

5.6 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

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

James McKenzie

Scottish Government Energy Consents Unit
4 April 2025

ANNEX A

Consultation

List of consultees who provided a response.

- BT
- Historic Environment Scotland
- NatureScot
- Network Rail
- Office of Nuclear Regulation
- Scottish Borders Council
- Scotways
- SEPA
- Scotland Gas Networks

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry.

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

ANNEX B

Consultation Responses

See following pages.

Katie Butchart

From: radionetworkprotection@bt.com
Sent: 26 November 2024 14:50
To: James McKenzie; Econsents Admin
Cc: radionetworkprotection@bt.com
Subject: FW: WID13641 Request for Scoping Opinion for Bowshiel Solar Farm & Battery Energy Storage System (BESS)



OUR REF; WID13641

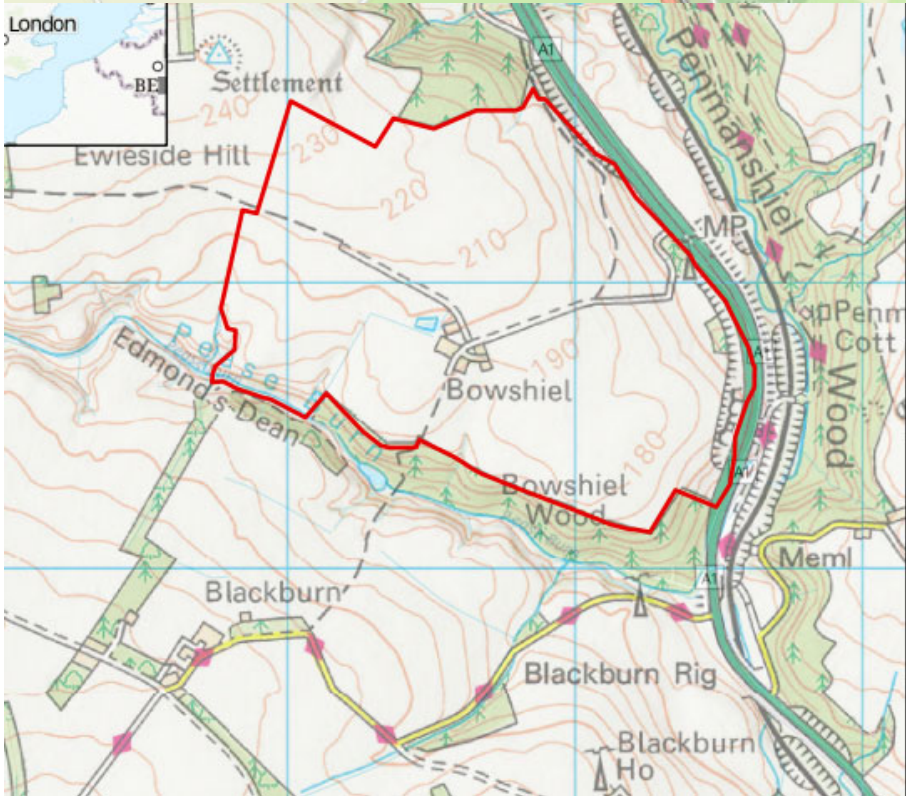
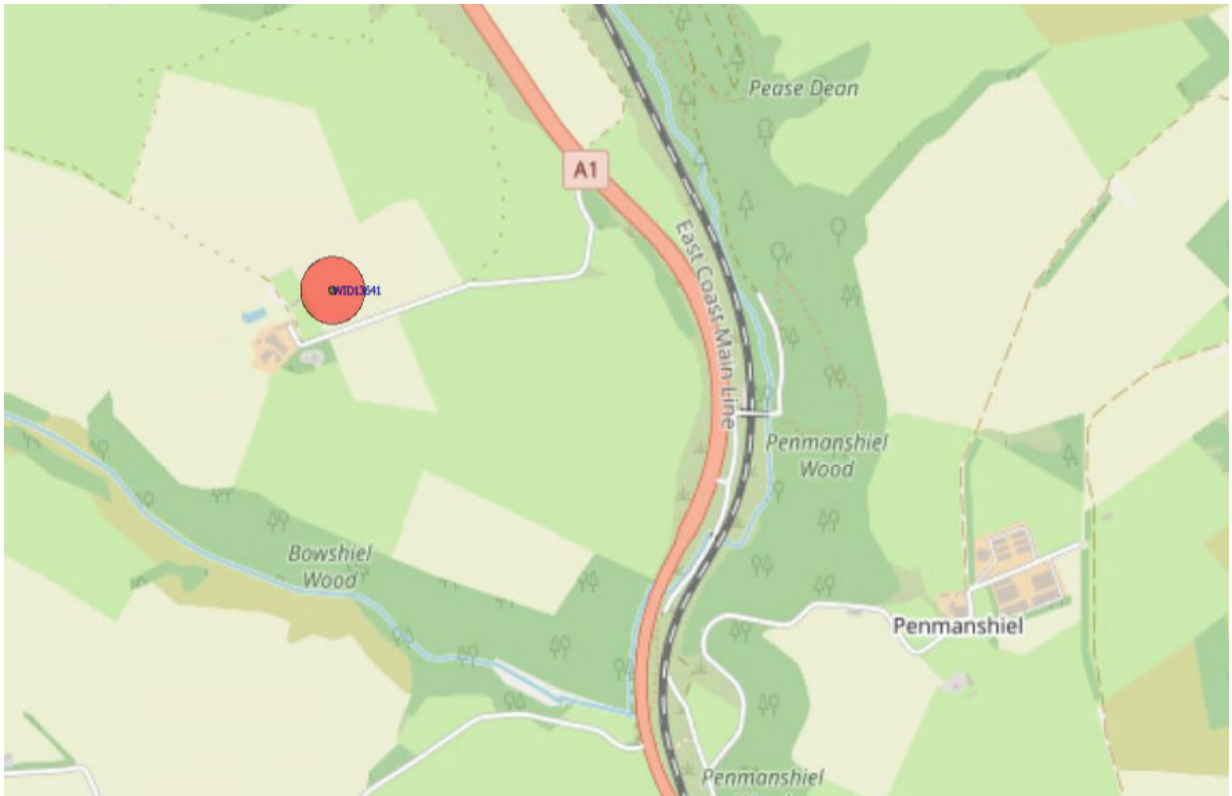
We have studied the location below with respect to EMC and related problems to BT point-to-point microwave radio links.

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

BT requires 100m minimum clearance from any structure to the radio link path. If there are any changes to this location please let us know and we will reassess this for you.

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

Please direct all queries to radionetworkprotection@bt.com



SCALE: See Scale Bar SIZE: A4 PROJECT: 0733745 DATE: 28/08/2024		VERSION: A01 DRAWN: RW CHECKED: MW APPROVED: RO
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**Bowshiel Solar Farm and BESS
Scoping Report
Figure 1.1
Site Location Plan**



Kind Regards

Lisa Smith
National Radio Planner
Network Planning



This email contains information from BT Group that might be privileged or confidential. And it's only meant for the person above. If that's not you,



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email: Econsents_Admin@gov.scot

James McKenzie
Onshore Electricity Policy, Strategic Co-
ordination & Consents Division
Energy Consents Unit
Directorate for Energy and Climate
Change
Scottish Government

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300074920
Your ref: ECU00005231
16 January 2025

Dear James McKenzie

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Bowshiel Solar Farm and Battery Energy Storage System (BESS)

Scoping Report

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 19 November 2024. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

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

Proposed development

We understand that the proposed development comprises construction and operation of a ground-mounted solar photovoltaic (PV) development with a generating capacity of up to 170MW, Battery Energy Storage System (BESS) with a generating capacity of up to 150MW, associated infrastructure, access, and landscaping. The proposed development is to be located on land approximately 2.4km south of the village of Cockburnspath, and 13km southeast of Dunbar.

Scope of assessment

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

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

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

We have identified likely significant effects on our historic environment interests. We note that a scheduled monument known as [Ewieside Hill, fort 640m NE of Edmondsdean \(SM369\)](#) is located in very close proximity to the development boundary.

