Preface

The Applicant, Brockwell Energy Limited, submitted an application to the Scottish Ministers via the Scottish Government Energy Consents Unit (ECU) under Section 36 of the Electricity Act 1989 and deemed planning permission under the terms of the Town and Country Planning (Scotland) Act 1997, in May 2025.

However, subsequent to the submission of the May 2025 Application, a review of options to reduce impact on forestry, in combination with further discussions with neighbouring landowners ,was undertaken, with the result that turbines T2 and T13 were relocated, although these turbines and their access tracks remained within the Application Site boundary. The relocation of T2 necessitated the rerouting of the access track leading to T1. The main driver for the decision to relocate T2 and T13 was to reduce forestry felling requirements, and has had the benefit of moving T2 off of an area of peat and onto underlying soils which have been confirmed through hand trials to not be peat, and of further enabling landowners and close neighbours to participate in the design and mitigation of the Proposed Development. The changes to the Proposed Development are described in more detail in **Revised Chapter 2: Project Description** and **Revised Chapter 3: Design Evolution and Alternatives**.

The revised layout presented in this Revised EIA Report is referred to throughout this document as the “Proposed Development”. This document is being submitted to the Scottish Ministers as Additional Information, since it comprises a revision of the Breezy Hill Energy Project Environmental Impact Assessment Report to take account of the changes to the Proposed Development.

The purpose of this Preface is two-fold:

- To summarise the changes to the Proposed Development and consequent changes to the Environmental Impact Assessment; and
- To signpost where comments received from consultees on the May 2025 Application can be found in this Revised EIA Report.

Summary of Changes to the May 2025 EIA Report

The relocation of two of the 20 turbines and three turbine access tracks necessitated the revision of the EIA Report. Table (i) provides a brief summary of the main changes in each chapter as a result of the revised layout of the Proposed Development.

However, overall, the revised assessment has **not resulted in any changes to the outcomes** (significance of effects) of the EIA.

Table (i): Summary of Changes in the EIA Report

Revised Chapter	Location	Summary of Changes	Outcome
1 Introduction	Paragraph 1.1.3	Brief description of changes to layout and reason for submitting Additional Information.	-
	Table 1.1	Changes to EIA Team since May 2025 Application	-

Revised Chapter	Location	Summary of Changes	Outcome
2 Proposed Development	Table 2.2	T2 and T13 coordinates updated to reflect new locations.	-
	Paragraph 2.3.27	18.8 km of tracks, compared to previous track length of 29.1 km.	No changes to impact significance in technical chapters.
	Paragraph 2.3.54	Volume of aggregate required increased by approximately 7,000m^3.	No requirement to increase borrow pit area(s). Subject to detailed ground investigation and laboratory testing, the three proposed borrow pits can source sufficient aggregate for the revised Proposed Development.
	Paragraph 2.8.3	Carbon Calculator predicts savings of over 49 million tonnes of carbon dioxide emissions.	No change. Still expect 49 million tonnes of carbon emissions savings when compared to fossil fuels.
3 Design Evolution and Alternatives	Paragraphs 3.7.31 & 3.7.32	Description of changes to the layout of the Proposed Development.	Overall reduction of 4.5 ha of required infrastructure felling, and a reduction of 21.3 ha of management felling. T2 moved off peat onto soil that is not peat. Landowners and close neighbours involved in design evolution process.
4 Approach to EIA	Paragraph 4.3.10	Paragraph updating chapter to include the May 2025 Application.	No change in assessment methodology or approach to EIA.
5 Landscape and Visual Impact Assessment	Section 5.2	Guidance updated to include Scotland's Landscape Charter published in July 2025	Incorporated into assessment.
	Table 5.1 Consultation Responses	Table updated to reflect change in cumulative situation, with new cut-off date of 5 November. Cumulative wind farm developments within 20km of the Proposed Development updated since the previous 'cut-off' date for the May 2025 Application: • 5 more schemes operational; • 2 more schemes under construction; • 5 more schemes in planning	Overall, no changes to EIA outcome (Table 15.5). Also no potential for additional significant cumulative effects. (Paragraph 5.10.17) Despite the proximity of the Proposed Development along with other consented and in planning schemes to the settlement of Rankinston, no additional cumulative effects are predicted from Rankinston or most other visual receptors, however, some additional significant cumulative visual effects occur from core paths, other settlements and roads in proximity to the Proposed Development and the consented Knockkippen and Knockshinnoch

