

29 March 2022

Commercial in confidence

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Baseline Water Quality Monitoring – Benbrack Windfarm

Dear Angus

Natural Power Consultants (Natural Power) have been commissioned by Red Rock Power Limited ('the Client') to provide Water Quality Monitoring (WQM) between April 2021 to May 2022 prior to the construction of Benbrack Windfarm (the 'Development'). The WQM relates to the plan outlined in the Water Quality Monitoring Plan (WQMP) that is a supporting document to the Construction Environmental Management Plan (CEMP) relative to the variation planning consent reference (Section 36C of the Electricity Act 1989) which was granted on 5th November 2019 by the Scottish Ministers (Reference ECU00001773).

We also understand that condition 16 of the variation planning consent (migratory fish) requires that no works be undertaken within 50 metres of any part of a watercourse within the site unless a baseline electro-fishing and water quality survey has been carried out at such locations as has been agreed in writing with the Planning Authority in consultation with the Galloway Fisheries Trust and Marine Scotland, to confirm the presence of any migratory fish and the water quality of any watercourses.

In anticipation of any such works being undertaken, the purpose of this letter is to highlight the water quality monitoring points that have already been assessed and agreed with the bodies referenced in condition 16, and to seek approval from Dumfries and Galloway Council of using the monitoring points referenced in the Water Quality Monitoring Plan (WQMP) for the purposes set out in condition 16. This letter also seeks to reassure the Planning Authority that once the 12 month water quality monitoring period is over in May 2022, a baseline monitoring survey will be submitted to the Council to fully address condition 16 and to further inform the works that are ongoing in connection with the CEMP.

In addition to addressing specific requirements of conditions 14 and 16, the purpose of the monitoring is to provide an indication of the background hydrochemistry of the Private Water Supplies (PWS) and the surface water networks situated downstream of the Development prior to the initiation of any works, enabling subsequent phases of monitoring to more accurately identify impacts which may have arisen from the Windfarm construction activities. There are 9 surface water monitoring locations across the development area for the baseline phase, alongside 3 PWS sampling locations. The details relating to the monitoring at the Development have been laid out in the WQMP which has incorporated consultation responses with both SEPA and the Galloway Fisheries Trust. Marine Science Scotland (MSS) provided consultation feedback at a later date (attached as Appendix A), and this feedback will be incorporated in the next revision of the WQMP. Additionally, the extensive duration of the WQM from April 2021 to May 2022 has and will

allow the capture of information relating to the seasonal variations associated with water quality, with sampling visits coinciding with a range of low to high flow conditions.

At the completion of the baseline monitoring plan, a baseline report will be produced relating to the PWS and surface water that will highlight the background hydrochemistry and the seasonal variation, as well as discussion relating to the significance of the findings and how it may relate to other supporting documents. Accompanying the baseline report will be the data relating to each sampling visit and the associated laboratory analysis.

If you require further details, please do not hesitate to get in contact.

Yours sincerely

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A. Consultation Feedback – MSS

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Mr Chris McTier
Dumfries and Galloway Council
English Street
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Our ref: FL/54-7

15th September 2021

Dear Chris,

BENBRACK WIND FARM, CARSPHAIRN, DUMFRIES AND GALLOWAY

Marine Scotland Science (MSS) have reviewed the Water Quality Monitoring Plan (WQMP) and Fisheries Monitoring Plan (FMP) which are outlined in the planning conditions and CEMP for the consented Benbrack wind farm. MSS have the following comments:

WQMP

- at least 12 months pre-construction data, including over a full range of flows, should be collected to obtain a robust data set in order to detect any changes during the construction and post construction period;
- all *in situ* sampling should take place at a minimum of monthly intervals including during the post construction period;
- monitoring during the post-construction period should be for at least 12 months, the duration of this monitoring is dependent on the results obtained during the construction period;
- pH should be included in the suite of parameters measured in a UKAS accredited laboratory;
- the proposed control sites should have similar physical, chemical and biological site characteristics to the proposed monitoring sites;

- regular visual inspections should be carried out with particular emphasis on watercourses during and after periods of prolonged precipitation, during the salmonid migration and spawning period and on watercourses downstream of where construction activities are taking place, where traffic is frequenting and where watercourse crossings are located;
- locating an additional sampling site further downstream on the Meadowhead Burn would ensure that any impacts associated with all of the access track, including watercourse crossings, and both borrow pits would be monitored;
- locating the proposed sampling location WQ4 further downstream on Goat Burn would ensure that potential impacts associated with the access track would be monitored; and
- water samples collected at the proposed sampling location WQ3 should also be measured in a UKAS accredited laboratory.

FMP:

- the proposed control site on the Black Water is likely to be impacted from construction activities associated with the consented Troston Loch wind farm;
- a sampling site on the Polnaskie Burn would monitor potential impacts associated with the construction of the metrological mast; and
- locating the sampling site further downstream of the proposed sampling location on Meadowhead Burn would ensure that potential impacts associated with the access track, watercourse crossings and borrow pits would be monitored.

MSS advise that our comments are considered in both documents.

Kind regards,

Dr Emily E. Bridcut