Our advice on the likely nature of impacts on heritage assets within our remit, and any potential mitigation measures, are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#). In this case we recommend that you consider the advice in the [Setting](#) guidance note.

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

Yours sincerely

Historic Environment Scotland



ANNEX

Scoping Report

We are content with the scope of the cultural heritage assessment as set out in Chapter 6 of the supplied Scoping Report. The assessment should be supported by specific visualisations which we provide advice on below.

The following scheduled monuments are located within 3km of the proposed site and have been identified within the Scoping Report:

- [Ewieside Hill, fort 640m NE of Edmondsdean](#) (SM369)
- [Cockburnspath Tower, tower & ancillary buildings 390m N of Tower Farm](#) (SM13317)
- [Winding Cairn](#) (SM12469)
- [St Helen's Church, church & hog-backed monuments](#) (SM382)

Whilst other scheduled monuments have settings that would be impacted by the proposed development, we consider that the greatest impact would affect Ewieside Hill (SM369). This monument survives as an exceptional field monument with well-preserved upstanding remains. Of probable Iron Age date, the site is an enclosed settlement consisting of three concentric ramparts and ditches with the remains of a least two ring-ditch houses. Situated on the summit of Ewieside Hill at about 251m OD the fort occupies a commanding and prominent position within the landscape, possibly an indicator of its significance within Iron-Age or early-historic society. The summit of Ewieside Hill has panoramic views, with the monument's setting characterised by its location on an open hilltop at the end of a high ridge with commanding views to the east, south and north. The settlement was intentionally positioned to not only command view outwards, but also to be a highly visible feature within the landscape.

Our Advice

Based on the information provided, the proposed development would likely have a significant impact upon the setting of assets within our remit and detailed assessment of impacts will be needed in the EIA Report. We have restricted our comments here to impacts upon [Ewieside Hill, fort 640m NE of Edmondsdean](#) (SM369) as this would be likely to experience the most significant impacts.

The proposed development, consisting of a substation, BESS and solar panels, would be located on the southern slopes of Ewieside Hill. The closest solar panels in field 12 would be about 225m from the fort with the edge of the BESS compound in field 13 about 315m from the monument. The closest panels to the fort would be at about c.235m OD and as the solar panels would be approximately 3.2m high, the upper panels would be less than 13m lower than the monument. It is unclear how tall elements of the substation would be.



On the basis of the information presently available, the spatial relationship between the monument and its environs would be disrupted due to crowding and visual dominance caused by the proximity of solar panels in field 12 and the adjacent BESS in field 13, and that the agricultural character of the land around the monument would be altered.

Based on the information already available, it is likely that some design change will be needed to mitigate and reduce the crowding of the monument resulting from the proposed development and to reduce the impact on views to and from the monument. As a minimum, and based on the information presently available, we recommend the applicant considers a redesign of field 12, potentially to bring the tops of the solar panels below the 230m OD contour line. We also recommend the applicant considers relocating the BESS compound in field 13 downslope if required to ensure that upstanding elements within it do not project above the top of the solar panels in the redesign of field 12. However, additional mitigation may be needed depending on the results of further assessment using visualisations.

We welcome the proposed viewpoint locations as set out in Table 5.2 but we would need additional information in order to be able to give a more definitive view on the proposal – for example, it would be helpful to include views illustrating the impact of the suggested mitigation. We therefore request a visualisation in the form of two photomontages to allow assessment of the severity of this impact. The first photomontage should be from the outer rampart adjacent to the gate leading east into the adjacent field. It should show (A) the current view from the edge of the monument looking southeast; (B) the same view but with the development as presently proposed in place; and (C) the same view but with the tops of the solar panels lowered and the BESS compound relocated downslope. The second photomontage should be from proposed viewpoint 6 and should show (A) the current view towards SM369 with the monument clearly marked; (B) the same view but with the development as presently proposed in place; and (C) the same view but with the tops of the solar lowered and the BESS compound relocated downslope.

Further Assessment

We have requested visualisations for Ewieside Hill, fort 640m NE of Edmondsdean (SM369) above.

Mitigation

At this stage, we have identified that mitigation by design is likely to be appropriate in the form of a redesign of field 12 to increase the distance to the solar panels and reduce their height, potentially to below the 230m OD contour line, alongside the relocation downslope of the BESS compound in field 13. As the results of further assessment become available, additional mitigation may be required to reduce setting impacts on the scheduled monument.

Historic Environment Scotland
16 January 2025

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

Our ref:
CNS/REN/OTH/SOLAR/SB/BOWSHIEL
Your ref: ECU00005231

Econsents_Admin@gov.scot

6 December 2024

FAO James McKenzie

Dear Sir

**ELECTRICITY ACT 1989 SECTION 36
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
SCOPING OPINION REQUEST FOR BOWSHIEL SOLAR FARM AND BATTERY ENERGY STORAGE
SYSTEM, SCOTTISH BORDERS**

Thank you for consulting us on the scope of the environmental impact assessment (EIA) in relation to our interests for the Bowshiel Solar Farm and Battery Energy Storage System (BESS) in Eastern Berwickshire.

Our advice is based on the Bowshiel Solar Farm and Battery Energy Storage System (BESS) EIA Scoping Report prepared by ERM for Volitalia, dated September 2024.

The Proposal

This development of ground-mounted solar photovoltaic (PV) panels with a BESS would be located on around 190 hectares of land at Bowshiel, south of Cockburnspath. The solar PV would have a generating capacity up to 170MW and the BESS up to 150MW. The number of panels proposed is not specified, and the development would be operational for 40 years.

NatureScot Advice

The Scoping Report appears comprehensive in its approach to EIA.

Reference should be made to our on-line 'General pre-application and scoping advice for solar farms', available [here](#). Where the guidance is not followed in the EIA process we would expect explanations to be given in the EIA Report accompanying the application.

Landscape and Visual Impacts

We are content with the proposed approach to assessment of impacts.

Ecology and Ornithology

We are content with the proposed approach to the surveys and the assessment of impacts.

We agree that impacts on notified features of nearby SSSI designated sites can be scoped out of assessment, for the reasons given in the Report.

We agree that there is no likely significant effect from the proposal on the qualifying interests of nearby SPAs and SACs for the reasons given in the Report. These sites are Outer Firth of Forth and St Andrew's Bay Complex SPA; Firth of Forth SPA; St Abb's Head to Fast Castle SAC and SPA; Berwickshire and North Northumberland Coast SAC; and Greenlaw Moor SPA.

We are content with the effects scoped in to the assessment, as summarised in Table 7.2 and those scoped out of the assessment summarised in Table 7.3.

Landscape and Biodiversity Masterplan

We support the proposal for the EIA Report to include an outline Landscape and Biodiversity Masterplan (LBMP) that would be worked up and implemented should the proposal be granted permission. This should include measures to improve the overall condition of habitats of conservation interest within the site.

Construction Environmental Management Plan

We support the proposal for the EIA Report to include an outline Construction Environmental Management Plan (CEMP).

Please note, these comments are given without prejudice to any comments we may wish to make in future regarding this development proposal.

This advice is provided by NatureScot, the operating name of Scottish Natural Heritage.

Please contact me should you wish to discuss our response.

Yours sincerely

By e-mail

Anne Brown
Operations Officer - South

Copy: Scott Shearer, Scottish Borders Council



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

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

Selina Gourlay
Town Planning Technician

Planning reference: ECU00005085
Case Officer: James McKenzie

E-Mail:
TownPlanningScotland@networkrail.co.uk

Network Rail ref: 365 2024
04/12/2024

Dear Mr McKenzie,

Town and Country Planning (Scotland) Act 1997 (as amended)
Re: Request for Scoping Opinion Bowshiel Solar Farm & Battery Energy Storage System (BESS) Hybrid Renewables (Other Generating Station)

Thank you for consulting Network Rail regarding the above development.

Network Rail must object to this application in its current form as additional information is required to fully assess the impacts of the development on the adjacent railway.