Revised Chapter	Location	Summary of Changes	Outcome
			and the in planning Sclenteuch schemes, noting that the greatest level of effects will result from the introduction of these schemes and not the Proposed Development.
		Residential Visual Amenity Assessment revised and cumulative wirelines updated to reflect change in cumulative situation and relocation of T2 and T13.	No change to RVAA assessment outcome. In terms of effects from residential properties within 2 km of the proposed turbines, some would experience a significant visual effect, but none would experience an overbearing or overwhelming effect (Paragraph 5.10.9).
	Paragraph 5.5.3	North Kyle Wind Farm is now Operational (was Under Construction at the time of the May 2025 Application)	North Kyle Wind Farm forms part of the landscape and visual baseline.
6 Ecology	Table 6-1 Consultation Responses	Table updated to include summary of comments received on May 2025 Application and how / where they have been addressed in the chapter.	N/A
	6.5 Baseline (Table 6.6 and subsequent discussion of monitoring results)	Baseline bat monitoring data gathered in 2025 was incorporated into the baseline.	N/A
	6.6 Scope of Assessment (Protected Species)	Surveys suggest the site may support eight species of bat for commuting and foraging: common, soprano, and Nathusius' pipistrelles, Daubenton's, Natterer's, brown long-eared, Leisler's and noctule. Following guidance , this equates to a Nationally important assemblage. No construction effects on foraging and commuting bats are anticipated as works would mainly take place during daylight hours during the season when bats are active (April to October, inclusive), therefore any disturbance to foraging and commuting bats of any species is unlikely to occur or would likely be	N/A

Revised Chapter	Location	Summary of Changes	Outcome
		negligible in magnitude and is therefore scoped out.	
		Operational and cumulative effects arising from collision mortality for low collision risk bat species are scoped out of the assessment (as per NatureScot et al., 2021). These effects on brown long-eared bat, Daubenton's bat and Natterer's bat are therefore scoped-out of the assessment.	N/A
	Table 6-7: Sensitivity of IEFs	Description of Local updated to include discussion of 2025 bat data results and justification for sensitivity rating.	N/A
	Section 6.7 Assessment Table6-8 Loss of Habitat and discussion of assessment	Updated to take account of revised infrastructure footprint. Increase in *permanent* direct loss of habitats as follows: • Blanket Bog – increase from 0.09 to 0.11 Ha loss; Increase in *temporary* direct loss of habitats as follows: • Wet Modified bog – increase from 0.35 to 0.46 Ha loss.	No change to impact assessment outcome of *Not Significant*.
	Section 6.7 Assessment of operational effects (Bats)	Text updated to take account of 2025 bat monitoring data and revised turbine T2 and T13 locations.	No change to impact assessment outcome of *Not Significant*.
	Section 6.10	Inclusion of commitment to include bat mitigation and monitoring in the OBEMP.	No change to assessment. Commitment carried over into **Revised Chapter 15: Schedule of Environmental Commitments.**
	Technical Appendix 6.3 Ecobat Report Annex F (2025)	2025 Ecobat data	Data taken into account in Chapter 6.
7 Ornithology	Table 7.	Collision risk has been remodelled to take account of relocated turbines.	No change to assessment outcome. All residual impacts on Important Ornithological Features are expected to be *Not Significant*.
	Technical Appendix 7.1	Revised to take account of layout changes.	

Revised Chapter	Location	Summary of Changes	Outcome
8 Geology, Hydrology, Hydrogeology and Peat	Paragraph 8.5.3	Additional investigation of the underlying soils was undertaken at the revised location of T2 and its access track by hand pits, confirming the absence of peat at this location.	N/A
	Paragraph 8.5.9	Revision of Carbon Calculator	The net emissions of carbon dioxide from the proposed amendments of the Proposed Development are expected to be 252,929 tonnes of CO_2e, compared to the findings of the May 2025 EIA Report which predicted 242,525 tonnes of CO_2e. As such, the Proposed Development has a payback time of 2.0 years compared to the 1.9 years indicated in the findings of the EIA.
	Paragraph 8.5.9	Aggregate requirements. The estimated aggregate requirements for the Proposed Development are 202,801m^3 compared with 205,814m^3 for the Proposed Development.	No change to outcome. The three borrow pit search areas identified can supply all the aggregate required for the Proposed Development
	Paragraph 8.6.9	Peat Excavated and re-use Volumes:	1,226m^3 less peat and soils will be disturbed compared to the Proposed Development of the May 2025 Application.
9 Forestry	Table 9.6	Recalculation of forestry felling areas to take account of revised design.	5 Ha reduction in required forestry felling. No change to outcome of EIA – *Not Significant*.
10 Cultural Heritage	Entire chapter	Whole chapter has been rewritten.	No change to outcome of EIA – *Not Significant*.
11 Traffic and Transport	Table11.8 Personal Injury Accidents	Updated to take account of recent data.	No change - no specific road safety issues within the immediate vicinity of the Proposed Development that currently require to be addressed or will be exacerbated by construction activities associated with the Proposed Development.
	Paragraph 11.12.7	Scenario 1 (100% aggregate is imported to site) - 62 less vehicle movements per month during peak construction activity, equating to two less HGV movements per day.	No to outcome of EIA - *Not Significant.*

