

Mr Steven McClernon
Energy Consents Unit (ECU)

Our Ref: PCS-20003723
Your Ref: ECU00004892

SEPA email contact:

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

14 January 2025

Dear Mr McClernon

Electricity Act 1989 - Section 36

ECU00004892

Section 36 Application - Glenvernoch Wind Farm

approximately 2.8 km south of the village of Glentrool, and approximately 7 km north-west of Newton Stewart.

Thank you for your consultation which was received by SEPA on 19 November 2024 in relation to the above application. We understand the reason for consultation is EIA.

Advice for the planning authority

We previously responded to this application under SEPA ref: 10212 on 18 September 2023 and outlined our information requirements at the scoping stage. Thank you for re-consulting us at the full application stage. We have reviewed the information available. In summary, due to a lack of information in relation to potential impact on peat and groundwater dependent terrestrial ecosystems (GWDTEs), we submit a **holding objection** and request that determination is deferred until the information outlined in Sections 1 and 2 below has been provided for our assessment.



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

1. Peat management and potential impact on peat

- 1.1 We do not support the re-use of catotelmic peat on access tracks (especially amorphous catotelmic peat on access tracks, as suggested in Table 5-5 of Vol 3 Appendix 12.2 Stage 1 Soils and Peat Management Plan, SPMP). This type of peat is not suitable for many applications and should not be placed at the surface where it will oxidise and degrade. We require confirmation that the re-use of catotelmic peat on access tracks (or elsewhere on the surface) will not take place.
- 1.2 More information is also needed to justify the plans for peat re-use in depressions and hollows. The applicant must explain what the target habitats are and how this method of reuse will be ecologically beneficial, or maintain the peat in its current condition.
- 1.3 The peat and carbon map indicates little overlap of development with Class 1 or 2 peatland. However, we require confirmation that new tracks will be floated in locations where there is overlap with such peatland, or justification where this is not possible. Table 5-6 of the aforementioned SPMP suggests that more floating of tracks is being considered but we require a firmer commitment and more information in this respect.

2. Groundwater dependent terrestrial ecosystems (GWDTEs)

- 2.1 In Chapter 12 (Hydrology, Geology and Hydrogeology), it is stated that the majority of the GWDTE on site are considered ombrotrophic or surface-water fed. This suggests that there are some GWDTEs on the application site. If there are GWDTEs on site, a bespoke risk assessment should be provided, demonstrating hydrological pathways and flow routes in relation to them and the proposed infrastructure.

3. Other planning matters

- 3.1 For all other planning matters, please see our [triage framework and standing advice](#) which are available on our website: www.sepa.org.uk/environment/land/planning/

Advice for the applicant

4. Regulatory advice

4.1 Details of regulatory requirements and good practice advice, for example in relation to private drainage, 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: SWS@sepa.org.uk

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

Yours sincerely
Peter Minting
Planning Officer
Planning Service

Ecopsy to: steven.mcclernon2@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/](#)