To allow Network Rail's Fire Safety Engineer to fully assess the proposal the applicant should provide the following information:

1. Details of the active and passive fire safety provisions provided on the site i.e. what type of fire alarm systems, what type of fire suppression systems, safety cut-off switches, any fire resisting compartmentation and details of the proposed fire resistant insulation.
2. What is the distance of the battery storage equipment from the operational railway.
3. Details of any passive fire safety provisions on the site.

4. Site specific fire risk/DSEAR assessments once these are produced (as Network Rail is a neighbour, we would like sight of any significant fire safety issues noted in the fire risk/DSEAR assessment documents).
5. Nearest public or private fire hydrant.
6. Location of nearest full time fire station.

Network Rail would also request the following matters are taken into account, and if necessary and appropriate included as conditions or advisory notes, if granting the application:

A glint and glare assessment must be carried out by the developer in order to assess the possible impacts of the proposed solar PV panels on signalling equipment and the operational railway. The safety of the railway is paramount and any potential risk from adjacent development should be minimised as far as possible.

Reason: *To protect the stability of the adjacent railway lines and the safety of the rail network.*

Buildings should be situated at least 2 metres from Network Rail's boundary. The applicant must ensure that the construction and subsequent maintenance of proposed buildings can be carried out without adversely affecting the safety of, or encroaching upon, Network Rail's adjacent land.

Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.

- Details of all changes in ground levels, laying of foundations, and operation of mechanical plant in proximity to the rail line must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a "possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.

The developer must contact our Asset Protection Engineers regarding the above matters, either by [submitting an enquiry on the Network Rail website](#) or by writing to:

**Network Rail Asset Protection Engineer
151 St. Vincent Street, GLASGOW, G2 5NW**

E-mail: AssetProtectionScotland@networkrail.co.uk

Further information regarding working on or near the railway can be found on the [Network Rail website](#).

We trust full cognisance will be taken of these comments. We would be grateful if Local Planning Authorities would provide a copy of the Decision Notice.

Yours sincerely

REDACT

**Selina Gourlay
Town Planning Technician**

Katie Butchart

From: ONR Land Use Planning <ONR-Land.Use-Planning@onr.gov.uk>
Sent: 20 November 2024 15:58
To: Econsents Admin
Subject: ONR Land Use Planning - Application Bowshiel Solar Farm - ECU00005085

Dear Sir/Madam,

The proposed development does not present a significant external hazard to the safety of Torness nuclear site.

Therefore, ONR does not advise against this development.

Kind regards,

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

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

From: James.McKenzie@gov.scot <james.mckenzie@gov.scot >
To: prs@scotborders.gov.uk;HMConsultations@hes.scot;South@Nature.scot;planning.south@sepa.org.uk;
Cc:
Sent: 19/11/2024 11:23
Subject: Request for Scoping Opinion for Bowshiel Solar Farm & Battery Energy Storage System (BESS)

Dear consultee,

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

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
BOWSHIEL SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM

On 19 September 2024, Valtalia UK (the Applicant) submitted a request for a scoping opinion from the Scottish Ministers for the proposed section 36 application for the Bowshiel Solar Farm & Battery Energy Storage System (BESS). The proposed development is for solar photovoltaic panels and battery energy storage located in the planning authority area of Scottish Borders Council, in line with regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

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



Scottish
Forestry
Coilltearachd
na h-Alba

South Scotland Conservancy
Greystone Park
55/57 Moffat Road, Dumfries
DG1 1NP

Southscotland.cons@forestry.gov.scot

Email: scottish.forestry@forestry.gov.scot
Tel: 0131 370 6500

Conservator: Neil Murray

James McKenzie
Scottish Government
Onshore Electricity, Strategy and Consents

by email: James.McKenzie@gov.scot

Date: 27.11.2024

Dear James

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

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR
BOWSHIEL SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM**

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

Looking at the scope of this proposal, there are some areas of existing woodland/trees around the perimeter of the proposed solar farm. Broadly speaking the layout of the solar arrays avoid the areas of woodland and from what is visible in the proposal, there appear to be no plans to remove woodland cover. The only section where there is perhaps some tree felling needed is around the disused quarry as the aerial photographs show some tree cover albeit minimal.. I have included some standard response content below which is relevant if felling is proposed.

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

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

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

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

- **Woodlands with a strong presumption against removal**
Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged on their individual merits and such cases will require a high level of supporting evidence. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value.
- **Woodland removal with a need for compensatory planting**
Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed.

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

- b) Development proposals will not be supported where they will result in:*
- i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;*
 - ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy;*
 - iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy;*
- c) Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered.*
- d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.*

Broader general comments in relating to proposals involving forests and woodlands.

Scottish Government's policy on control of woodland removal: implementation guidance February 2019 <https://forestry.gov.scot/support-regulations/control-of-woodland-removal> provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help us reach an informed decision on the potential impact of the proposed development. Detailed information on any compensatory planting proposals should also be provided.

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

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

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

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

Yours sincerely



Neil Murray

Conservator
South Scotland Conservancy



Econsents_Admin@gov.scot

James McKenzie
Other Generation Team
Energy Consents Unit
The Scottish Government

Our Ref: 11232
15/01/2025

Dear Mr McKenzie,

ECU ref: ECU00005085

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION FOR BOWSHIEL SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM

Thank you for your email of 19 November 2024 seeking comments on the scoping report for the above proposal. We gratefully acknowledge the additional time allowed for our response.

[ScotWays records](#)

The enclosed map shows that right of way BB84 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 Plan*.

The enclosed map shows other path BB190 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 Plan*.

The enclosed map shows that our book *Scottish Hill Tracks* describes route SHT(6)031 which crosses or is close to the application site as shown on Figure 1.1 *Site Location Plan*.

In searching our records at this scoping stage, we have focussed solely on the **immediate** area of the proposed application. If required by the applicant to inform their Environmental Impact Assessment (EIA), maps of a wider search area are available from ScotWays, alongside a more detailed response.

Other Access to Land

You should be aware that other forms of public access to land may affect the planning application site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes. The applicant is no doubt aware that the Southern Upland Way, a long distance route which is used by walkers, runners and cyclists sits on the application boundary. This route is promoted by NatureScot (formerly Scottish Natural Heritage) as one of Scotland's Great Trails.

Recreational Amenity

As well as direct impacts of development upon public access, ScotWays has an interest in impacts on recreational amenity, so this includes the impact of developments on the wider landscape. We anticipate that the applicant will take into account both recreational amenity and landscape impacts in developing their proposals for this site. We will consider these issues further should this scoping stage lead to a planning application.

Comment

In the Scoping Report 5.2.3 with reference to 'Visual receptors and visual amenity' it is stated: *'As illustrated by Figures 5.1-5.3 visual receptors within 2km of the Site include ... Core Paths, public rights of way or those exercising their right to roam.'*

Whilst these figures may show areas in the vicinity of the application site they do not appear to show any of the routes indicated by the applicant. We would anticipate that these would be updated in any forthcoming application.