Revised Chapter	Location	Summary of Changes	Outcome
	Paragraph 11.12.10	Scenario 2 (100% aggregate won from onsite borrow pits) – 36 less vehicle movements per month during peak construction activity, equating to two less HGV movements per day.	
	Table 11.12 Scenario 1 Traffic Flows and Impacts, Paragraphs 11.12.19-11.12.21	Discussion of how the traffic flows would be affected.	
12 Noise	Chapter 12	Revised noise prediction model to reflect relocation of T2 and T13.	No change – Residual Effects *Not Significant* (Paragraph 12.10.1).
		Revised cumulative noise model to take account of updated cumulative situation.	No change - No Significant cumulative effects predicted (Paragraph 12.11.8)
		Reassessment of noise impacts during each phase of the Proposed Development	No change - the relevant noise limits during the construction, operation, and decommissioning of the Proposed Development have been shown to meet the relevant noise limits, and therefore the effects during each phase of the development have been determined to be *Not Significant* (Paragraph 12.13.6)
13 Aviation	Figures 13.1 and 13.2 updated.	No change to assessment required. Chapter included for completeness of Revised EIA Report.	No change to outcome of assessment. Mitigation agreement ongoing between Glasgow Prestwick Airport and the Applicant.
14 Other Issues	Shadow Flicker Model results (Tables 14.1 and 14.2)	Remodelled worst-case and realistic scenario shadow flicker based on the revised Proposed Development layout. Increase in realistic-case hours per year at Drumbowie and Ravenscroft; decrease at Rankinston. Slight increases in minutes per day on worst day. However all modelled results are well below the 30 hours per year or 30 minutes per day significance thresholds.	No change to outcome of assessment. All shadow flicker is treated as *Significant* and will be mitigated through shadow flicker protocol.

Revised Chapter	Location	Summary of Changes	Outcome
15 Summary of Commitments	Introduction	Added a discussion of the embedded mitigation & standard mitigation such as a Construction Environmental Management Plan, Species Protection Plan (SPP), appointment of an Ecological Clerk of Works, etc. so that the commitments in Table 15.1 are those that constitute 'additional' mitigation.	No change to the approach, just provided clarification.
	Table 15.1	Reference numbers added to commitments	Adding reference numbers will make compliance with these commitments auditable and easy to refer to during the various lifecycle stages of the Proposed Development.
	Table 15.2, Commitment 33	Added a commitment to implement a programme of post-construction bat monitoring for a minimum of three years and to undertake fish monitoring. Bat monitoring would comply with a detailed Bat Mitigation and Monitoring Plan (BMMP) or similar, which would also include that if the annual monitoring concludes that the mitigation is not enough then amendments to the curtailment/further mitigation would be proposed.	No difference to the outcome of the assessment. The inclusion of this commitment addresses comments of NatureScot and Fisheries Management Scotland.

Responses to Consultee Comments on May 2025 Application

Table(ii): Signposting Responses to Consultee Comments

Consultee Comments	Where Addressed in the Revised EIA Report
Ecology	
NatureScot 09 July 2025	Revised Chapter 6 Ecology, Table 6-2
	Paragraph 29.1.94
Arran and Ayrshire Bat Group 09 July 2025	Revised Chapter 6 Ecology, Table 6-2
	Paragraph 29.1.71
	Paragraph 29.1.94
Ornithology	
NatureScot 09 July 2025	Revised Chapter 7 Ecology, Table 7.1
Hydrology and Peat	
Ayrshire Rivers Trust 03 June 2025	Revised Chapter 8 Geology, Hydrology, Hydrogeology and Peat, Table 8.1 Summary of Consultation Responses
Scottish Water 09 June 2025	
The Coal Authority 09 July 2025	
Scottish Environment Protection Agency (SEPA) 22 July 2025	
NatureScot 31 July 2025	
Forestry	
Scottish Forestry 09 July 2025	Revised Chapter 9 Forestry. Table 9.2 Consultee Comments on May 2025 Application.
Cultural Heritage	
Historic Environment Scotland (HES) 05 June 2025	Revised Chapter 10 Cultural Heritage, Table 10-1
Historic Environment Scotland (HES) 28th July 2025	