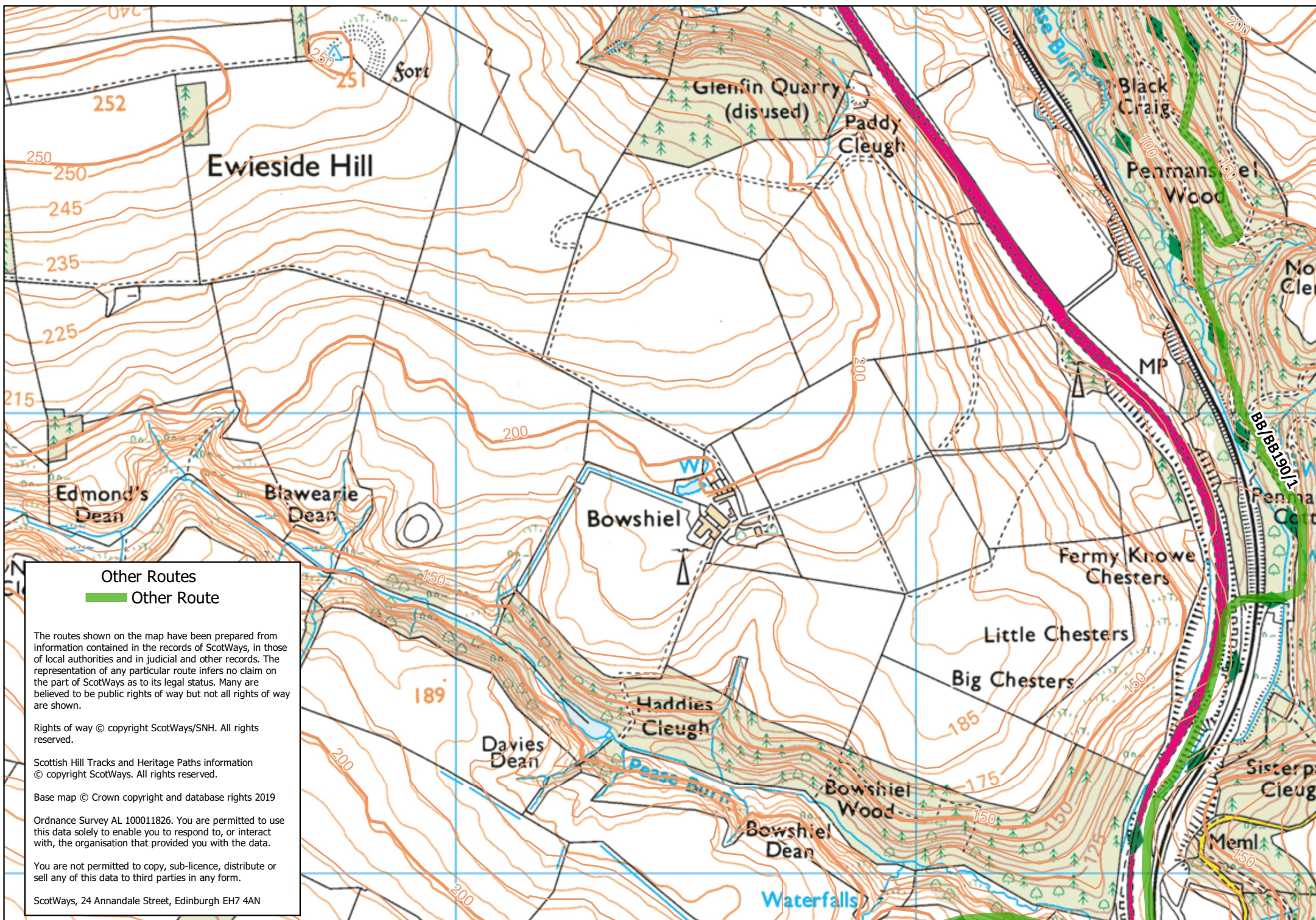
Under section 3 of the Land Reform (Scotland) Act 2003, there is a duty upon landowners to use and manage land responsibly in a way which respects public access rights. Under section 14 of the same Act, access authorities have a duty to uphold access rights. Accordingly, we suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.

I hope the information provided is useful to you. Please do not hesitate to contact us if you have any further queries.

Yours sincerely,

Lynda L Grant

Lynda Grant
Access Officer



Other Routes

Other Route

The routes shown on the map have been prepared from information contained in the records of ScotWays, in those of local authorities and in judicial and other records. The representation of any particular route infers no claim on the part of ScotWays as to its legal status. Many are believed to be public rights of way but not all rights of way are shown.

Rights of way © copyright ScotWays/SNH. All rights reserved.

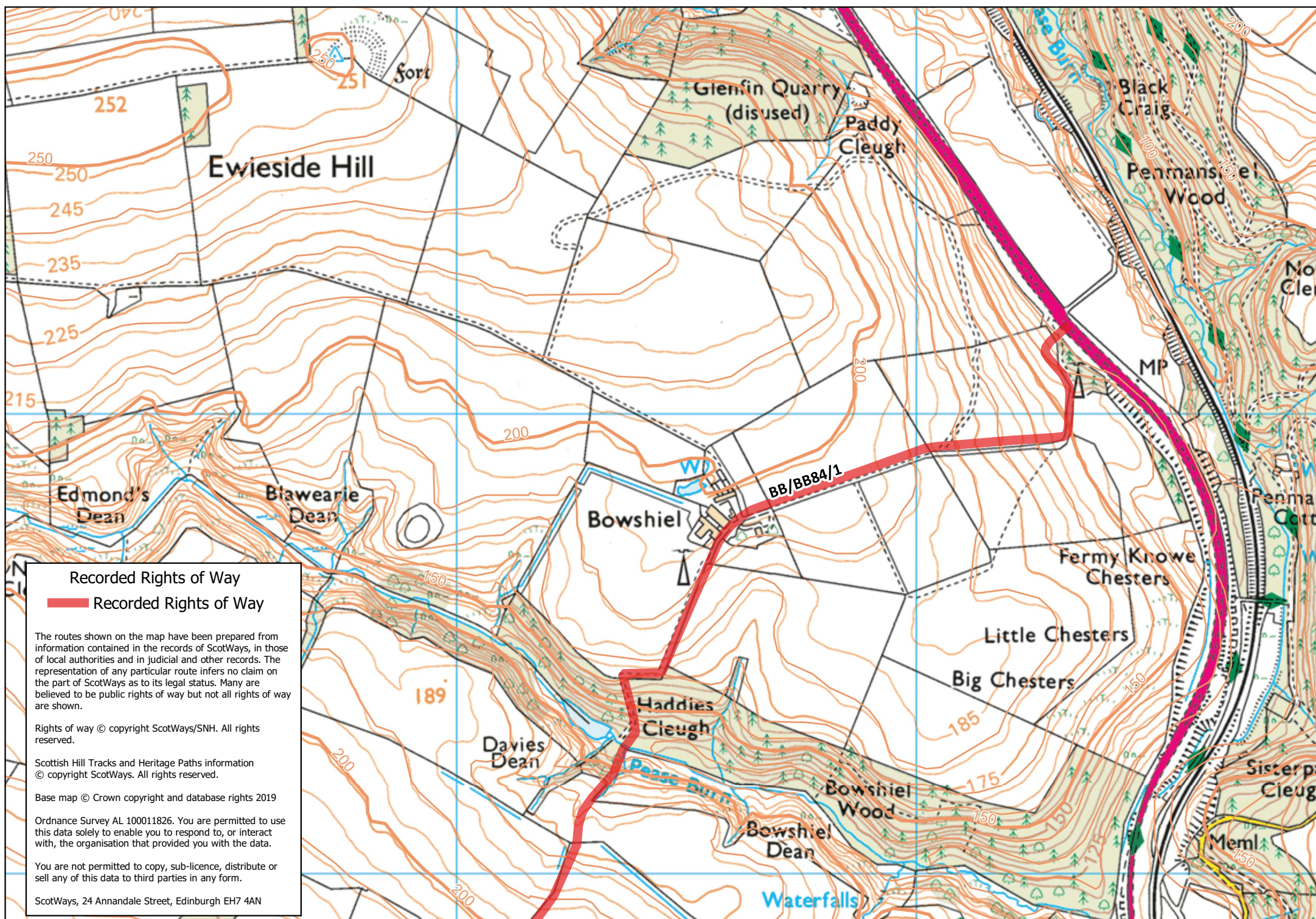
Scottish Hill Tracks and Heritage Paths information © copyright ScotWays. All rights reserved.

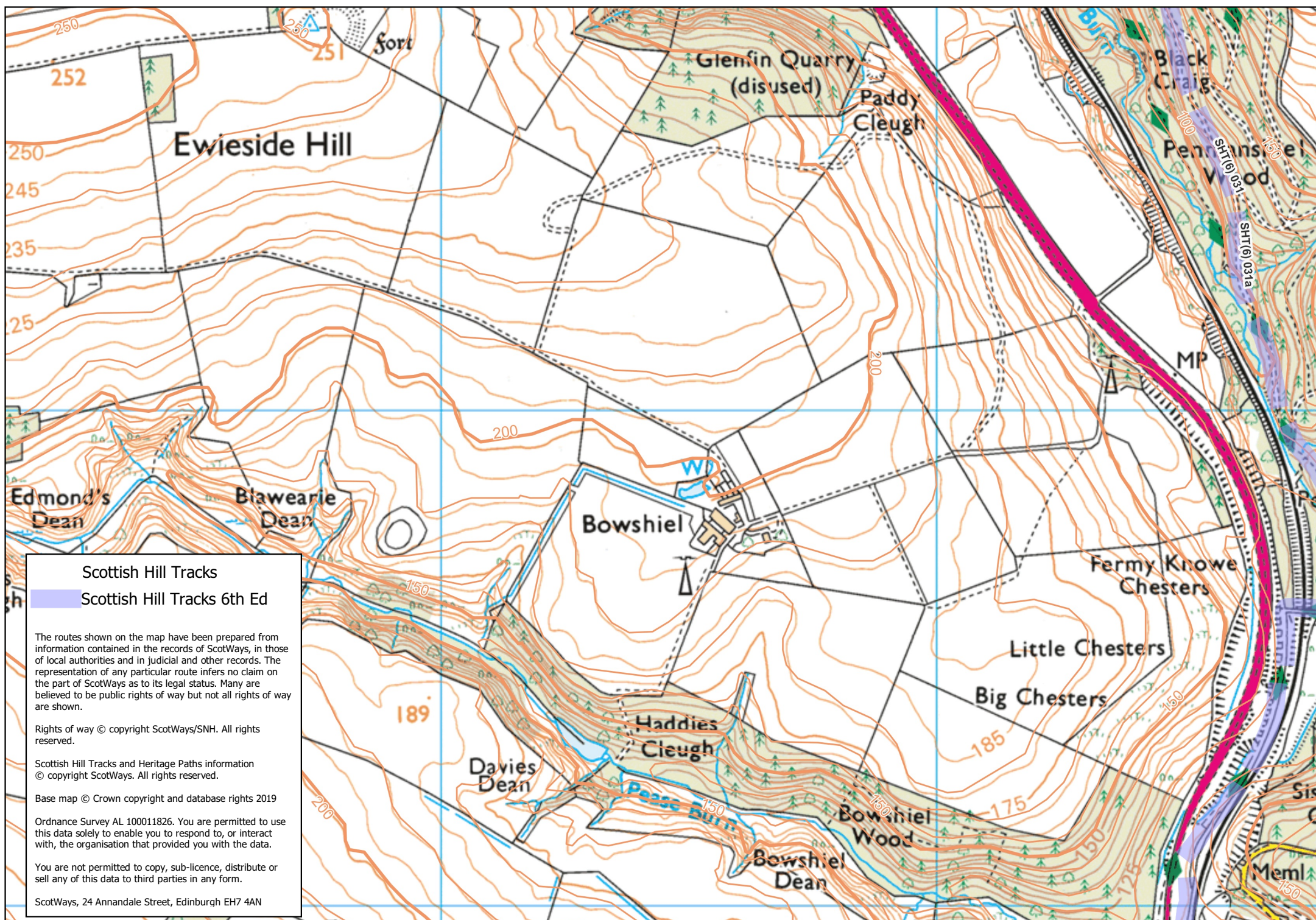
Base map © Crown copyright and database rights 2019

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ScotWays, 24 Annandale Street, Edinburgh EH7 4AN







Catalogue of Rights of Way Planning Comment Guidance Notes

These notes explain what is shown on the maps provided with planning application comments and provide information about the public right of access to land in Scotland. All maps are provided on a 1:50,000 scale base.

What is the Catalogue of Rights of Way (CROW)?

CROW was created by ScotWays in the early 1990s with the help of Scottish Natural Heritage (now NatureScot) and local authorities and is an amalgamation of rights of way information from a number of different sources. Mapped at 1:50,000 scale, the catalogue does not include all rights of way – many of these are known only to local people and come to ScotWays' notice only when a problem arises.

CROW is continually updated to take account of new information as it comes to ScotWays' attention.

What is a Recorded Right of Way?

Any right of way that we record in the Catalogue of Rights of Way.

Where any Recorded Rights of Way pass through or close to the application site a map will be provided showing them.

What is an Other Route?

Any path that we record in the Catalogue of Rights of Way that does not appear to meet the criteria to be a right of way.

Where any Other Routes pass through or close to the application site a map will be provided showing them.

What is a Heritage Path?

These are historic routes that form part of the transport heritage of Scotland. They reflect our cultural and social development and include drove roads, military roads, Roman roads, pilgrim routes and trade routes.

These routes may or may not be rights of way, core paths or carry some other type of designation.

Find out more about the Heritage Paths project at <http://www.heritagepaths.co.uk>

Where any Heritage Paths pass through or close to the application site a map will be provided showing them.

What is a Scottish Hill Track?

First published in 1924, our book *Scottish Hill Tracks* is a record of the network of paths, old roads and rights of way which criss-cross Scotland's hill country, from the Borders to Caithness.

These publicised routes may or may not be rights of way, core paths or carry some other type of designation.

Copies of our book *Scottish Hill Tracks* can be purchased from the ScotWays webshop: <https://www.scotways.com/shop>

Where any *Scottish Hill Tracks* routes pass through or close to the application site a map will be provided showing these.

Disclaimer

*The routes shown on the **CROW** maps provided have been prepared from information contained in the records of ScotWays, local authorities, judicial and other records. The inclusion of a route in CROW is not in itself definitive of its legal status.*

Other Public Access Information

You should be aware that other forms of public access to land may affect your site of interest.

Unrecorded Rights of Way

Our records only show the rights of way that we are aware of. Scots law does not require a right of way to be recorded in a specific document. Any route that meets the following criteria will be a right of way. This could include any paths, tracks or desire lines within your area of interest. A right of way:

1. Connects public places.
2. Has been used for at least 20 years.
3. Follows a more or less defined route.
4. Has been used by the public without judicial interruption or the landowner's permission.

Core Paths

The Land Reform (Scotland) Act 2003 requires all access authorities to create a system of routes within their area. These are known as core paths and are recorded in the authority's core paths plan. It is anticipated that planners will have consulted their access authority's core paths plan to check whether any core paths cross or are close to the application site, and will also have consulted the authority's access team.

The General Right of Access

Irrespective of the presence or absence of rights of way and core paths, the land in question may be subject to the access rights created by Section 1 of the Land Reform (Scotland) Act 2003. Unless the land falls into one of the excluded categories in Section 6 of this Act, the public has a right of access to the land, and land owners/managers have a duty under the Act's Section 3 to consider this in any decisions made about the use/management of the land.

Other Promoted Routes

There may be a promoted route running through or close to any planning application site. Such routes will usually be clearly marked with signposts or waymarking and may feature in guidebooks, leaflets, on local information boards and on websites. The two main types of nationally promoted routes are:

Scotland's Great Trails: <https://www.scotlandsgreattrails.com>
National Cycle Network: <https://www.sustrans.org.uk/map-ncn>

Public and Private Roads

The Roads (Scotland) Act 1984 created the terms 'public road' and 'private road'. Public roads are those roads which are on the List of Public Roads and which, importantly, the roads authority is required to manage and maintain. Private roads are those roads which are not on the List of Public Roads and thus there is no duty on the roads authority to manage or maintain them. There is a public right of passage over these roads and the owner(s) of a private road may not restrict or prevent the public's right of passage over the road.

If required, the local roads authority should be contacted for more information on public and private roads that may cross or pass close to the application site.

More Information on Outdoor Access Law

If you would like to know more about outdoor access law, why not visit our website (<https://scotways.com/outdoor-access/>) or get a copy of our book "*The ScotWays Guide to the Law of Access to Land in Scotland*" by Malcolm Combe (<https://www.scotways.com/shop>)?

Development and Planning Applications

When proposing to develop a site, it is advisable that the applicant reviews the current amount and type of public access across it and presents this as an access management plan as part of their planning application. This should include rights of way, core paths, other paths and tracks, and take account of how the statutory right of access currently affects the site.

The plan should then consider the effect that the proposed works, during construction and upon completion, would have on any patterns of public access identified. Any good practice guidance associated with the proposed type of development should be considered, e.g. for windfarms the NatureScot "*Good Practice during Wind Farm Construction, Part 8 Recreation and Access*" and "*Siting and Designing Wind Farms in the Landscape*", and the policies contained within any local statutory plans.

Depending upon the proposals there may be specific legal processes that must be followed to divert any paths or tracks either temporarily or permanently. These will be in addition to getting planning permission for the proposal. We recommend that applicants contact the access team at the relevant access authority for advice in this regard.

James McKenzie
Other Generation Team
Energy Consents Unit

Our Ref: PCS-20003724
Your Ref: ECU00005085

SEPA Email Contact:

By email only to: Econsents_Admin@gov.scot planning.south@sepa.org.uk

10 December 2024

Dear James McKenzie

Electricity Act 1989 - Section 36

ECU00005085

Request for Scoping Opinion for Bowshiel Solar Farm & Battery Energy Storage System (BESS)

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

Our position and advice, given below, is based on the determining authority ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 and 22, as defined in National Planning Framework 4. If this is not the case, please advise so we can re-consider our position and advice.



Chair
Lisa Tennant

CEO
Nicole Paterson

SEPA
Unit 6
4 Parklands Avenue
Holytown
Motherwell
ML1 4WQ

Tel: 03000 99 66 99
www.sepa.org.uk

Advice for the planning authority / determining authority

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

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

1. Site specific comments

- 1.1 Peat and Carbon-Rich Soils (CRS) - We note in Chapter 9 that impacts on peat and soils are proposed to be scoped out of further assessment. The justification for this relies on the Carbon and Peatland Map (2016) showing no Class 1 or Class 2 peatland within 500m of the site. These maps are indicative only, and no site-specific assessment appears to have been carried out. **We are of the view that currently, insufficient information has been provided to support this topic being scoped out of EIAR.** In order to address this, in the first instance, high resolution (phase 1) peat probing must be carried out in order to determine whether peat or other carbon-rich soils (as defined in NPF4) are present on site. Further information is provided in Section 4 of the Appendix. We would be happy to engage further with the applicant when this information is available
- 1.2 Groundwater Dependent Terrestrial Ecosystems - Chapter 7, Question 7.2 – we note that a Phase 1 habitat survey will be carried out. We have no specific view on the conversion to UkHab, however please note that If the Phase 1 habitat survey results indicate that there may be relevant habitats present, a National Vegetation

Classification (NVC) survey should be provided as part of the EIAR. Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC. For further information please refer to Appendix Section 5.

- 1.3 Private Water Supplies (PWS) - We agree that impacts on PWS should be assessed further. Please refer to Appendix Section 5 for further information on our requirements.
- 1.4 Flood Risk - In relation to the specific questions for consultees we are able to respond as follows:
- 8.2 - We agree there is no obvious need for a standalone FRA. The site layout (Figure 1.2) shows the red line boundary is either set back from the Pease Burn or remains undeveloped as a land parcel. There is no evidence of land raising near the burn and ground levels shown on OS mapping show the development area is elevated above the burn by several meters. We hold no records of flooding at the site.
 - 8.3 - We would recommend that any new watercourse crossing is designed in accordance with the principles of National Planning Framework 4, will have a better or neutral effect on flood risk and should be properly maintained to reduce the potential risk from structure blockage. The crossing should therefore be designed so that it can convey the 0.5% annual probability flood plus an appropriate allowance for climate change and freeboard, should have a minimal afflux (backwater effect) and a clear span structure where possible. We would strongly advise that any water course crossings follow good practice guidelines without causing constriction of flow or exacerbation to flood risk elsewhere. A [Good Practice Guide for River Crossings](#) and guidance on [Culverting of Watercourses](#) can be found on the SEPA website. We also recommend adoption of appropriate buffer strip distances between proposed development and the open channel in order to allow for access and maintenance. Recommended widths can be found in SEPA's [Recommended riparian corridor note](#).

- 8.4 - We have nothing specific to add. Assuming that this development would be classed as Essential Infrastructure for the purposes of assessment against NPF4 policy 22, and that no land raising will take place within the flood risk area, we would refer to Category 1 of our [Flood Risk Standing Advice](#).

2. Regulatory advice for the applicant

2.1 Details of regulatory requirements and good practice advice, for example in relation to engineering works in the water environment and waste management, can be found on the [regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: elb@sepa.org.uk

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

Yours sincerely

Jessica Taylor

Senior Planning Officer

Planning Service

Ecopy to: james.mckenzie@gov.scot

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue.

Further information on our consultation arrangements generally can be found on our [website planning pages - www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/)

Appendix 1: Detailed scoping requirements

Please note that some of the planning guidance referenced in this response is being reviewed and updated to reflect the [National Planning Framework 4](#) (NPF4) policies. For example the [Flood Risk Standing Advice and Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#). It still provides useful and relevant information, but some parts may be updated further in the future.

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

1. Site layout

- 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information.
- 1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground.
- 1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required.

2. Water environment

- 2.1 The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.

- 2.2 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

3. Flood risk

- 3.1 Advice on flood risk is available at [Flood Risk Standing Advice](#) and reference should also be made to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

4. Peat and peatland

- 4.1 Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA's requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage). Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not.
- 4.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.
- 4.3 The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following:
- a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the [Peatland Survey – Guidance on Developments on Peatland \(2017\)](#);

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

4.4 The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep.

4.5 The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.

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

- a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes;
- b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed);
- c) Details of proposals for temporary storage and handling of peat - [Good Practice during Wind Farm Construction](#) outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss;

- d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use. If peat is to be used in borrow pits on site, SEPA will require sections and plans including the phasing, profiles, depths and types of material to be used;
- e) Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides planning advice on. Please refer to [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) 2023, and the [Peatland ACTION – Technical Compendium](#) which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that SEPA can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

5. GWDTE and existing groundwater abstractions

- 5.1 Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas.
- 5.2 A National Vegetation Classification (NVC) survey should be submitted which includes the following information:

- a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

5.3 Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.

6. Pollution prevention and environmental management

6.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the [Guidance for Pollution Prevention](#) (GPPs) and our [water run-off from construction sites webpage](#) for more information.

7. Life extension, repowering and decommissioning

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

7.2 The discarding of materials as waste should be avoided. However, if there is an intention to discard materials then further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

Classified as Internal

Good afternoon,

SGN do not have any High Pressure assets within the vicinity of the above scoping opinion and as such would have no comment/objection.

Kind regards

Bryan Young
Pipeline Officer

Bryan.young@sgn.co.uk

Axis House Edinburgh

sgn.co.uk

Find us on [Facebook](#) and follow us on Twitter: [@SGNgas](#)



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

Your ref:
ECU00005085

Our ref:
GB01T19K05

Date:
06/12/2024

Econsents_Admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED BOWSHIEL SOLAR FARM & BATTERY ENERGY STORAGE SYSTEM (BESS)

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

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

Proposed Development

The proposed development comprises a ground-mounted solar photovoltaic (PV) development with a generating capacity of up to 170MW and a Battery Energy Storage System (BESS) with a generating capacity of up to 150MW, located approximately 2.4km south of Cockburnspath.

The nearest trunk road to the site is the A1(T) which forms the eastern boundary of the site. We note that access is proposed directly from the trunk road, via the existing junction for Bowshiel Farm.

Site Access

Transport Scotland notes that the existing Bowshiel Farm junction is located on a dual carriageway section of the A1(T) with a break in the central reserve which results in a layout where all turning manoeuvres are possible.

We would suspect that existing turning manoeuvres at the junction are low in terms of numbers with just occasional HGV movements.

We therefore have concerns with regard to any intensification of traffic movements at the junction and the ability of the junction to accommodate HGV turning movements safely. In addition, it is noted that the minor arm of this junction has restricted running width, with passing places provided. Transport Scotland will require to be satisfied that sufficient space exists at the approach to the junction to allow two HGVs to pass so as to prevent any incoming vehicles backing up onto the trunk road.

Before submission of any application, we would recommend that consultation is undertaken with TS in relation to the access junction to look at its current geometry and the proposed layout to serve the development. To assist the discussions, it would be good to provide a 1:500 scale drawing of the existing junction to show lane widths, radii and visibility splays along with swept paths of HGVs turning at the junction. If any modifications are to be undertaken at the junction then a plan showing the proposed mitigation should also be provided. The consultation discussions should include the A1 Route Manager who is Alex Joannides (alex.joannides@transport.gov.scot).

Assessment of Environmental Impacts

Chapter 10 of the SR presents the proposed methodology for the assessment of Traffic and Transport. This states that the assessment will be carried out in accordance with the Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

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

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

The SR states that base traffic data has been obtained from the Department for Transport (DfT). This is considered acceptable, but we would ask that “estimated” data from the DfT site not be used. We would add that an alternative source of traffic data is Traffic Scotland’s National Traffic Data System. We note that the study area will include the A1(T), which is considered appropriate.

It is noted that any impacts associated with 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.

Abnormal Loads Assessment

The SR states that no abnormal load vehicles are anticipated during delivery. It is, therefore, accepted that no abnormal loads assessment is required.

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

Yours faithfully

George Smith

George Smith

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

From: [Shearer, Scott](#)
Subject: RE: [OFFICIAL] FW: Request for Scoping Opinion for Bowshiel Solar Farm & Battery Energy Storage System (BESS)
Date: 03 April 2025 15:53:52

Hi James,

As the Scottish Ministers have issued a Scoping Response in advance of our comments, our resources have been dispatched to various other areas of casework for the ECU.

I can feedback the following comments below. A response from our Heritage and Design Officer is due today and I'll forward on receipt;

Policy and Legislative Context

Q4.1 In addition to the listed Development Plan Policies we would also expect the proposal to be assessed against the following Policies;

National Planning Framework 4

Policy 14 Design Quality and Place

Policy 23 Health and Safety (in respect of noise)

Scottish Borders Council Local Development Plan 2024

Policy PMD2: Quality Standards

Policy HD3: Protection of Residential Amenity

In addition to the listed guidance, we would expect the proposal to be assessed against the following;

- The UK Battery Strategy 2023

Landscape and Visual

In the absence of comment from our Landscape Architect at this point

Q5.2 Given the vast scale of the development a 2km study area, a 3km Study area as identified on Figure 6.1 is more appropriate.

Q5.5 It may be suitable to include a VP from the Edinburgh Road to the north even if to confirm no visibility from this route which leads to the village of Cockburnspath

Q5.6 No.

Q5.7 We do not agree that a RVAA is not required. While the Scoping Report forecasts that residential amenity will not be affected, given the number of properties that are located in close proximity to the proposal it is consider that a RVAA is necessary to fully determine the impact this very large solar array would have on residential amenity.

Ecology

Our Ecology Officer has provided the following observations in response to the questions posed in Chapter 7 of the Scoping Report;

Q7.1: I largely agree with the proposed scope of the EIA. Invertebrate surveys should be carried out.

Q7.2: Yes

Q7.3: We hold high-level records for small blue butterflies (Cupido minimus) in the area - Butterfly Conservation Scotland should be consulted for more information

Q7.4: Penmanshiel Windfarm should be considered for cumulative effects of displacement on birds.

Q7.5: Yes

In addition it is advised that;

There are several records of Brown hare within the site. This species requires conservation action in accordance with UKBAP and the Scottish Biodiversity List. To protect watercourses and existing woodland, appropriate buffer strips should be accommodated in the site layout.

As per NPF4 Policy 6, hedgerows ought to be retained, veteran trees and other trees of high biodiversity value need to be retained with a buffer around them so any new planting does not interfere with established root structures and light.

An outline scheme of biodiversity enhancements, including the proposed management and timeframe for implementation, should be submitted with the EIA report to meet the requirements of NPF4 policy 3.

Roads Planning

Our Roads Planning Officers advises that;

The proposed site looks to take access directly from the A1 and utilise a private road leading to Bowshiel. It appears that no public roads maintained by SBC will be used as part of the route.

As the private road forms part of a public right of way, its impact on public access should be assessed.. Similarly, Transport Scotland should be consulted on the use of the access from the A1 Trunk Road.

As such, I am content that any potential issues can be addressed in a Transport Assessment and that the proposed methodology and scope are acceptable.

Contaminated Land

Our Contaminated Land Officer advises that;

The EIA report for the above notes the former uses of the site including a refuse tip, agricultural uses and a sheepwash. It highlights a desk study/preliminary risk assessment has already been undertaken by Argyll Environmental. Table 8.7 notes risks to the water environment will be scoped out of the assessment, however the rationale for this contradicts the subsequent

discussion in Table 9.1 which acknowledges the former potentially contaminative uses of the site. This would likely be addressed by the standard CL condition, and which would require appropriate consideration of all statutory receptors, including the water environment.

I trust that this is of assistance and can be passed to the applicants for their pursual. NB If the applicants wish to discuss the merits of the proposal with us (which we would strongly encourage) before submission, then our paid pre-app service is available. Further details are provided here;

<https://www.scotborders.gov.uk/planning-applications/needs-planning-permission/2>

Kind regards,

Scott

Scott Shearer MRTPI

Principal Planning Officer (Local Review and Major Development)

Planning Housing and Related Services

Scottish Borders Council

tel: 01835 826732

e-mail: sshearer@scotborders.gov.uk

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**CONSULTATION RESPONSE TO
PLANNING OR RELATED APPLICATION**

Comments provided by	Officer Name and Post: Keith Elliott Archaeology Officer	Contact e-mail/number: Keith.Elliott@scotborders.gov.uk 01835 824 000 ext 8886
Date of reply	03.04.2025	Consultee reference:
Planning Application Reference	24/01371/SCO	Case Officer: Scott Shearer
Applicant	Environmental Resource Management	
Agent	Energy Consents Unit	
Proposed Development	Solar Farm with generating capacity of up to 170MW and accompanying Battery Energy Storage System (BESS) with generating capacity of up to 150MW, associated infrastructure, access and landscaping	
Site Location	Bowshiel Solar Farm and Battery Energy Storage System (BESS) Land at Bowshiel Farm Grantshouse Scottish Borders	
<i>The following observations represent the comments of the consultee on the submitted application as they relate to the area of expertise of that consultee. A decision on the application can only be made after consideration of all relevant information, consultations and material considerations.</i>		
Background and Site description	<p>This application anticipates a future Section 36 application for the construction of a solar farm around Bowshiel which located on the sloping ground from the height of Ewieside Hill to the gorge containing the A1 main road and the East Coast Railway Line from Cockburnspath towards Grantshouse, within the northeastern parts of the Scottish Borders. The site is located about 2.5 kilometres south of Cockburnspath.</p> <p>This solar farm is proposed to also include a Battery Energy Storage System (BESS), together with associated infrastructure, access and landscaping for the scheme. It is proposed that the proposed development would have an operational life of 40 years, with construction taking 18 months. The BESS and substation components proposed are located on the western side of the proposed solar far between Bowshiel and Ewieside Hill. The current land use of the area as predominantly agricultural arable and pasture fields of largely regular shapes upon the more gentle slopes to the east and south, above wooded areas of natural or semi-natural woodland on the steeper slopes to north, east, south and southwest.</p> <p>This application has been triggered as the application contains a number of features recorded within the Scottish Borders Historic Environment Record (HER) entries, some indicated by place-name evidence but recorded as crop- and parch-mark archaeology, the site also lies in the sloping ground to the southeast and south of the Scheduled Monument Ewieside Hill hillfort.</p> <p>The submission includes an Environmental Impact Assessment Report that has been prepared by ERM for their client Volitalia UK Ltd.</p>	
Key Issues (Bullet points)	<ul style="list-style-type: none">• Location of the proposed application• Nature of the proposed application• Archaeological sites within the application area and potential for direct and indirect impacts	

	<ul style="list-style-type: none"> • Archaeological sites outside of the application area with the potential for indirect impacts • Significance of any such archaeological remains
Assessment	<p>Background</p> <p>The proposed development would involve construction of the solar farm, not just for the installation of the many proposed panels, but also in the creation of access tracks, substation, BESS and associated hard-standing areas, as well as the creation of new habitat areas.</p> <p>There is the potential for both direct impacts and indirect impacts to archaeological and historic finds, features and/or deposits. The construction phase has the potential for the most direct impacts during the groundworks for the construction of the scheme, though there would also be continuing indirect impacts during the operational life of the scheme, before impacts associated with the decommissioning of the solar farm.</p> <p>The Environmental Impact Assessment (EIA) Scoping Report has covered a number of issues, which include Cultural Heritage of the various archaeological remains present following introductory chapters. A number of archaeological sites have been identified as heritage assets within the site of the proposed panels, though some are somewhat obliquely referred to for example (in 6.2.2 'One modern asset relating to aviation activity (353679)' is an aircraft crash site).</p> <p>There have been no updates to the entries of the Scottish Borders Historic Environment Record (HER) in this area since the HER search was carried out earlier; it is confirmed that there just the one Scheduled Monument in close proximity to the proposed development area (that of Ewieside Hill hillfort SM369).</p> <p>Possible impacts and disturbance of the scheme</p> <p>The potential for direct and indirect impacts to the various archaeological and historic sites within the proposed development area is recognised, as too for the wider surroundings of the proposed development area. There appears little recognition for the avoidance of the cluster of sites of some note, though as yet unscheduled, to the southeast of Bowshiel itself in the High Chesters area. The impacts that are recorded in the EIA Scoping Report should also include the contribution of the introduction of metal components in the scheme – whether in construction or operation – as this would have the potential to contaminate and skew any metal detecting across the area for archaeological and historic metal finds, for which there are the possibilities in the types of site represented.</p> <p>The significance of the likes of the cluster of sites to the southeast of Bowshiel is not recognised by any apparent breaking for the various serried panels in this area as shown in the site layout plan. This would need to be justified as damage is likely to occur to such monuments if the proposal were to take place in the as-is of the submitted plan. There is the presumption in favour of archaeological preservation in situ of monuments and whilst recognising the previous and current agricultural nature of the ground, there is the chance of survival as indicated by the presence of cropmarks for some of these sites. Further the full extent of the sites may be further than currently indicated, even for the 'known' sites with some only ascribed to the area more generally. The EIA Scoping Report anticipates that a mitigation strategy would be agreed upon, though the 'evaluation' of known sites to more fully establish their significance in between the 'levels of fieldwork' as the mentioned excavation</p>

	<p>and watching brief would be a useful addition to add to the listing.</p> <p>Comments on the methodology</p> <p>With regard to the Zone of Theoretical Visibility prepared this includes a number of archaeological sites, with Ewieside Hill hillfort within an area where there much of the proposed scheme visible. On the eastern side of the main A1 Road and East Coast Railway Line gorge to the east the Andrew's Cairn will see most of the proposed scheme as this is noted as seeing the greatest extent of the panels and scheme visible. The whole scheme will be highly visible from the Ecclaw Hill to Blackburn Rig area on the equivalent slopes to the north opposite on the southern side of Edmond's Dean and further to the southeast for the gentler northern slopes issuing from the northern side of Bunkle Edge northwards.</p> <p>The assessment methodology appears to be in order, though it would be preferred if the cultural heritage chapter referred to for the Environmental Impact Assessment Report were to be carried out as a standalone fully comprehensive Desk Based Assessment or Heritage Impact Assessment presented with the chapter an abstract of that report. The relevant legislation should also consider the Protection of Military Remains Act given the Second World War aircraft crash site that is known to have occurred somewhere in the proposed development area.</p> <p>The policy and guidance should also recognise, now, the replacement <i>Our Place In Time by Our Past, Our Future</i> (of last year) commonly referred to as OPOF. Other Chartered Institute for Archaeologists Standard and Guidance should also be borne in mind, though these may be for other techniques of fieldwork method such as for evaluations or geophysical surveys (and their separate reporting, such as through the Online Access to Site InvestigationS) too.</p> <p>However, generally the proposed methodology within the EIA Scoping Report seems appropriate.</p>			
Recommendation	<input type="checkbox"/> Object	<input type="checkbox"/> Do not object	<input type="checkbox"/> Do not object, subject to conditions	<input checked="" type="checkbox"/> Further information required
Response to Questions for Consultees	<p>There questions to consultees are answered below.</p> <p>Q4.1 Is there any additional legislation, policy or supplementary guidance which should be considered in the EIA process?</p> <p>As noted earlier the proposed development area includes the area of a Second World War aircraft crash site; whatever remains of this aircraft should be considered subject to the Protection of Military Remains Act for legislation. This outlines the requirements for any archaeological or other investigation of this site, such as for any licencing of excavations that might be required. There is the potential that there may be human skeletal remains associated with this site.</p> <p>There is a range of guidance for such sites, which deal with both the likes of aircraft crash site investigation as well as for any human skeletal remains.</p> <p>Q6.1 Do Consultees agree with the proposed methodology and scope of assessment?</p> <p>Generally yes, though the iterative nature of developing the proposal – such as for fieldwork between the levels of the archaeological excavation and watching brief in evaluating the survival and therefore significance of the various sites to the Bowshiel should be considered. Looking overall at the Scottish Borders HER the aircraft, ring ditch, pit setting and full details of settlement and enclosure within the</p>			

proposed development area would appear to be either rare site types or with little details for their survival beyond noting their presence, with the justification required for their disturbance or impact.

Q6.2 Do Consultees have any information regarding current or recent archaeological work or projects being undertaken within or in the vicinity of the Proposed Development, particularly those whose results may not yet be recorded in the local HER or HES datasets?

There has been some recent work carried out in the geophysical surveying for a nearby proposal, though those more agricultural arable fields. However, whilst few archaeological features were identified in this work, there were few records of archaeological sites or finds to be expected in this area too. The comparison to this site is somewhat limited. Other excavations recorded in the likes of the wider surroundings are a mixture – such as small village-based work within Cockburnspath (and hence of limited applicability). There have been various pieces of wind farm work outside of the proposed study area (though relatively close by) that have encountered a range of archaeological features, such as Quixwood, upon ground investigations taking place.

Q6.3 Are Consultees aware of any further sites with statutory protection within the wider landscape whose settings may be affected by the Proposed Development?

One suspects not for purely archaeological settings with the Zone of Theoretical Visibility that has been submitted, though this could be usefully extended perhaps to assess the Warlawbank fort (SM5428) which would be located off the southeastern corner of that illustration.

It is worth noting, again, that within the proposed development area the aircraft crash site would fall under the statutory protections of the Protection of Military Remains Act.

Q6.4 Do Consultees have details of any cultural heritage sites in the vicinity of the Proposed Development which it considers may raise significant issues within the EIA process for this development?

Yes – primarily Ewieside Hillfort (SM369) which is located to the northwest of the proposed development as a whole. The views both to and from this site will be regarded as critical for the assessment of this application.

The aircraft crash site will be regarded as a site of national significance with the likes of the national legislation dealing with such sites, though further information on the extent of any surviving wreckage will need to be established – even if the actual crash site might be considered arbitrary for where the actual impact of the crash took place.

Q6.5 Are Consultees aware of any additional stakeholders who will require consultation or where consultation would be desirable?

Yes – it would be useful to have a joint meeting with the Defence Infrastructure Organisation archaeologists, such as Alex Southeran who deal with the Ministry of Defence interests for aircraft crash sites and other issues for the Scotland area. From what is known of this site, then it may also be useful to consider any suitable liaison with Police Scotland too. Historic Environment Scotland consultation has already been remarked upon within the EIA Scoping Report.

Recommended Informatives	<p><i>Our Past, Our Future</i> can be found online with the Historic Environment Scotland website pages; Our Past, Our Future - Summary Baseline Report 2024 HES History</p> <p>'The other' Chartered Institute for Archaeologists Standard and Guidance can also be found online; ClfA Codes, regulations and Standards, and guidance ClfA</p>
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